

**Andrew Wright**  
**Senior Partner, Energy Systems**  
**The Office of Gas and Electricity Markets**  
**9 Millbank**  
**London**  
**SW1P 3GE**

18 Sep 2017

Dear Andrew,

## **RE – Incentive on Connections Engagement Consultation**

Triconnex Ltd. is a multi-utility connections provider active in Electricity, Gas, Water and communications infrastructure connections across England, in particular in the South West and South East. We specialise in residential housebuilding connections, from LV to EHV, and also carry out commercial connections (both HV and LV). We are predominantly active in the following ***‘Metered Demand Connections’*** Relevant Market Segments:

- Low Voltage (LV) work
- High Voltage (HV) work
- HV and Extra High Voltage (EHV) work
- EHV work and above

This is our submission of comments on specific areas of the DNOs’ ICE reports and engagement activities, as requested in your letter entitled ***‘Consultation on penalties for the distribution network operators under the Incentive on Connections Engagement’***, dated 21 August 2017.

We work predominantly with UK Power Networks, Scottish and Southern Power Networks and Western Power Networks, so have a good view across the processes and procedures employed by these DNOs’, as well as the scope and quality of their respective ICE plans, activities and commitments. With this industry view, we were very surprised by the level of penalty proposed to be applied to UKPN (maximum penalty) in comparison to SSE and WPD. While issues remain, we consider the UKPN are leading the way in terms of engagement, the robustness of its ICE plan and the support offered to ICPs by a DNOs. This document sets out our responses to the specific questions on UKPN.



## Response to Annex 5 – UK Power Networks

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

UKPN have made substantial progress over the last year with regards to their documents, and in many cases have made legal agreements easier to obtain with clearer guidance about when to use Termed Wayleaves and Deed of Easements.

They held a workshop on the 15<sup>th</sup> March, where ICP's and IDNO's were invited along to comment on their processes, and suggest improvements. These were listened to and adopted, with the results being the attached policy. The main change is that we are now able to instruct directly to the Consents team, rather than via the Designer, which saves 2 weeks off their internal process. Attached is the presentation and notes from that workshop.

They have also reviewed their deeds / Heads of Terms to include amendments that were usually requested and accepted by UKPN, and re-wrote many clauses into 'plain English' which makes them much easier to follow. As an example, attached are the old Heads of Terms (Heads of Terms – Deed of Grant UKPN) and the new version (CON+08+111d ....). It's clear that the documents have been updated and the feedback we've had from clients is that they are clearer about what they are required to sign up to (which was always a query).

UKPN's CIC consents team is by far the most helpful out of all the DNO's. Their communication is excellent, and they always look to work with you to complete legals, and offer solutions to issues, rather than just saying 'no'. They are always approachable and I know the whole team here values their input and expertise.

Attached in a folder called 'Annex 1' is supporting information mentioned above.

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

We do not agree with the stakeholder feedback where one point of contact is not provided. For schemes where diversions are required to enable connections work, we have one point of contact (the project designer). Where multiple voltages are involved with diversions and connection work, again we have one point of contact, despite multiple teams within UKPN being involved.

[REDACTED]

### 16 Do you consider that UKPN's commitment to reduce the time to provide a quote has been delivered?

We do not hold our quote application data sufficiently dis-aggregated into quotes types to highlight this. However, we have no current complaints around timescales to provide quotes, and have been pleased with UKPN's approach to quotes when we need them



urgently. Because UKPN share with us their internal structures and escalation lists for connections activity, it enables our own staff to directly liaise with the correct person quickly. An example of when this works well is when (for whatever reason) we need a quote much faster than usual. Attached is an example (in folder marked 'Annex 3') where we needed on urgent (and complex) number of LV POCs, and received them back the same day. This flexibility and accessibility is more important to us than an average reduction in timescales.

In addition, we have received excellent support from UKPN in gaining the ability to determine our own point of connection. This has included IT support, training and one to one support. An example of this was the entire Competition in Connection design management team coming to our offices for the day to train our staff, and provide support. We have not had this level of support from any other DNO. This will make a material impact on our response times to customers as rather than the DNO determine the POC, we will be able to.

**17 What specific actions did you expect UKPN to take to ensure this commitment was delivered?**

We consider these commitments met – increased flexibility in quote times (as per the example), and an allocated single point of contact for Diversion and Connections work.

**18 If applicable, do you consider that UKPN provided reasonable and justified reasons why the commitment was not delivered**

We consider the commitments full met.

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

We consider the commitments full met.

In summary, while structural issues remain to enable full competition (such as ICPs being unable to use 'Statutory undertaker' right to undertake roadworks), we feel that in comparison to the other DNOs, UKPN has the most comprehensive and complete ICE plan, and they have followed through on it. We feel that engagement with ICPs should go further than 'ticking' elements of the ICE plan, but engagement in good faith to support ICPs. In this regard UKPN lead – we have numerous issues particularly with SSE where despite managers promises, their local operational teams fail to comply with even their own procedures. This does not happen with UKPN.

Yours Sincerely,

Signed by Simon Gallagher 18/9/18

**Simon Gallagher** BEng CEng MIET  
Technical Director  
Triconnex Ltd.

