

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.	Northern Powergrid (NPG) Our response relates to the DNOs plans as a whole, as BT and Openreach have infrastructure in each licence area BT has over 14,000 connection points across the two NPG licence areas
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 NPG 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 resolution of customer affecting issues (knockdown of FTTC) at NPG Manager level was not progressed with any commitment.</p> <p>NPG simply sought to retain the process for the restoration of power to repaired FTTC within the New Connections process despite Openreach explaining the significant issues with this approach. This process is entirely unsuitable for the restoration of power to telecoms infrastructure and the RTI situation.</p> <p>BT resorted to seeking the support of our licenced electricity supplier to secure contact with a Senior Manager within NPG.</p> <p>Our contact with NPG Director delivered resolution of specific knockdown issues but the ad-hoc resolution by escalation is not suitable for the ongoing requirements of Openreach and by extension our CP customers.</p> <p>Pg14 of the ICE refers to webinars of Connections Engagement Events 'introducing live webcasting from our engagement events and inviting 6,200 connections customers to take part'. Openreach and BT are not aware of any approach for engagement by NPG, despite the very large number of connection points and the escalations raised.</p>							

The DNO's work plan	
<p>4. Objectives: Have you seen the DNOs work plans?</p> <p>a) Does it take into consideration your needs? If so, how?</p> <p>b) If it doesn't please explain why</p>	<p>Response to parts (a) and (b).</p> <p>The 17/18 plan provided opportunities for engagement, but these opportunities were not mentioned to Openreach by NPG during our escalation calls with senior management at NPG. As a result the work plans do not take into consideration the needs of Openreach.</p> <p>For example, NPG has not been responsive to requests to create a business as usual process to resolve our major customer service challenge (knockdown of FTTC)</p> <p>We note that Service Level Agreements have been put in place by UKPN with its Highways Services Customers and are referred to in its ICE submission.</p>
<p>5. Actions: Do you think the DNO has delivered its work plan?</p> <p>a) How has the DNO done this?</p> <p>b) If you do not think the DNO has delivered its work plan, please explain why</p>	<p>Response to parts (a) and (b).</p> <p>No comments on the basis that DNO outputs bear no real relevance to the issue that we have been raising.</p>
<p>6. Outputs: Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why</p>	<p>No comments on the basis that DNO outputs bear no real relevance to the issue that we have been raising.</p>
Your feedback on performance	
<p>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?</p>	<p>Openreach review of the ICE plan note that the stakeholders who NPG quote within the ICE with are predominantly Distributed Generation and the consultants and engineering firms who work for generators and also for demand connections.</p> <p>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 the service issues faced by Openreach.</p>

8. How satisfied are you with the DNO's overall performance?	very unsatisfied	not satisfied	satisfied	very satisfied
	X			
9. General feedback	No further comments			

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?	<p>No. No engagement is in evidence with BT or Openreach despite the scale and critical nature of our infrastructure. No engagement has taken place with Openreach or BT in setting the ICE work plan for 18/19 despite previous escalation of issues.</p> <p>In the Introduction to its Forward Looking Plan (pg12), NPG notes '<i>Beyond ICE, Northern Powergrid continues to operate a wider, comprehensive and robust stakeholder strategy, one which Ofgem has previously recognised as being 'an example of good practice'. We value every piece of feedback that</i></p>
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we receive. We review each comment and, through a process of management review, we seek to resolve the issue that has been raised, whether it be simply answering a customer's query or creating an improvement action that can resolve an emerging issue. Ultimately, with the involvement of our executive, we agree the content and internal ownership of all the commitments that we take forward into our ICE work plan. This process is not a one-time only action each year, but a continuous process that we engage in at every opportunity, with every customer interaction.'

In Openreach experience of seeking to work with NPG we have not seen this approach to customer engagement and drive for resolution. Only by escalation to NPG Director level were specific knockdown issues able to be progressed and no ongoing engagement has been sought by NPG to resolve the underlying process issues faced by Openreach.

Pg 19 notes the posts of 'Head of Connections Services' and 'Stakeholder Engagement Manager'. Openreach would welcome the opportunity to meet with and discuss our issues with these individuals. No mention was made of these roles during our escalation discussions with NPG staff, and no follow up proactive engagement has been evidenced from NPG.

Pg 19 also notes '*In formulating our 2018/19 plan, we collated, considered and, where appropriate, responded to 280 individual stakeholder comments received during the course of the ICE plan year... This year, only 10% of the comments we received generated actions in our Looking Forward work plan. Inevitably, year-on -year the number of actions in our ICE plans is decreasing as we improve our approach, give stakeholders more opportunities to engage and deliver the 'quick wins' identified by our customers.'* Openreach notes that there is no reference within the ICE plan to the issues raised with NPG Senior Management in April 2018, issues which are clearly customer affecting and which have attracted negative media attention (for instance in The Mail Online). This is a material gap, which Openreach would welcome working with NPG to resolve within the 18/19 Forward Looking plan.

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 stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?	<p>The lack of consultation noted above has resulted in the 18/19 work plan not seeking to address the issues and challenges raised by Openreach with NPG senior management.</p> <p>NPG work plan should include the development of guidance and process for telecommunications infrastructure including high priority no supply faults and high priority power restoration following knockdown.</p> <p>Openreach would welcome engagement with NPG to supplement the proposed work plan to close this gap.</p>
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?	<p>See response to point 7, which is also a relevant answer to this question.</p> <p>In addition, pg 47 of the ICE notes that in a market research exercise '<i>302 major connections customers were contacted from market segments covered by the ICE initiative - metered, unmetered and distributed generation connections. Independent Connection Providers were also contacted</i>'. Openreach and BT cannot evidence any contact by NPG to seek our views, despite the extent of our infrastructure within NPG licence areas.</p>

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