

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.	UK Power Networks (UKPN). Our response relates to the DNO's plans as a whole, as BT and Openreach have infrastructure in each licence area. BT has over 34,000 connection points across the three UKPN 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 requires new unmetered connections for new Fibre to the Cabinet (FTTC) installations. BT also requires 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 UKPN 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 has required escalation to senior level within UKPN on each occasion. Following a chance meeting at a National Grid forum, a senior level meeting was arranged by Openreach which eventually led to ad-hoc resolution of knockdowns, via one person at a senior level within UKPN.</p> <p>There has been no further action from UKPN to seek to regularise a working arrangement to facilitate improved customer service for Openreach.</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	<p>Response to parts (a) and (b).</p> <ul style="list-style-type: none"> Metered customers considered only includes House Builders, no other business sector, so it does not seek to address Openreach requirements. Highway Services does not consider telecoms infrastructure, so does not seek to address Openreach requirements. 							

	<ul style="list-style-type: none"> • Workshops and Technical Forums are relevant to new connections, not reconnections or restoration of power for demand customers. • Despite the scale of the connections owned by BT and Openreach, no proactive engagement has taken place. • For the metered customer segment as referred to in the ICE document: <ul style="list-style-type: none"> a. A facility to enable customers to track progress or works would be welcomed. b. Receiving a customer survey frequently would be welcomed. c. We note that 600 UKPN customers have Customer Relationship Managers. No CRM is in place for BT and Openreach, despite the large number of our connection points, the issues we have raised with UKPN and the critical national infrastructure operated by BT and Openreach. • For the Highway Services Customers segment: <ul style="list-style-type: none"> a. We note that <i>'Every local authority...has a single point of contact... and regular dialogue'</i>. This would be welcomed by Openreach given the extent of our infrastructure in the street, and has not been proposed by UKPN. Nor has any approach been made by UKPN to Openreach to attend forums. b. The initiatives proposed by UKPN would all be welcomed by Openreach and would, on face value, help Openreach to work with UKPN on faults, repairs and restoration of power to telecoms infrastructure. c. Highway Services "service level agreement" has not been raised by UKPN during discussions. d. It is not clear if UKPN considers telecoms infrastructure in this Highway Services market segment. e. The potential for an SLA has been raised by Openreach but has not been progressed with UKPN.
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<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 the DNO's work plans 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>
<p>Your feedback on performance</p>	
<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>Given the issues raised with UKPN and the extent of Openreach infrastructure, we find it difficult to agree with the "AccountAbility" audit and the Key Strength of Inclusivity noted on p11 of the ICE report. There has been no approach from UKPN to Openreach to consider factors relating to critical national telecoms infrastructure.</p> <p>The separate AccountAbility assurance report (May 2018)¹ notes a recommendation to broaden the cross-section of stakeholders engaged by UKPN:</p> <p><i>"UKPN does not have formalised processes to ensure diversity and equal representation of relevant stakeholder groups present on its scrutiny panels. UKPN could consider the development of simple stakeholder selection criteria for these panels, for example diversity, level of seniority, technical expertise, and willingness to engage. This would support the panels as a continued effective, legitimate and consistent engagement mechanism to validate the Connections ICE Workplan and priority initiatives."</i></p> <p>Openreach review of the ICE plan notes that the stakeholder groups who UKPN engage with are predominantly Distributed Generation and the</p>

¹ See https://www.ukpowernetworks.co.uk/internet/en/have-your-say/documents/UKPN_Assurance%20Report%20Overview_180518.pdf page 4.

	<p>consultants and engineering firms who work for generators and also for demand connections.</p> <p>There is little evidence of electricity consumers being engaged in the process. Openreach considers 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	No. No engagement is in evidence with BT or Openreach despite the scale and critical nature of our infrastructure.
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and facilitating joint discussions where appropriate?	
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?	<ul style="list-style-type: none"> • ICE Initiative #19.18 contains elements that could support Openreach customer service and Openreach welcomes the opportunity to engage with UKPN, although no mention of this has been made in discussions with UKPN and no proactive engagement has been in evidence from UKPN to date. • Items in the 18/19 Highway Services initiatives work plan are welcomed and Openreach would welcome the opportunity to engage with UKPN on this. • The two following 'Strategy Area' topics are welcomed, as Openreach have particular requirements to deliver its services to Communication Providers: <ul style="list-style-type: none"> ○ Provide customers with more choice and flexibility over the services they receive ○ Enhanced Service Provision • In general, UKPN ICE provides strong focus on Highway Services customers, with actions for that sector which place it ahead of the ICE responses by other DNOs. However, it misses any focus on critical national telecommunications infrastructure which is a significant gap to be addressed. Openreach would welcome engagement with UKPN to supplement the proposed work plan to close this gap.
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.)?	No.
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	No. See comments against question 5 which are also relevant as answers to this question.

licensee provided robust evidence that it has pursued this?	
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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