

Please find TUSC's response in respect this consultation with regard to UKPN:

Before addressing the questions, we would state that if UKPN has not made clear that it has delivered standardisation of land rights, then it is a failure of its submission rather than the reality. We attended a well attend stakeholder event (details available upon request) in which the standardisation was presented and not only is such a fact, but the nature of the standardisation is very customer friendly. UKPN's land rights policy is now industry leading.

Market segments all of UKPN's licensee areas: Metered DG – LV work; London Power Networks - Unmetered Connections – LA Work.

Do you consider that UKPN delivered any of these commitments? Do you have any additional evidence to support your view?

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

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

We have not worked in the above relevant market segments during the reference period.

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We comment only on: Complete disconnections pilot and transfer to business as usual (BAU)

Do you consider that UKPN delivered any of these commitments? Do you have any additional evidence to support your view? *We do consider that UKPN delivered on the pilot, but would submit that next year (this one) would be the measure of whether it has become BAU. We are midway through an HV demand disconnection, so will have evidence going forward.*

What specific actions did you expect UKPN to complete in order to deliver the commitment(s) that you feel they did not fulfil? Which of these actions do you believe was not complete? *We did not expect that HV disconnections would be improved via the pilot in terms of being BAU this year.*

Do you consider that market segments mentioned above were the relevant ones affected? Were other market segments also affected? *No further comment.*

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Market segment - Unmetered Connections – LA Work

Do you consider that UKPN implemented a comprehensive and robust engagement strategy for engaging with its local authority stakeholders?

What specific actions did you expect UKPN to complete in order to deliver a robust and comprehensive engagement strategy for engaging with local authorities? Which of these actions do you believe was not completed?

If applicable, do you consider that UKPN provided reasonable and justified reasons why it did not deliver a robust and comprehensive engagement strategy for engaging with local authorities?

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

Our only observation is that LAs and LA contractors attending many of the same stakeholder meetings as TUSC.

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Ofgem states: 'Competition is active in the electricity network. If a customer wants to construct a new piece of network, they can commission the local DNO, or they can commission and Independent Connection Provider (ICP). An Independent Distribution Network Operator (IDNO) may then operate the new network'

TUSC would like to put on record that to support the concept of competition, ICPs should either declare their total independence or nature of their commercial association with an IDNO. Anything less means that Ofgem's above statement is misleading.

Do you consider that UKPN delivered its commitment? Do you have any additional evidence to support your view

What specific actions did you expect UKPN to complete in order to complete this commitment? Which of these actions do you believe was not complete

If applicable, do you consider that UKPN provided reasonable and justified reasons why the commitment was not completed.

Do you consider that market segments mentioned above were the relevant ones affected?

Were other market segments also affected?

No further comment.

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Market segments (Ofgem does not state which licence areas) are Metered demand – LV work, Metered demand – HV work, Metered demand – EHV work, Metered demand – EHV+ work and DG LV.

Our comments relate to metered demand LV work and metered demand HV work, S16 and via SLC15.

Do you consider that UKPN delivered a single point of contact for connection customers? Do you have any additional evidence to support your view? *The single point of contact is usually the designer. We would simply state that clarification of this both for 'S16 and SLC15' connections would be good. We have evidence which is commercially sensitive, but will be available in 2018.*

Do you consider that UKPN's commitment to reduce the time to provide a quote has been delivered? *Yes the commitment is there.*

What specific actions did you expect UKPN to take to ensure this commitment was delivered? *Regular stakeholder meetings, which it is doing.*

If applicable, do you consider that UKPN provided reasonable and justified reasons why the commitment was not delivered. *No comment.*

Do you consider that market segments mentioned above were the relevant ones affected?

Were other market segments also affected? *No comment.*