

Canary Wharf Contractors Response to OFGEM Consultation on penalties for the distribution network operators under the Incentive on Connections Engagement dated 21st August 2017

BACKGROUND

We have enjoyed and excellent relationship with UKPN, the incumbent DNO, over the years and this has improved year on year. The nature of our work means that our power demands are significant and focused in the local area. As a major connections customer the demands we place on the local network are significant and therefore investment and preplanning in the local infrastructure is essential. We are pleased with and have experience of the DNO, in conjunction with ourselves, making such investments and improvements that have benefited the resilience and capacity of the local network.

'DNO,s must demonstrate that they have taken into account on-going feedback from a broad and inclusive range of connection stakeholders in developing their strategy, activities and outputs. If not, they must give reasons that are reasonable and well justified,

Do you consider that UKPN delivered actions in response to the issues highlighted above? Do you have any additional evidence to support your view.

Yes we do believe that UKPN have delivered actions to issues highlighted. That is *1. Investing in the ageing last mile network, improving connection times by 20%, standardisation of land rights (such as way leaves and easements).*

These include the increased capacity available in the area by the successful completion of a UKPN Primary Substation. This facility will provide power to the Wood Wharf development and has enabled its design and planning without the need for an onsite facility. Furthermore we aware that UKPN investment in this facility is further making capacity available at existing primary substation further improving the availability of power for other sites and improved resilience of the Network. The collaborative approach we have enjoyed with UKPN has allowed us to benefit from network planning and allowed our developments to continue assured of sufficient power. This collaboration includes quarterly meetings senior management including the connections director. We also have access to the area connections manager on a daily basis if required. Due to the significant DNO infrastructure required for our developments it is essential that we maintain a good working relationship and consistency of personnel on our projects. At our request UKPN have facilitated a consistent team at project level, for all our canary wharf projects, including the same project manager, operations staff and building design officers. This has allowed us to standardise our design and delivery approach for DNO facilities which has been mutually beneficially for both ourselves and the DNO.

Where relevant do you consider that UKPN provided reasonable and justified reasons why the commitment was not included in the work plan ?

Further to a review of the UKPN document *service Development Plan, Looking forward and Back report, dated May 2017* this document includes the work plan. This document clearly sets out in section 2.5 customer feedback has been taken into account. Stakeholders strategic priorities have been identified through stakeholder engagement process set out in the previous section 2.4. We can confirm that we have been involved in the stakeholder engagement process on numerous occasions. These have taken the form of specific seminars of which prior notice and content have been published well in advance covering a huge range of topics. We have been invited to many of these seminars and have attended in previous years which have been extremely beneficially and engaging. UKPN encourage participation at these events and we have seen debated issues transform UKPN documentation on a continuous basis reflecting the stakeholders views. We have further benefited at the surgeries that UKPN hold and allow targeted engagement. But by far the most valued process is the attention we receive from the project teams and director meetings from which we see our views taken into account in a both timely and targeted manner. An excellent example of this is where UKPN standards were recently challenged regarding the detailed infrastructure arrangements of IDNO and DNO cable routing. The considered and timely response from UKPN allowed the project to progress without delay. Section 3 of the UKPN document sets out initiatives which in our opinion have been developed from the stakeholder engagement and form part

of the UKPN work plan. It is therefore considered that the commitment was indeed included within the work plan.

Do you consider that market segments mentioned above were the relevant ones affected. Were other market segments also affected ?

Further to our above responses we have a positive experiences in all our sectors of involvement. Whilst we do not deal with LA works, the market considered affected by OFGEM, we do not consider that UKPN have failed to take account of customer feedback and therefore cannot confirm that any other sectors have been affected.

DNO,s must demonstrate that they have undertaken a comprehensive work plan of activities, failing this, to provide an explanation that is reasonable and well justified.

Whilst we are unable to comment on the specific questions asked we would state as follows. We note that the UKPN document *service Development Plan, Looking forward and Back report, dated May 2017* clearly sets out a significant and comprehensive work plan of activities. We can confirm over the years significant improvements in dealing with UKPN specifically in new connections LV, new connections HV, disconnections LV, disconnections HV. The areas of improvements have generally been throughout the areas of our involvement including quotations, leasing, design standards, technical assistance, operations, health and safety, program and response times. The list of initiatives is significant many of which we have benefited from the improvements made. We can therefore state that in our opinion that UKPN have indeed undertaken a comprehensive work plan of activities.

DNO,s must demonstrate that they have implemented a comprehensive and robust strategy for engaging with connections stakeholders or, failing this, to provide an explanation that is reasonable and well justified.

Whilst we are unable to comment on unmetered LA work we would state as follows. We have for many years at canary wharf carried out forward planning of our developments in conjunction with UKPN. This has been absolutely necessary in order for the available electrical capacity to be in place when required. Often the network has required reinforcement which often requires greater lead-in periods than that of the developments themselves. It is important that the developer can give clear direction to the DNO at the earliest possible time to enable network planning, and subsequently network reinforcement, if required, to take place in due time. We have experienced an excellent engagement process with UKPN that has enabled significant planning advice and options on what, where and how to upgrade the network to facilitate our works. This process has only improved and for the year 2016 – 2017 we have invested in power supplies to Wood Wharf, Newfoundland, and other sites that will enable all known future phases of these developments. It can therefore be said that we have experienced and continue to benefit from, the UKPN comprehensive and robust strategy for engagement with connections stakeholders.

DNO,s must demonstrate that it has delivered its relevant outputs. If not, the DNO is required to provide reasons that are reasonable and justified.

Do you consider that UKPN delivered a single point of contact for connection customers ? Do you have any additional evidence to support your view.

Yes, UKPN have provided a single point of contact for all our works. This person is the UKPN project manager and has been the same individual for our canary wharf projects. As previously stated we have access to UKPN senior management at various levels, a dedicated building design officer and operations field engineer. In all cases we revert to the UKPN project manager as the single point of contact.

Do you consider that the UKPN,s commitment to reduce the time to provide a quote has been delivered.

Yes, We have experienced year on year improvements on the time required to deliver quotations.

What specific actions did you expect UKPN to take to ensure this commitment was delivered.

To demonstrate that the measures taken to meet the initiatives identified within the work plan have been met as set out in section 3.0 of the UKPN document *service Development Plan, Looking forward and Back report, dated May 2017*.

If applicable, do you consider that UKPN provided reasonable justifiable reasons why the commitments was not delivered ?

Not applicable.