

## Response template – Incentive on Connections Engagement

Question	Response
<b>About you and your work</b>	
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?  <b>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.</b>  If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.	Scottish Power Energy Networks (SPEN)  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 SPEN 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).
<b>Consultation questions</b>	
<b>Section 1: Looking Back report 2017/18</b>	
<b>We want your views on how well the DNOs have performed over the last regulatory year</b>	

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 <b>a)</b> What did the DNO do? <b>b)</b> How did the DNO do it <b>c)</b> 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 SPEN 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 SPEN manager level resulted in the one reported knockdown being resolved quickly.</p> <p>Openreach has only had one FTTC knockdown in the 12 month period being reported and did not have to escalate to SPEN senior management to resolve. Openreach would welcome further engagement with SPEN to confirm the process used, to ensure that a repeatable successful process is in place for any future knockdowns.</p> <p>Openreach note the inclusion of regional SPEN management contact details on pg 48 &amp; 49 suggesting SPEN approach may be to devolve responsibility to management who can support locally in resolving issues more swiftly. In general, Openreach experience across all DNOs has been that local DNO engineers who understand the importance of the broadband infrastructure are happy to support quick resolution for Openreach and our customers, without defaulting to the New Connections processes (which are not suitable for the power restoration of telecommunications infrastructure).</p>							
The DNO's work plan								

4. <b>Objectives:</b> 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 SPEN. As a result the work plans do not take into consideration the needs of Openreach.  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.			
5. <b>Actions:</b> 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).  No comments on the basis that DNO outputs bear no real relevance to the issues that Openreach face.			
6. <b>Outputs:</b> 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?	Openreach review of the ICE plan (pg 8 & 9) note that there is a wide distribution of stakeholders including customer surveys. Openreach question SPEN approach to identifying 'key players' and customers and if the number of connections is a consideration in customer segmentation and considering stakeholder focus.  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.			
8. How satisfied are you with the DNO's overall performance?	very unsatisfied	not satisfied	satisfied	very satisfied
		X		

9. General feedback	<p>Openreach review of all of the 18/19 ICE submissions considers that the SPEN report is an easily accessible report for consumers; concise and well laid out and simple to download as a single document.</p> <p>The Openreach assessment of 'not satisfied' reflects no engagement from SPEN with Openreach or BT. This results in a current position of no confidence that SPEN understand Openreach requirements, as a customer with a very large number of connection points supporting critical national infrastructure.</p>
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## 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.</p> <p>Pg 15 of the ICE submission Forward Looking plan notes '<i>For the coming year, we will continue to focus on the things that really matter to our customers. Our various communication channels and our extensive engagement in some key areas have given us the opportunity to have face to face discussions with a larger number of our stakeholders than in previous years and they have been actively involved in the development of this year's plan.</i>'</p>
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	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 SPEN.
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 has resulted in the 18/19 work plan not seeking to address the issues faced by Openreach.</p> <p>SPEN 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 SPEN 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's 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 question 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](mailto: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](http://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

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- 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