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E14 4PU

Orthios Eco Parks (Anglesey) Ltd
The Moorings
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20/07/2018

OEPAL/OFGEM/2018/01

Dear Sirs,

Ofgem Consultation on ICE Performance

As part of Ofgem's information gathering for its 2018 DNO ICE performance assessment, we would like to provide our response concerning a single 11kV connection in the SPEN (Manweb) area. We accept that this is a sample of only one, but in the category of 11kV connections in the North Wales area, we believe it to be a significant proportion of the total in the area.

Our experience does not support a position of active engagement or customer focus by the DNO concerned. Indeed, our experience casts doubt on the awareness of the published Guaranteed Standards of Service by operations management as well as their application and monitoring within the organisation. We are very unsatisfied with the DNO's actual performance during both the offer and delivery phases of the project.

Orthios made a formal complaint to SPEN on 28.07.2017 citing specific instances where the Guaranteed Standards of Service had been missed. At a meeting on 30.08.2017 the matter of the standards was discussed, but the official response letter dated 18.10.2017 made no reference to any of the standards. A further meeting involving the District General Manager took place on 07.06.2018 at which the achievement of the standards was raised again. In its letter of response dated 22.06.2018, SPEN acknowledged its failure to achieve three standards and stated a regulatory compensation sum. As of the date of this letter, no monies in respect of that sum have been received by Orthios.

Being a relatively large new customer, in terms of North Wales, we would have expected a degree of prioritisation as suggested in the SPEN Incentive on Connections Engagement (ICE) Ofgem Submission (May 2017) document. This has now been accepted by SPEN and we understand that processes have changed since our experience. Unfortunately, at the time there was a lack of communication between connections design and connections delivery engineers. Indeed, we have evidence that the delivery engineer had not seen the design solution before 26 weeks into the project. Due to the difference in engineering, SPEN allocated the wrong line loss factor class id meaning that the customer is being effectively overcharged for losses. This has been reported to the registered supplier and direct to SPEN, but we have not received any confirmation of a correction being made.

The standard connection offer letter did not give a delivery or energisation date. Despite the point of connection being at a 33/11kV substation located <10m from our own site boundary, we were not given any indication of a delivery date until 30 weeks into the project. This date was at 34 weeks. A further 10 weeks were subsequently added because contractor commissioning engineers were not booked at the time the works order was placed by SPEN.

We are encouraged by the interaction with SPEN in recent weeks and the assurances of change and improvement on their part. We have offered a number of suggestions where performance could be improved, both within the regulated performance measures and more broadly in terms of how larger customers are handled and the necessity for dedicated project management. For Orthios, the matter will become closed on receipt of the regulatory compensation as SPEN's formal recognition of its inability to meet the minimum standard set by Ofgem.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Chris Pooley", with a horizontal line underneath.

Chris Pooley

Energy Trading Director

Orthios Eco Parks (Anglesey) Ltd