

Response template – Incentive on Connections Engagement

Question	Response
About you and your work	
1. What is the name of your company?	Openreach Ltd, a legally and functionally separate line of business within British Telecommunications Plc ("BT").
2. Which DNO's ICE submission is your response related to? Please indicate clearly in your response to the questions below whether your comments refer to the DNO's plans as a whole, or to one of the DNO's licence areas. If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.	Electricity North West (ENW) BT has almost 10,000 connection points across the ENW licence area
3. What type of connection do you generally require? And for each type of connection, how many connection applications, including total MVA (Mega Volt Ampere) of connections have you made in the past year?	Openreach generally require new unmetered connections for new Fibre to the Cabinet (FTTC) installations. BT also require metered connections for new mobile base stations as well as capacity upgrades to telephone exchanges. Openreach infrastructure in the street requires repair and restoration of power following road traffic incidents (RTIs).
Consultation questions	
Section 1: Looking Back report 2017/18	
We want your views on how well the DNOs have performed over the last regulatory year	

Your engagement with the DNO								
1. How many DNO stakeholder engagement events have you been invited to this year? (This can include engagement outside official events)	none	1	2	3	4	5	6	>6
	X							
2. How many DNO Stakeholder events have you been to? This can also include meetings outside of official engagement events	none	1	2	3	4	5	6	>6
	X							
3. Tell us about how the DNO engaged with you a) What did the DNO do? b) How did the DNO do it c) Did the DNO have a robust engagement strategy?	<p>Response to parts (a) to (c).</p> <p>Despite the very large number of connection points to ENW networks and the critical national infrastructure operated by Openreach on behalf of all Communications Providers (CP), there has been no proactive engagement from the DNO with either BT or Openreach.</p> <p>Engagement to seek swift resolution of customer affecting issues (knockdown of FTTC) at ENW manager level resulted in the reported knockdowns being resolved quickly.</p> <p>Openreach note the use of AccountAbility to provide independent assurance (pg9 of ICE Unmetered Other segment report) and their comment that <i>'Stakeholders are formally invited to comment and feedback in the planning, development and design of the stakeholder engagement sessions. Their input is further solicited and validated in the development of ensuing company ICE action plans. ENWL has demonstrated well-structured and formal internal systems and processes to plan, prepare, implement and monitor its Connections engagements.'</i></p> <p>As noted above Openreach and BT cannot evidence any engagement from ENW during the preparation of their 17/18 or 18/19 workplans</p>							

The DNO's work plan	
4. Objectives: Have you seen the DNOs work plans? a) Does it take into consideration your needs? If so, how? b) If it doesn't please explain why	Response to parts (a) and (b). The 17/18 plan provided opportunities for engagement, but there has been no engagement with ENW. As a result the work plans do not take into consideration the needs of Openreach.
5. Actions: Do you think the DNO has delivered its work plan? a) How has the DNO done this? b) If you do not think the DNO has delivered its work plan, please explain why	Response to parts (a) and (b). Openreach note that ENW refers to success against its 'Time to Connect' target (pg 14 of ICE for Unmetered Other segment) ' <i>To continually drive our performance in delivering customer projects, we committed to achieving an average Time To Connect target of 22 days against the guaranteed standard of 35 days. We are proud to say that we have achieved an average Time To Connect of 21 days during 2017- 2018.</i> ' These New Connection times have been exceeded by ENW in providing power restoration to FTTC cabs following knockdowns, with the majority being within 5 days. This demonstrates a customer centric focus by ENW. Each ENW connection point supplying our infrastructure can support up to c.300 Openreach/CP customers. Therefore Openreach would welcome the opportunity to work with ENW to simplify process further to deliver power restoration more quickly for Openreach and by extension our CP customers.
6. Outputs: Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why	No comments on the basis that DNO outputs bear no real relevance to the issues that Openreach face.
Your feedback on performance	
7. Do you think the DNO's strategy, activities and outputs have taken into account ongoing feedback from broad and inclusive range of connections stakeholders?	There is limited evidence of electricity consumers being engaged in the ICE process. Openreach consider that this is a material gap in stakeholder consultation and is likely to be contributing to service issues faced by Openreach.

8. How satisfied are you with the DNO's overall performance?	very unsatisfied	not satisfied	satisfied	very satisfied
		X		
9. General feedback	The Openreach assessment of 'not satisfied' reflects no engagement from ENW with Openreach or BT. This results in a current position of no confidence that ENW understand Openreach requirements, as a customer with a very large number of connection points supporting critical national infrastructure.			

Section 2: Looking Forward plans 2018/19

We want your views on what the DNO aims to achieve in the coming year

10. Are you satisfied that the DNO has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	No. No engagement has taken place with Openreach or BT in setting the ICE work plan for 18/19 despite the scale and critical nature of our infrastructure. We would welcome the opportunity for regular engagement with ENW.
11. Do you agree that the DNO has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection	The lack of consultation has resulted in the 18/19 work plan not seeking to address the issues faced by Openreach.

stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?	ENW workplan should include the development of guidance and process for telecommunications infrastructure including high priority no supply faults and high priority power restoration following knockdown.
12. Do you consider that the DNO has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?	Openreach specific requests for customer service improvement in managing connections for telecommunications infrastructure are missing from the plan.
13. Would you agree that the DNO proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?	See response to point 7, which is also a relevant answer to this question.

Annex 1 - Consultation on the Incentive of Connections Engagement (ICE)

- 1.1. We would like to hear the views of interested parties in relation to any of the issues set out in our open consultation letter.
- 1.2. The questions we have asked are directly linked to the minimum criteria set out in the ICE guidance document. You can find this on our website.
- 1.3. If you have any questions on this document please contact:

ICE Team
Ofgem, 10 South Colonnade, Canary Wharf, E14 4PU
0207 901 7000
Connections@Ofgem.gov.uk

- 1.4. **Responses should be sent by e-mail by 20 July 2018 to the address above.**
- 1.5. Unless marked confidential, all responses will be published by placing them in Ofgem's library and on its website www.ofgem.gov.uk. Respondents may request that their response is kept confidential. Ofgem shall respect this request, subject to any obligations to disclose information, for example, under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004.
- 1.6. Respondents who wish to have their responses kept confidential should clearly mark the document/s to that effect and include clear reasons for confidentiality. Respondents are asked to put any confidential material in the appendices to their responses.
- 1.7. Next steps: We will consider the responses to this consultation and these will be used alongside other evidence for our assessment of the ICE plans.
- 1.8. Each of the questions asked by this consultation is set out in the template above.
- 1.9. Please ensure that you **indicate the DNO or specific licence area** to which your experiences relate. You can refer to annex 2 for a map of the DNO's licence areas. Please note, Northern Ireland is not subject to this consultation.
- 1.10. When considering your responses to these questions, please consider your experiences, the actions that the DNO has undertaken or committed to undertake, and the actions that you consider it could reasonably undertake.
- 1.11. Please make sure you highlight which year a specific event happened in. The regulatory year runs from 1 April to 31 March**

Annex 2 – DNO's Licence Areas Map and List



ELECTRICITY DISTRIBUTION NETWORKS

- Scottish & Southern Electricity Networks
 - SP Energy Networks
 - Electricity North West
 - Northern Powergrid
 - UK Power Networks
 - Western Power Distribution
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	Distribution network owner	Distribution network operator
1.	Electricity North West Limited	Electricity North West Limited
2.	Northern Powergrid	Northern Powergrid (Northeast) Limited
		Northern Powergrid (Yorkshire) plc
3.	Western Power Distribution	Western Power Distribution (West Midlands) plc
		Western Power Distribution (East Midlands) plc
		Western Power Distribution (South Wales) plc
		Western Power Distribution (South West)
4.	UK Power Networks	London Power Networks plc
		South Eastern Power Networks
		Eastern Power Networks plc
5.	SP Energy Networks	SP Distribution plc
		SP Manweb plc
6.	Scottish & Southern Electricity Networks	Scottish Hydro Electric Power Distribution plc
		Southern Electric Power Distribution plc