

Response template – Incentive on Connections Engagement

| Question | Response |
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| 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. | Scottish & Southern Electricity Networks (SSEN) Our response relates to the DNOs plans as a whole, as BT and Openreach have infrastructure in each licence area BT has over 17,000 connection points across the two SSEN 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 | | | | | | | | |
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| 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 SSEN 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 SSEN. After an initial bilateral meeting at SSEN offices, progress stalled and alternative senior points of contact were put in place by SSEN following a further escalation.</p> <p>Our senior contact with Craig Gilroy of SSEN (quoted on pg 27 of ICE) and Andrew Scott of SSEN (quoted on pg30 of ICE) was able to ensure that SSEN delivered some improvement in addressing our key customer service concern (power restoration of FTTC following knockdowns) but the way of working continues to be unsuitable for the ongoing requirements of Openreach and by extension our CP customers.</p> <p>SSEN commitment in the ICE '<i>Our focus is to continually identify where we can improve, deliver quality services and wherever possible exceed the needs of our connections customers. We work hard to deliver a comprehensive engagement strategy to ensure that we capture valuable feedback throughout the year. I encourage all our connections stakeholders to continue to engage with us as we move forward and deliver our Looking Forward commitments</i>' has not been carried through following our escalations, with no regular single point of contact having been clearly</p> | | | | | | | |

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| | <p>established. No ongoing engagement plan is in evidence with BT or Openreach. We would welcome ongoing regular dialogue with SSEN to enable Openreach to deliver customer service improvements to our CP customers</p> <p>We recognise that our civils contractors have engaged with SSEN (quote on pg 8 from Morrison Utility Services) but this has not resulted in further consideration of our requirements for customer service improvements</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 SSEN 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 principle challenges (FTTC knockdowns) SSEN has not been responsive to requests to formalise this into a service 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. 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>Openreach note that Connections Customer Steering Panel meetings, Unmetered Workshops and a Demand Event (pg11, 12) have been held during 17/18. Despite escalations, Openreach has not been made aware of these forums to work with SSEN to address service questions.</p> |

Your feedback on performance

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| 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>The Connections Customer Steering Panel (CCSP) is noted on pg8 to contain have strong representation from Demand Customers (32% of members)</p> <p>Openreach review of the ICE plan note that the stakeholders who SSE 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>Despite the numbers noted in the CCSP, 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 | <p>Openreach review of all of the 18/19 ICE submissions considers that the SSEN report is the most accessible report; concise and well laid out and simple to download as a single document.</p> | | | |

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?

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.

Pg29 notes the development of an improved Customer Relationship Management System. The details given suggest opportunity to support Openreach requirements and we look forward to engagement from SSEN on this.

Pg31 notes that an Unmetered Workshop was held in May 2018. Despite the previous escalations no notice of this was received from SSEN. Future planned workshops do not seem to have content which would seek to address the issues faced by Openreach, probably as a result of no further engagement despite the escalations raised.

Pg32 notes an 18/19 Commitment of '*Provision of additional contact information and escalation processes. We will complement our existing contact guides by providing additional contact hierarchies for other areas of our connections business (e.g. flexible connections) which will include information on their escalation processes*' Openreach welcome this move to support our business needs in the short term, while Business as Usual processes are established to provide long term resolution. We would welcome SSEN engagement with Openreach on this Commitment.

Pg41 has one single bullet point referring to 'Telecoms Kiosks' within the Unmetered connections market segment. Despite the issues previously raised with SSE there are no specific workstreams to address these challenges, as a result of no engagement by SSEN with Openreach as a major connection stakeholder.

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| 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 SSEN senior management.</p> <p>SSEN 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 SSEN 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 point 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

- 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 |