SP ENERGY NETWORKS

Customer Service

Steve McMahon
By email to: Steven.McMahon@ofgem.gov.uk

Date
18th December 2018

Contact / Extension
Kendal Adams
0141 614 7901

Dear Steve,

Consultation on changes to the arrangements for 'Clock Stopping'

SP Energy Networks (SPEN) represents the distribution licensees of SP Distribution plc and SP Manweb plc. We own and operate the electricity distribution networks in the Central Belt and South of Scotland (SP Distribution) which serves two million customers, and Merseyside and North Wales (SP Manweb) which serves one and a half million customers. We also own and maintain the electricity transmission network in the Central Belt and South of Scotland (SP Transmission). Please find our response to this consultation in the appendix.

We welcome the opportunity to respond to this consultation. If you would like to discuss any of the points raised, please do not hesitate to contact me further.

Yours sincerely,

K Adams.

Kendal Adams
General Manager - Customer & Social Delivery
SP Energy Networks

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Appendix- SPEN response to the consultation on changes to the arrangements for 'Clock Stopping'

Question 1: For each scenario please explain whether you agree with our view on whether licensees should, or should not, be able to stop the clock. Please explain the reasons for your view.

Scenario 1

We agree with Ofgem's view. The fire brigade or police may prevent access for a variety of reasons with restart times not always possible to agree at the time of prevention. It is also possible that the same emergency services are responsible for the supply interruption in the first place. Other utilities, such as gas network operators will also request supply interruptions in relation to safety of their operators, apparatus, property and members of public.

Scenario 2

We agree with Ofgem's view on the basis the scenario is designed to cover access to islands. There are very low volumes of islands within the SPEN area and access is via a tidal causeway. Unless emergency services dictate otherwise, then access is generally achieved. There are other scenarios where access to remote inland areas can be prevented. These are covered in our response to Question 2.

Scenario 3

We agree with Ofgem's view. SPEN field staff conduct safety related risk assessments before every work task and these are subject to change as surrounding conditions change. In all cases where we establish it is unsafe to work, clock stopping is *not* applied.

Scenario 4a

We do not fully agree with Ofgem's view. A customer will rarely request to be left off supply; however they may ask for restoration to be delayed. If we do require access to continue the repair, then clock stopping should be applied but only during the time we require access. This is the view of Ofgem. However, if we don't require access to continue the repair and the customer has requested us to delay work because, for example, noise, then we would return to complete the repair works at the agreed time. Clock stopping should also be applied in this circumstance. This would apply for single premise faults when the customer requesting a delay is the only customer off supply. In the case where multiple customers are off supply, then we would only clock stop when *all* customers request the delay for the same period.

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Scenario 4b

We agree with Ofgem's view. SPEN temporary solutions are capable of delivering a compliant connection to the customer. Thus, when a generator, loop service or wire back is connected, the customer is treated as being *on* supply unless the customer indicates a load related issue. In the case where the customer refuses a temporary solution and expresses no delay in the work to repair the fault, and where no access is required, then the clock shouldn't be stopped.

Scenario 4c

We agree with Ofgem's view. This is a common occurrence for commercial properties. Some customers prefer to be supplied by their own generator to maximise stability during the fault-finding and repair process. Other customers are happy to utilise their own generators even though the offer of a SPEN generator exists. Clock stopping is applied and the offer of reimbursement is made but not always accepted.

Scenario 5

We do not fully agree with Ofgem's view. Where access to fit a temporary supply (generator or wire-back) is not possible then we do not clock stop. However, where access is required in order to carry out testing in relation to the 'repair' of the fault then we would apply clock stopping since the work to restore customers is being prevented. This is only valid where no other reasonable options exist. Such testing may include neutral checks and phase rotation checks for 3 phase customers. Also, where the customer's property is evacuated due to recent localised flooding, a DNO may be in a position to restore supplies but is unable to obtain necessary access to the Customer's premise. The DNO should treat the time when they were able to restore supplies, but prevented from doing so by unavailability of access, as the restoration time.

Scenario 6

We agree with Ofgem's view. We do not stop the clock in this scenario and the opportunity is seen as limited. However, we agree with Ofgem's view.

Question 2: Please describe any circumstances not set out in this letter in which you think licensees should be allowed to stop the clock.

During severe weather which may not transpire to be an exceptional event, it is common for access to remote areas to be blocked by snow, trees or flooding. Government bodies or emergency services may not have officially prevented access. Where no alternative access exists which is required to repair or restore customers on a permanent basis then clock stopping should be valid. This could include access roads where travel by foot is unreasonable or where our connected assets and customers are temporarily positioned within a flood plain.

Question 3: Please highlight any concerns you have with the proposed legal drafting specifically, and whether in your view it would give effect to Ofgem's proposed position.

We believe that 1.1(c) could be expanded to ensure DNO's understand that refusal of a temporary restoration is different from the customer requesting to be left off supply.

Also, 1.1(c) could be further expanded, or an additional scenario created, for when the DNO requires access for purposes of testing in order to make permanent repair and restoration. For example, single premise faults and neutral checks required for some LV mains repairs. Furthermore, 1.1(c) should include the scenario where the DNO is in a position to restore supplies but unable to access the customer premises. For example, for polarity checks or phase rotation, or checks required to evacuated properties post flooding.
We also believe that 1.1(e) should treat the customer as restored once we have agreed to provide feedstock or costs of fuel.

Question 4: Should we remove the ability of licensees to use clock stopping? Please explain the reasons for your views.

Due to Clock Stopping volumes being low within SPEN, and the associated financial benefits are within the lowest of all DNO's, the removal of Clock Stopping would have a limited financial impact on SPEN.
However, Clock Stopping was originally designed to provide exemption when the DNO was being 'prevented' from restoring supplies. These scenarios still exist and are out with the immediate control of SPEN. Therefore, clock stopping should be retained with increased measures by Ofgem to monitor and ensure a consistent and fair application.