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Dear Louise,

Proposals to make modifications to the Regulatory Instructions and Guidance

Thank you for the opportunity to comment on the proposed changes to the Regulatory Instructions and Guidance documents. In the main, we are supportive of the suggested modifications and appreciate the clarity they bring to a number of areas.

There are a few areas, however, that we would like to add comment on in order to address slight inaccuracies or to provide our understanding or suggestion on matters that affect us directly as a Distribution Network Operator.

These are set out in the accompanying appendix.

Should you wish to follow up on any of the points raised in this appendix, please do not hesitate to contact me.

Yours sincerely,

Ross Bibby
Networks Regulation

APPENDIX

Annex A - Glossary

With regard to the definition for Smart Meter Interventions, we support the inclusion of the new definitions for Category A, B and C Smart Meter Interventions. We would, however, like to point out that the codes used are not defined in the MOCOPA. They are defined in the MRA and are referenced in the DCUSA.

In chapter 5 Asset Replacement Scope of Works, in the table for 33kV CB (Gas Insulated Busbars) (OD) (GM), Costs Outside Scope of Replacing Prime Asset it would seem that the added sentence is not complete. We assume this is a minor omission, but knowing the full sentence would be of benefit to us.

Annex B

CV8 Refurbishment No SDI

We would question the change in the refurbishment table from no. of refurbishments to km. The most common activity here would be the refurbishment of the termination. We feel that counting the number of units refurbished is more appropriate than the length of cable replaced, which we would interpret as asset replacement.

CV34 Smart Meter Intervention DNO

We fully support the inclusion of Process B (Only applies to category B defect notifications) and believe there is merit in introducing a similar process to identify reported Category A defects. The current process A relies on a comparison of datasets, i.e. the cross referencing of the reporting of resolved defects against a report of smart meter installations. The new Process B requires a positive action to be undertaken on the part of the meter operative to report a defect in a smart meter to the relevant DNO and we would like to see a similar approach taken for the reporting of Category A defects.

We include the following text for consideration, which follows the process proposed for Category B defect notifications:

'Process X (Only applies to category A defect notifications).

When a Meter Operator notifies a DNO of a category A defect via telephone it is mandatory for them to confirm whether the defect driver is in relation to a smart/non smart meter visit. This is confirmed during the reporting process and the information is recorded by the DNO in their defect management system. The requirement to report this information is detailed in the MOCOPA guidance document.

Where a DNO has received positive indication that the defect is smart meter installation driven then this is sufficient to allow subsequent rectification works to count as a 'smart meter intervention' in the year that the rectification works are undertaken, rather than in the year the smart meter is installed where the two are different. Extra care will be required to avoid double counting.

Note, for the avoidance of doubt and based on the licence definitions of a smart meter intervention, if you do one or more activities in a regulatory year as part of the same smart meter installation, this counts as one intervention in the year. If work is carried out in subsequent regulatory years as part of

the same smart meter installation, this is not counted, as the intervention will have been recorded in a previous year.’

Annex F – Interruptions

Clock stopping – We support the proposed new text, which elaborates on the environmental factors determining when the clock can be stopped with regard to length of interruptions. However, by proposing to delete the existing text, there is now no allowance for when required access to a customer’s premises is unavailable. This needs to be accommodated within the revised drafting and not lost, as is the currently the case.

We would also like to raise an additional point about factors affecting access. We believe we are the only DNO that would be affected by this. As we have approximately 40 inhabited islands as part of our distribution area we largely rely on scheduled ferries to gain access. If a fault is reported at a time when we cannot gain access or get the necessary equipment to an island because either the ferries are not running due to bad weather or just because of the time of day, we would like to be able to stop the clock until we can gain access to the island.

Annex G – Connections

After review, we agree with the proposed changes to Annex G. However, we would like to take this opportunity to highlight a number of other areas where we would welcome clarity from Ofgem on the current reporting requirements.

1. The Glossary to the RIGS, Annex A, sets out the following two definitions:

“Quotation Issued Date - The Working Day on which the information was issued to the applicant, either electronically or in hard copy.”

and

“Quotation Offer date - The date on which the DNO dispatched the first quotation that is subsequently accepted by the connecting party. This must be assigned to the nearest working day with quotations offered after 5pm rolling into the next working day.”

The need for these two definitions is not particularly apparent. Furthermore, under Annex G of the RIGs, paragraph 3.13 states that:

“The issue date shall be recorded as the Working Day on which the information was issued to the Customer, either electronically or in hard copy. If it has been issued before 23:59 on a Working Day then it will have been deemed to have been sent on that Working Day.” The ‘issue date’ being the date that the relevant information or service is issued to the Customer (paragraph 3.12).

Taken together with the definition of ‘Quotation Issued Date’ in the Glossary, this appears to push the Working Day out to 23:59 for the purposes of issuing quotes, which is clearly at odds with the definition of ‘Quotation Offer Date’. We would welcome a clear steer from Ofgem as to what timeframes apply in what instances.

2. On pg. 67 of Annex G 10A we suggest that the wording is changed from ‘prescribed period’ to ‘agreed date’. In the ‘payment to customer’ column the wording reads as ‘prescribed period’

however for this service the date is agreed with the customer and does not have a prescribed period.

3. Extensions of time for completion of works on adopted highways Annex G differs from the Statutory Instrument (SI)¹:

- In Annex G (pg. 51) under 'New works order – completion of works on adopted highways', it states that extensions of time apply.
- In the SI under unmetered on *adopted* land (section 12(3)) it does not state if extensions of time apply. In comparison, for unmetered on *new* land (section 12 (2)) the SI does state that extensions of time apply.
- However section 12(3) (unmetered on adopted land) then refers to exceptional circumstances (under 12(4)), which then refers to extensions of time (section 16), which would then suggest that extensions of time do apply.

We would welcome clarification on whether extensions of time can be applied to 'New works order – completion of works on adopted highways'. We believe it makes sense that they can, but we would appreciate a definitive view.

4. 'Demand Connection' Annex A differs slightly from the SI:

- a. Annex A (pg. 60): "A new or modified connection (*excluding* any modification comprising only an alteration as a result of an alteration to the position of the meter) the purpose of which is to enable the premises to receive a supply of electricity from an Electricity Distributor's distribution system."
- b. Statutory Instrument (pg. 3): "A new or modified connection (*including*, for the purposes of regulations 4 to 7, any modification carried out solely to facilitate an alteration to the position of a meter) the purpose of which is to enable premises to receive a supply of electricity from an electricity distributor's distribution system".

We would welcome clarification on whether to continue including service alterations under LVSSA and LVSSB when reporting.

¹ The Electricity (Connection Standards of Performance) Regulations 2015