

## 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 of 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.	Western Power Distribution (WPD).  Our response relates to the DNO's plans as a whole, as BT and Openreach have infrastructure in each licence area.  BT has over 35,000 connection points across the four WPD 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).
<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>Overall, WPD customer service and general performance is considered by Openreach to be the most proactive and positive amongst all the DNO companies.</p> <p>However, despite the very large number of connection points to WPD 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) has required escalation to senior level within WPD. Once this senior level engagement was established, WPD provided a Senior Manager Point of Contact to cover all 4 licence areas to address issues with knockdowns and with any other Openreach or BT issues relating to electricity connections.</p> <p>We note that the ICE report mentions that 75 customers have Senior Manager Point of Contact and that it was only by escalation that this was established for Openreach, despite the large number of connection points and criticality of national telecoms infrastructure.</p> <p>We also note that 'Build long-term relationships with stakeholders' is one of WPD principles for engagement (page 4). Openreach has not seen evidence of this in practice.</p>							
The DNO's work plan								

<p>4. <b>Objectives:</b> Have you seen the DNOs work plans?</p> <p><b>a)</b> Does it take into consideration your needs? If so, how?</p> <p><b>b)</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 WPD during our bilateral engagements/escalation meetings. As a result the work plans do not take into consideration the needs of Openreach.</p> <p>For example, while we welcome the informal way of working which has been established to help resolve one of our principal challenges (FTTC knockdowns) WPD has not been willing to formalise this into a service level agreement, which would provide Openreach with the ability to assure service to its customers (all Communications Providers) and regulator.</p> <p>We note that Service Level Agreements have been put in place by UKPN with its Highways Services Customers.</p>
<p>5. <b>Actions:</b> Do you think the DNO has delivered its work plan?</p> <p><b>a)</b> How has the DNO done this?</p> <p><b>b)</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. <b>Outputs:</b> Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why</p>	<p>Action number 2.1 in the 17/18 work plan refers to putting in place Senior Manager Point of Contact. Openreach welcomes that this is now in place, but note that it is only in place as a result of escalation of issues by Openreach.</p> <p>One KPI is the Major Customer Satisfaction Survey, addressing Customer Service as one of the 4 Stakeholder Priorities (page 9 of Appendix 2). BT and Openreach have not received such a survey, although the Senior Manager Point of Contact has been in place for around 12 months. Openreach would welcome the opportunity for this regular engagement.</p> <p>One initiative in the 17/18 plan is for 'WPD to engage with stakeholders to identify best practice and improvements to WPD's connection application process and documentation and implement improvements.' The outputs note that best practice is sought from other DNOs. We note that UKPN has defined Service Level Agreements for its Highway Services Customer segment which (although Openreach have not had sight of the details with UKPN) could potentially be replicated to meet Openreach requirements for</p>

	<p>power restoration of FTTC cabinets following a RTI and we would encourage WPD to consider this with Openreach.</p> <p>Openreach note the existence of a UMS User Group (Steering Groups, pg10) with workshops having been held during 17/18. Openreach has not been made aware of this forum to work with WPD to address issues.</p>			
<b>Your feedback on performance</b>				
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>Following review of the ICE plan Openreach notes that the stakeholder groups who WPD engage with are predominantly Distributed Generation and the 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 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	<p>While Openreach considers that WPD has been better than most DNOs in responding to our requirements (e.g. by taking action following escalations), we remain overall unsatisfied with the current power restoration arrangements for FTTC cabinets following a RTI.</p> <p>We still consider the material improvements in stakeholder engagement are required to progress and embed the service improvement requests made by Openreach.</p>			

## Section 2: Looking Forward plans 2018/19

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

<p>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>	<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 a Senior Manager Point of Contact being in place and previous escalation of issues.</p> <p>The ICE plan makes only one note of 'Telecoms Kiosks' under Unmetered Supplies in its Overview (pg1) but does not consider plans to resolve the issues Openreach has raised or make any other mention of this customer sector and this critical national infrastructure.</p> <p>Pg 5 of the ICE plan notes tailored engagement plans for different customer types. Openreach consider that it would be a 'Level 2' stakeholder. Until escalation by Openreach, we did not experience any consultation with WPD in the forms noted.</p> <p>Pg 6 of the ICE plan notes that a goal for WPD is to enhance engagement with Major Customers and that '<i>Outputs for this objective centre on ensuring we communicate effectively to gain feedback to better understand the requirements of major customers. Enhancing our engagement leads to improved focus on these customer requirements and drives the development of our priorities for ICE workplan initiatives.</i>' The lack of engagement by WPD with Openreach as a stakeholder has resulted in no actions or priorities being planned in the 18/19 work plan to address the concerns and issues we have raised with WPD.</p>
<p>11. Do you agree that the DNO has a comprehensive work plan of activities (with associated delivery dates) that will meet</p>	<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 WPD senior management.</p>

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>WPD 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>By comparison, UKPN work plan does provide for more focus on Highways Services Customers, but focusses almost solely on street lighting and misses any focus on telecommunication infrastructure.</p> <p>Openreach would welcome engagement with WPD 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?	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