



Changes to clock-stopping in the interruptions incentive scheme (IIS)

Northern Powergrid's response to Ofgem's consultation

KEY POINTS

Clock-stopping is a valid part of the IIS arrangements but we agree with Ofgem that the diversity of electricity distributor (DNO) approaches to it necessitates changes to the regulatory instructions and guidance (RIGs). We have proposed extended drafting in that respect. Beyond this, we also think similar work is needed to remove inconsistency in guaranteed standards reporting.

- There are significant differences between DNOs in how IIS clock-stops are being applied, and this lack of consistency undermines Ofgem's tools of comparative regulation.
- Ofgem should revise the guidance on IIS clock-stopping in the RIGs to:
 - Ensure much greater consistency across companies;
 - Reduce the extent to which company policies can influence whether or not a clock stop can be applied; and
 - Gather targeted additional data, to allow closer monitoring over time, and inform any further incremental adjustments necessary to improve consistency in future.
- Consistency with the terms of the ED1 settlement should be retained, as other approaches could undermine certainty in the regulatory settlement. The clock-stop for issues relating to access should therefore be retained, albeit with changes in the guidance necessary to reduce scope for different interpretations.
- Ofgem should also put in place a clearer set of rules covering clock stopping in response to customer requests, to reduce the current scope for discretion, and to ensure the use of clock stopping is balanced by the interests of customers who might want their power restored.
- We have therefore proposed with this response an extended set of Ofgem's new IIS clock stopping guidance that would help achieve all of these objectives.
- There are also similar (and related) issues with guaranteed standards reporting which should be addressed in the near term as well. These issues include DNOs:
 - Applying clock stops to guaranteed standards when this provision does not exist; and
 - Failing to report instances where the DNO has failed a guaranteed standard but has an exemption from making a payment in respect of that failure.
- We expect that these issues will be fully-addressed separately from this consultation.

1. Overview

1. Northern Powergrid welcomes Ofgem's consultation, which represents a good opportunity to clarify the circumstances in which IIS clock stops can be used. Northern Powergrid was the DNO that started the process that brought these inconsistencies to light, via Ofgem's quality of supply working group, and it seems an appropriate conclusion of that process that greater consistency would be brought about through RIGs changes.
2. We set out our detailed responses to Ofgem's consultation questions in section 2 below.
 - a. In response to **question 1**, we first set out the objectives we think Ofgem should consider in evaluating each of the scenarios, and then our views on each of Ofgem's scenarios in turn (where we agree with most but not all of Ofgem's views).
 - b. In response to **question 2**, we set out our biggest area of difference; i.e. that Ofgem has omitted several scenarios where clock-stopping is currently permitted, because access is not possible, and that these clock-stops should be retained (albeit with greater consistency in application and clearer reporting).
 - c. When it comes to Ofgem's **question 3**, on whether clock-stopping should be removed, we think that it is a legitimate part of reporting against the ED1 settlement and should be retained. We do however think that Ofgem should make clear in the guidance that the Electricity (Standards of Performance) Regulations 2015 do not include the concept of clock stopping and, therefore, the clock cannot and, indeed, must not be stopped for the purpose of performance against the guaranteed standards.
3. As we highlight in our responses to question 1 we think that achieving consistency will require more extensive guidance than Ofgem's initial proposal. For this reason we suggest an alternative approach to Ofgem's drafting, which is set out at **appendix 1**.

2. Responses to Ofgem's consultation questions

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.

4. In general we think that Ofgem should:
 - a. Maintain all of the clock stops legitimately allowed under the ED1 settlement;
 - b. Ensure much greater consistency in application across DNOs, through extended drafting of the guidance that clarifies when clock-stops can and cannot be applied, and also addresses some obvious inconsistencies inherent in the existing drafting;
 - c. Reduce the extent to which a DNO's own policies can influence whether or not a clock stop can be triggered; and
 - d. Gather targeted additional data, to allow closer monitoring over time, and inform any further incremental adjustments necessary to improve consistency in future, including a full breakdown of clock stopping causes, and reporting by DNOs of the value of each clock stop reason in the relevant year.
5. Below we assess each of Ofgem's scenarios against these objectives.
6. We have also disambiguated scenario 4a into two parts (part 1 and part 2), since Ofgem's title and description conflate the distinct clock stops allowed for under paragraph 2.45 and paragraph 2.47.¹

Scenario 1: emergency services or other utilities prevent access to assets

7. It is currently possible to stop the clock when explicit instructions from emergency services, government authorities or other utilities prevent a DNO from gaining the access necessary to its assets in order to restore supplies (under paragraph 2.46), and we would apply a clock stop in these circumstances.
8. We agree with Ofgem that clock stopping should be retained in these circumstances, for consistency with the basis on which the ED1 settlement was established.
9. In addition to Ofgem's proposals, we think DNOs should be required to report a breakdown of applications of this clock stop showing the organisation that prevented the DNO from gaining the access necessary to its assets, as well as the value to the DNO of each clock stop reason (which we also believe should be the case in relation to all clock-stops).

¹ All paragraph references are to Annex F to the current RIGs v4.

Scenario 2: when a licensee is unable to access a remote geographical location, e.g. an island

10. It is currently possible to stop the clock when access to remote assets "is not possible" (under paragraph 2.44). We would apply a clock stop in this scenario, although rarely, and importantly only if there was no other accessible route to our assets.
11. Based on the objective we set out at paragraph 4.a, we do not agree with Ofgem that clock stopping should be prevented for the rest of the ED1 period in these circumstances. This would be inconsistent with the basis on which the ED1 settlement was established. However, we think that greater consistency is needed across DNOs on what is necessary for it to be "not possible" for the DNO to access its assets, and that reporting should be broken down across the root causes (in line with objective 4.d).
12. In respect of this specific scenario, we therefore think that Ofgem should:
 - a. Impose a requirement that the DNO has either (i) attempted to reach the assets in question and found that no route by normal transport modes allowed reasonable access, or (ii) found at the site of the assets that it is not possible to access them; and
 - b. Require that DNOs report their use of a specific clock stop reason (rather than a catch all as at present) to allow for ongoing monitoring.

Scenario 3: when it is unsafe to work (e.g. because of a severe weather event itself such as high winds, or after a severe weather event where an area is flooded)

13. We understand that some DNOs have applied clock stops under paragraph 2.44 ("access is not possible") on the basis that safety assessments by the DNO led it to conclude, under its own working policies, that it was not possible for the DNO to access the assets necessary to effect a restoration.
14. There are several very different interpretations of this clock stop across different DNOs. At one extreme, we understand some DNOs have applied widespread clock stops when they judge weather or road conditions make travelling by vehicle unsafe. At an alternative extreme, Northern Powergrid has not applied clock stops based on its own assessment of safe or unsafe working conditions. Instead, we have applied a more direct assessment of whether there is an obvious physical barrier that prevents access to specific assets by employees using their normal transportation, tools and equipment. We have also not used a clock stop when our own safety policies prevented work at a site (such as policies around wind speeds for working at height).
15. This is a difficult area in which we can see it will not be possible for Ofgem to achieve all the objectives that we set out in paragraph 4.

-
- a. On objective 4.a, consistency with the ED1 settlement, we can see the viewpoint that safety reasons could mean "it was not possible" for a DNO to access its assets, and thus qualify for a clock-stop, although we have never made such an assessment.
 - b. On objectives 4.b and 4.c, DNOs determine their own safe working policies, and therefore have a direct, material, influence on when clock stops can be applied on this basis. This will make it impossible to ensure consistency over time.
 16. We think that, balancing these objectives, the best route forward would be to define more specific criteria against which DNOs should assess access restrictions for the purposes of the IIS.² For instance, these could be:
 - a. Based on site specific assessments, rather than blanket catch all assessments;
 - b. Calibrated against objectively verifiable circumstances, e.g. specific wind speed thresholds measured at the relevant site for above ground working; and
 - c. Set to recognise the level of technology, to which it is reasonable to assume a DNO would have access (e.g. a four by four vehicle with snow chains in snowy conditions), whether or not the DNO operative who encountered the access issue was equipped with this technology.
 17. Whatever decision Ofgem comes to in respect of "safety" reasons for clock stopping, we think it is vital for consistency with the ED1 settlement that Ofgem retains the "access to assets is not possible" reason for a clock stop, at least where a reasonable person would assume that a DNO would be physically unable to access its assets. There are many objectively verifiable scenarios where this could be the case, such as cars parked directly over faults. Ofgem has omitted this clock stop from its proposed drafting and therefore we cover it in our response to question 2, below.

Scenario 4: when a customer requests to be left off supply

18. Based on the title and text of Ofgem's scenario, we think it is helpful to distinguish between two distinct reasons for clock stopping in the current RIGs:
 - a. Paragraph 2.45: the customer requests a delay to restoration **work**, e.g. to stop working overnight to allow the customer to sleep; and

² DNOs would of course remain responsible for the safety of their own staff at all times, and would need to use their own assessment of safe working conditions in deciding whether or not to continue work.

-
- b. Paragraph 2.47: the DNO is in a position to restore supplies but the customer requests to be left off supply or needs to reset their own equipment.

19. We have covered these under Part 1 and Part 2 below.

Part 1: when a customer requests a temporary delay to restoration work (paragraph 2.45)

20. The current RIGs allow for a DNO to stop the clock when a customer requests that restoration **work** be delayed. This happens in two circumstances:

- a. In most instances, it will be because a DNO would have to continue noisy or floodlit work overnight in a residential area, where the residents would instead prefer the restoration work to take place the morning so they can have a good night's sleep.
- b. In other instances, it will be because the fault needs to be made worse before it is made better (e.g. a customer has lost one phase of a three phase supply, so still has power on two phases, and will be cut off entirely when the faulty cable is cut as part of the restoration work). In such instances, customers often prefer to wait until a more convenient time, for example to allow the work to take place while they are away from home or when their business is closed.

21. The current RIGs also have a number of ancillary requirements to trigger the clock stop and it is entirely unclear whether different DNOs are following these requirements consistently or whether those requirements are sensible in absolute terms. For instance, the current RIGs require that "all Customers affected by the delay are in full agreement" but some customers might be non-contactable. Some DNOs might assume this means they are not affected by the delay, while others might assume this prevents a clock stop.

22. Similarly, the RIGs state that a DNO asking customers if they are willing to accept a delay in restoration is not a valid reason for a clock stop, while Ofgem's proposed revised drafting states the DNO should avoid prompting the customer. However, in overnight clock stop situations it might be reasonable for the DNO to let customers know for how long the disruptive work is likely to continue and that the DNO could instead come back in the morning, since this will help customers to make informed choices. Some form of "prompting" for customers may be necessary or unavoidable and different DNOs may read the current (and proposed) drafting about the conversations it is (or is not) permissible to have with customers differently to one another.³ A "cleaner" set of requirements for

³ In proposing edits to Ofgem's initial drafting, we have not removed the limitation on prompting customers, or tried to further define it. We note however that without a clear distinction between what constitutes prompting and what does

the clock stop, which limit the circumstances in which it can be applied, would therefore be appropriate to remove as many potential sources of ambiguity or interpretation as possible.

23. In creating these cleaner distinctions, it may be appropriate for the DNO to be allowed to stop the clock in respect of those customers that requested the delay or that will be affected by it and confirmed they did not mind the delay, but to leave the clock running for any customers who did not provide this confirmation or could not be contacted. This would balance the interests of customers who want work to be stopped with those who do not. We have proposed drafting in appendix 1 that we think would achieve this.
24. It would also be appropriate for "overnight" clock stops to be restarted at 07:00 as standard where the customer did not specify a start time (as previously agreed in Ofgem's Quality of Supply working group).
25. For completeness we also note that Ofgem's statement in the consultation that this form of clock stopping should only happen when "the licensee is unable to continue working to provide a restoration without access to the relevant customer's premises" is:
 - a. not relevant to this particular clock stop. The customer is actually asking for restoration **work** to stop. The fault (and all the necessary work) might well be located in the street outside the customer's premises; but
 - b. pertinent in relation to part 2 below (under the scenario in which a customer requests a restoration delay in order to test their own equipment) and to clock stops under the current "no access" clause, since in these scenarios there is no customer-driven need for DNOs to stop working on any assets that they can access.

Part 2: when a customer requests to be left off supply or to test their own equipment (paragraph 2.47)

26. Paragraph 2.47 allows a DNO to stop the clock under distinct circumstances from paragraph 2.45, in the following rare instances.
 - a. A customer suffering an interruption does not need a restoration at all, e.g. because the property is uninhabited and likely to be demolished or extensively renovated. In these instances it is reasonable for a DNO to not undertake a restoration, and to stop the clock instead, provided that the customer confirms that a restoration is not required at all; and

not, there is still likely to be differences in interpretation between DNOs. This clock stop would therefore warrant further monitoring to identify whether different practices do result in material impacts on reported performance.

-
- b. The customer might need to perform checks on their own equipment before power re-starts (e.g. commercial installations) and thus might ask for a temporary delay to restoration.
27. Since these are valid reasons for stopping the clock, we agree with Ofgem that they should be retained.
28. The current RIGs also require that the DNO be in a position to restore supplies when the clock is stopped. We agree with Ofgem that DNOs ought to follow this requirement when customers request a delay to restoration, but we do not think this should be limited to the time when access to the customer's premises is required, since it is possible under either 26 a. or 26 b. above that supply could be restored without any access to the customer's premises. However, the requirement to be in a position to restore supplies makes little sense when a customer doesn't want a restoration at all. We therefore think that the requirements should be carefully drafted in order to avoid unintended consequences.
29. The reporting arrangements should also be revisited, so these are reported as distinct clock stops (broken down by their root cause) rather than together with (and indistinguishable from) genuine temporary restorations, in order to provide Ofgem with the visibility necessary to monitor application of the clock-stop.
30. We have proposed drafting at appendix 1 that we think would achieve all of these points.

Scenario 4b: when a customer refuses a temporary solution, e.g. a generator

31. We understand that some DNOs have stopped the clock in this scenario, we assume under paragraph 2.27 (when they have been in a position to provide restoration via a generator but the customer has refused this) or possibly under paragraph 2.24 (the customer asks for restoration work to be delayed).
32. We do not believe that a clock stop can be applied in this scenario, since the customer has not asked to be left off supply (as they will still expect their supply to be restored, just not via the temporary solution on offer, which they may think is inadequate) so a paragraph 2.47 clock stop does not apply. They have also not have asked for restoration **work** to be delayed, and will explicitly expect work to continue on non-generation forms of restoration, so a paragraph 2.44 clock stop does not apply.
33. Based on the objective set out at paragraph 4.a, maintaining consistency with the ED1 settlement, we agree with Ofgem that clock stopping should not be allowed in this scenario.

-
34. We also believe that, in order to monitor consistency of DNO use of paragraph 2.27 for clock stopping purposes, it should be reported as a clock stop rather than being reported together with (and indistinguishable from) genuine temporary supply arrangements.

Scenario 4c: when a customer agrees to be left off supply because it has its own generator

35. We agree with Ofgem that it is sensible for DNOs to stop the clock in this scenario, provided that they reimburse the customer for the feedstock for the customer's generator, since the DNO has in effect restored the customer's supply at no cost to the customer.
36. By treating this scenario as an explicit clock stop, this will allow distinct reporting, for the purposes of ongoing monitoring, and also allow Ofgem to clarify that customers providing their own generator cannot be treated as a clock stop (or temporary restoration) unless the DNO provides or pays for the feedstock.

Scenario 5: when a licensee is unable to contact a customer to request access to undertake work necessary to restore supply

37. The scenario Ofgem describes relates to a DNO being able to offer restoration via a generator by providing a generator connected within the customer's premises, but a customer not being contactable to take up the offer.
38. None of the current clock stops would apply to this scenario, since:
- a. The DNO is able to gain access to the assets necessary to restore supplies (paragraph 2.44), provided that the "faulty" assets are located outside of the premises;
 - b. The customer has not requested a delay to restoration work (paragraph 2.45); and
 - c. The customer has not asked to be left off supply or for a delay in order that they can reset their equipment (paragraph 2.47).
39. However, although "generator led" clock stops of this type are not permitted, being unable to gain access to a customer premises is a valid reason for clock stopping under paragraph 2.44, where that access is strictly necessary to restore supplies (for instance because the DNO needs access to test a cut out or because a substation is behind locked gates within the customer's premises). We believe this form of clock stopping, which is clearly permissible under the current RIGs, should be retained but better reported. We cover this clock stop in response to question 2, below.

Scenario 6: when a demand customer's firm capacity is restored, but its non-firm capacity is not restored until later

40. This clock stop is included within the current RIGs and therefore, based on the objective we set out at paragraph 4.a, Ofgem should maintain it.
41. However, since it depends on the form of contract struck with the customer on connection, it performs badly against the objective we set out at paragraph 4.c, which is the extent to which a DNO's own policies could influence its ability to stop the clock. For example, a DNO could "switch on" the ability to use the clock stop through including provisions in connection contracts where the connected customer derives little or no obvious benefit from those provisions (e.g. because the DNO would not be permitted to charge a higher price for the connection even if the contract did not include this clause). This would be an obvious abuse of the clock stop.
42. We therefore think that Ofgem should explore the extent to which the clock stop is being used, and the contractual circumstances in which it is being triggered, before taking a final decision on whether to retain, remove, or modify the drafting to standardise its use (based on factors that the DNO does not control). This will require additional information from DNOs and further work to evaluate it.

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

43. Ofgem's proposed drafting omits entirely one of the main existing clock-stops, where access to assets necessary to fix a fault "is not possible". This pre-existing clock-stop covers many circumstances other than the "safety reasons" scenario described by Ofgem in the consultation, including instances where DNO access to assets necessary to repair a fault might be prevented because:
- a. the relevant assets are under flood water;
 - b. fallen trees are blocking all approach roads;
 - c. parked cars are over the relevant faulted cable and their owners cannot be located;
 - d. assets the DNO needs to access are within locked private property and the owners cannot be contacted;
 - e. access to a customer's premises is needed to replace a service cable, undertake safety checks, or check polarity, but the customer is not contactable or is unwilling to give access.

-
44. To achieve the objective we set out at paragraph 4.a above, Ofgem should therefore maintain this clock stop. However, a clearer set of reasons should be set out, rather than the current "it is not possible" wording, in order to standardise its use and allow for reporting of specific reasons. We set out a suggested list at appendix 1.

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.

45. We have proposed some changes to the draft wording for inclusion in the RIGs, given the comments we have made in this response and to clarify certain points. Please see appendix 1.

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

46. Clock stopping should remain in place for ED1 as:
- a. It is a legitimate part of the approach to reporting interruptions performance put in place at the outset of the ED1 period, and its removal within the ED1 period would undermine certainty in the regulatory settlement; and
 - b. The data on which targets were set included the effect of clock stopping, and therefore its removal would lead to inconsistency between the data used to set targets and ongoing performance measurement.
47. Whether or not to continue clock-stopping for the ED2 arrangements should be considered within the ED2 price review process, and after Ofgem knows the outcome of the current work to try and improve consistency in its use.
48. In saying this we note that DNOs are not able to use clock-stopping in relation to guaranteed standards, yet we understand some DNOs have approached the guaranteed standards as if clock stopping can be applied. We therefore think that the RIGs must make it clear that the clock stopping arrangements apply only to IIS and do not apply to the Guaranteed Standards of Performance. Similarly, Ofgem should ensure that the DNOs report all guaranteed standards failures, including where they have an exemption from making a payment for the failure (since the failure is still a failure and should be reportable as such). This may also be an area of significant inconsistency at present.

Appendix 1: Suggested alternative approach based on current drafting

49. We provide below our proposed revised drafting for the IIS clock stopping provisions, along with a version that shows changes relative to Ofgem's proposal in the consultation.⁴

Proposed revised drafting (clean version)

Clock Stopping

- 1.1. Clock Stopping applies only to IIS. DNOs must not apply Clock Stopping to the guaranteed standards of performance.
- 1.2. Clock Stopping is permitted in the following circumstances:
 - a) Where access to the DNO's assets that is necessary for the purposes of Restoration is explicitly or physically prevented either by an instruction from:
 - i) the Emergency Services; or
 - ii) a Government Department; or
 - iii) a Local Government Body; or
 - iv) a Utilityor by
 - v) the owner or occupier of the premises concerned; or
 - vi) physical barriers, including parked cars; or
 - vii) flooding at the site of the relevant asset; or
 - viii) high winds at the site of the relevant asset; or
 - ix) the closure of all normal vehicular transportation routes that lead to the site of the relevant asset, rendering it inaccessible to the DNO, due to:
 - a. road closures; and / or
 - b. fallen trees (such that a four wheel drive vehicle could not reasonably pass); and / or
 - c. flooding (to a depth in excess of that which might reasonably be traversed by a vehicle with four wheel drive that is suitable for off-road conditions); and /or

⁴ Although care has been taken to accurately represent changes it is possible some differences may not be shown.

-
- d. snow (to a depth in excess of that which might reasonably be traversed by a vehicle with four wheel drive that is suitable for off-road conditions and using snow chains); and / or
 - e. car accidents; and / or
 - f. closure of transportation service(s) by a third party operator (or operators);

provided that that Restoration cannot be achieved by the alternative means of some combination of remote switching, manual switching, inserting or removing links from link boxes, cutting electric lines or cables or the DNO effecting repairs to alternative faulted assets, and where the use of temporary generation is not economic, and that the DNO has undertaken an assessment at the relevant site of any factors physically preventing necessary access to its assets.

In the above circumstances, the DNO:

- x) May stop the clock for the duration of the period in respect of which access to its assets is prevented. Such a clock stop must only be in respect of those Customers for whom the access issues have prevented Restoration;
 - xi) Must not stop the clock where a Customer prevents access that would allow installation of a temporary generator, but does not prevent access that would allow other forms of restoration;
 - xii) Must, if applicable, keep auditable records of the instructions given by the relevant Emergency Service, Government Department, Local Government Body or Utility or the owner or occupier of the premises concerned and the times of those instructions and the attempts made to achieve Restoration by alternative means (in instances where the relevant instructions would not prevent Restoration by alternative means);
 - xiii) Must, if applicable, keep auditable records detailing the environmental and/or other factors that prevented access to the relevant asset and the attempts made to achieve Restoration by alternative means;
 - xiv) Must restart the clock as soon as access to its assets is available such that Restoration can be achieved; and
 - xv) Must include the reason for the clock stop (i.e. i) to viii) d. in the list above) alongside the relevant Incident in the QoS Reporting Pack.
- b) Where a Customer affected by an Incident requests that the DNO temporarily ceases work to achieve Restoration, for reasons limited to the disruption that the work is causing (or would cause), the DNO:
- i) May stop the clock for the period requested by the Customer in respect of that Customer (or, where the Customer requests that the DNO ceases work "overnight" but does not specify a time for work to restart, until 7:00 am the following day);

-
- ii) May stop the clock in respect of any other Customers affected by the Incident who provide the DNO with explicit confirmation that they are content for the Restoration to be delayed;

Provided that the DNO:

- iii) Does not undertake work at the relevant site at any times when the clock is stopped;
 - iv) Restarts the clock at the time the DNO agreed with the Customer that work would recommence to achieve Restoration, and at any times before this that the DNO resumes work at the site;
 - v) Keeps appropriate auditable records of the Customer's request and the period of time agreed with the Customer in respect of which work to achieve Restoration was to be suspended, and any subsequent confirmations from other Customers that they were content with this request;
 - vi) Ensures that the records kept under 1.2 b) vi) are clear; and
 - vii) Does not prompt a Customer to request Restoration at a later time in order to stop the clock;
 - viii) Does not stop the clock because the Customer rejects a Restoration using generation which the Customer considers would be disruptive.
- c) Where the DNO is in a position to achieve Restoration but the Customer requests that Restoration be delayed in order to allow the Customer to reset or test the Customer's own equipment, the DNO may stop the clock between the time it would have been able to achieve Restoration, but was prevented from doing so by the Customer's request, and the Restoration time; provided that the DNO:
 - i) keeps auditable records in respect of the request made by the Customer and the DNOs state of readiness to provide a Restoration at the time the clock was stopped; and
 - ii) includes details of the application of such clock stops alongside the relevant Incident in the QoS Reporting Pack.
 - d) Where a Customer requests to be left off supply because the Customer no longer requires the connection the DNO may stop the clock in respect of that Customer from the time the Customer made the request provided that the DNO:
 - i) restarts the clock if the customer withdraws its request to be left off supply (or requests that the pre-existing supply be restored prior to its disconnection or modification); and
 - ii) keeps auditable records in respect of the request made by the Customer; and
 - iii) includes details of the application of such clock stops alongside the relevant Incident in the QoS Reporting Pack.
-

- e) Where an Interruption occurs and the DNO has a Non-Firm Contract with the Customer, the DNO may stop the clock when Restoration of any minimum Agreed Capacity that may be specified in that Non-Firm Contract has been achieved, provided that the DNO:
 - i) is undertaking work to achieve Restoration of any maximum Agreed Capacity that may be specified in that Non-Firm Contract; and
 - ii) retains auditable records relating to the relevant connection agreement and the capacity restored at the relevant points in time; and
 - iii) includes details of the application of such clock stops alongside the relevant Incident in the QoS Reporting Pack.
 - f) Where the DNO provides the feedstock (either directly or by reimbursing the Customer for the cost of that feedstock) for the Customer's generator until Restoration is achieved; provided that the DNO:
 - i) retains auditable records in respect of the agreement reached with each such Customer, which clearly show that the Customer had chosen to use its own generator and that the DNO had either provided the generator's feedstock, reimbursed the customer for the reasonable cost of its feedstock, or entered into a binding agreement to reimburse the Customer for the cost of its feedstock;
 - ii) Does not stop the clock where the Customer uses its own generator and the DNO does not provide the feedstock (either directly or by reimbursing the Customer for the cost of that feedstock); and
 - iii) includes details of the application of such clock stops alongside the relevant Incident in the QoS Reporting Pack.
- 1.3. The DNO does not need to report Interruptions which last for less than three minutes after the clock stop has been applied and are due to the DNO using switching via automated equipment. However, the DNO must keep appropriate audit records of such Interruptions.
- 1.4. The DNO must provide in the QoS Reporting Pack a summary table showing the number of times each clock stop above was used and the financial value of each clock stop to the DNO, based on the post-sharing-factor incentive rates used in CRC2D of the licence (and ignoring the effect of any capping of total incentive values), including a break down by the relevant reason for the no-access clock stop.

Defined terms

The following definitions shall apply for the purposes of IIS:

Agreed Capacity

Agreed Capacity is either:

- a) the maximum capacity used in the calculation of the DNO's use of system charges; or
- b) for Customers who are not charged for use of system on the basis of maximum capacity, the lower of:
 - i) the number of phases multiplied by the nominal phase-neutral voltage (kV) multiplied by the relevant fuse rating; and
 - ii) the rating of the DNO's service equipment.

Emergency Services

Emergency Services means a Police Force, an Ambulance Service, a Fire and Rescue Service or Her Majesty's Coastguard.

Government Department

A Government Department means a department through which the government of the United Kingdom exercises its executive authority.

Local Government Body

Local Government Body means a unitary, county, district, borough, city or town council.

QoS Reporting Pack

The relevant quality of service worksheet the DNO is required to submit to Ofgem in accordance with section 2 of Annex F to the RIGs.

Restoration

Restoration means the point in time at which the Customer is able to use the Supply to any premises that has been interrupted in the same manner as that Customer could have used the Supply before the Interruption occurred.

Supply

Supply means the connection provided by the DNO to a Customer for a minimum Agreed Capacity at a particular location and, where an agreement exists for it, a maximum Agreed Capacity.

Utility

Utility means a company or other organisation that provides services relating to water, gas, electricity or telecommunications.

Proposed revised drafting (showing edits to Ofgem's proposal)**Clock Stopping**

- 1.5. Clock Stopping applies only to IIS. DNOs must not apply Clock Stopping to the guaranteed standards of performance.
- 1.6. ~~The DNO will only be permitted to stop the~~ Clock Stopping is permitted in the following circumstances:-
- a) Where access to the DNO's assets that is necessary ~~to restore supplies~~ for the purposes of Restoration is explicitly or physically prevented either by an instruction from:
- i) ~~the~~ Emergency Services; or
 - ii) ~~a~~ Government authorities Department; or
 - iii) ~~a~~ Local Government Body; or
 - iv) ~~other~~ Utilities (e.g. gas and water)
- or by
- v) The owner or occupier of the premises concerned; or
 - vi) physical barriers, including parked cars; or
 - vii) flooding at the site of the relevant asset; or
 - viii) high winds at the site of the relevant asset; or
 - ix) the closure of all normal vehicular transportation routes that lead to the site of the relevant asset, rendering it inaccessible to the DNO, due to:
 - a. road closures; and / or
 - b. fallen trees (such that a four wheel drive vehicle could not reasonably pass); and / or
 - c. flooding (to a depth in excess of that which might reasonably be traversed by a vehicle with four wheel drive that is suitable for off-road conditions); and /or

- d. snow (to a depth in excess of that which might reasonably be traversed by a vehicle with four wheel drive that is suitable for off-road conditions and using snow chains); and / or
- e. car accidents; and / or
- f. closure of transportation service(s) by a third party operator (or operators);

~~(and supplies provided that Restoration cannot be restored through other means such as remote switching or network reconfiguration and be achieved by the alternative means of some combination of remote switching, manual switching, inserting or removing links from link boxes, cutting electric lines or cables or the DNO effecting repairs to alternative faulted assets, and where the use of temporary generation is not economic, and that the DNO has undertaken an assessment at the relevant site of any factors physically preventing necessary access to its assets.~~

In the above circumstances, the DNO:

- x) ~~m~~May stop the clock for the duration of the period ~~where~~ in respect of which access to its assets is ~~denied~~ prevented. Such a clock stop must only be in respect of those Customers for whom the access issues have prevented Restoration;
 - xi) Must not stop the clock where a Customer prevents access that would allow installation of a temporary generator, but does not prevent access that would allow other forms of restoration;
 - xii) ~~The DNO m~~Must, if applicable, keep auditable records ~~detailing orders of the instructions given by the relevant eEmergency sServices, or gGovernment Department, Local Government Body or Utility authorities or the owner or occupier of the premises concerned and the times of those orders instructions~~ and the attempts made to achieve Restoration by alternative means (in instances where the relevant instructions would not prevent Restoration by alternative means);-
 - xiii) Must, if applicable, keep auditable records detailing the environmental and/or other factors that prevented access to the relevant asset and the attempts made to achieve Restoration by alternative means;
 - xiv) ~~The clock m~~Must be restarted the clock as soon as access to its assets is available ~~to provide a~~ such that Restoration can be achieved; and
 - xv) Must include the reason for the clock stop-(i.e. i) to viii) d. in the list above) alongside the relevant Incident in the QoS Reporting Pack.
- b) Where a Customer affected by an Incident requests that the DNO temporarily ceases work to achieve Restoration ~~work be delayed~~, for reasons limited to the disruption that the work is causing (or would cause), the DNO:

-
- i) ~~May~~ stop the clock for the period requested by the Customer in respect of that Customer (or, where the Customer requests that the DNO ceases work "overnight" but does not specify a time for work to restart, until 7:00 am the following day);-
- ii) May stop the clock in respect of any other Customers affected by the Incident who provide the DNO with explicit confirmation that they are content for the Restoration to be delayed;
- Provided that the DNO:
- iii) Does not undertake work at the relevant site at any times when the clock is stopped;
- iv) ~~The clock must be r~~Restarted the clock at the time, the DNO agreed with the Customer, that work would recommence to ~~provide a~~achieve Restoration, and at any times before this that the DNO resumes work at the site;-
- v) ~~The DNO must k~~Keeps appropriate auditable records of the Customer's request and the period of time agreed with the Customer~~delay to the time at~~ in respect of which work to ~~provide a~~achieve Restoration was to be suspended, and any subsequent confirmations from other Customers that they were content with this request;~~can begin.~~
- vi) ~~It~~ Ensures that the records kept under 1.2 b) vi) ~~it must be~~ clear that the Customer has chosen for the work on the Restoration to be delayed, and, where applicable, all Customers affected by the delay are in full agreement; and
- vii) ~~A DNO~~ Does not prompting a Customer as to whether it would accept having its ~~supplies~~request ~~r~~Restorationed at a later time ~~is not considered a valid reason for~~ in order to stop the clock stopping;
- viii) Does not stop the clock because the Customer rejects a Restoration using generation which the Customer considers would be disruptive.
- c) Where the DNO is in a position to ~~achieve r~~achieve ~~Restoration~~ supplies but the Customer either requests ~~to be left off supply,~~ that Restoration be delayed ~~or it has~~ in order to allow the Customer to reset ~~its~~ or test the Customer's own equipment, ~~then~~ the DNO may stop the clock between ~~treat~~ the time ~~they were~~ it would have been able to achieve ~~r~~Restoration supplies, but was prevented from doing so by the Customer's request, and ~~as~~ the Restoration time ~~and classify this as a temporary supply arrangement;~~ provided that the DNO:
- i) keeps auditable records in respect of the request made by the Customer and the DNOs state of readiness to provide a Restoration at the time the clock was stopped; and
-

-
- ii) includes details of the application of such clock stops alongside the relevant Incident in the QoS Reporting Pack.
 - d) Where a Customer requests to be left off supply because the Customer no longer requires the connection the DNO may stop the clock in respect of that Customer from the time the Customer made the request provided that the DNO:
 - i) restarts the clock if the customer withdraws its request to be left off supply (or requests that the pre-existing supply be restored prior to its disconnection or modification); and
 - ii) keeps auditable records in respect of the request made by the Customer; and
 - iii) includes details of the application of such clock stops alongside the relevant Incident in the QoS Reporting Pack.
 - e) Where an interruption occurs and the DNO has a Non-Firm Contract with the Customer, ~~for post-fault flexibility services with the Customer~~ the DNO may stop the clock. ~~The DNO can only stop the clock after when Restoration of the any minimum Agreed Capacity that may be specified in that Non-Firm Contract has been restored, achieved, and whilst it provided that the DNO:~~
 - i) is undertaking work to achieve Restoration of the any maximum Agreed Capacity that may be specified in that Non-Firm Contract; and ~~The clock must be restarted as soon as the maximum Agreed Capacity is restored.~~
 - ii) retains auditable records relating to the relevant connection agreement and the capacity restored at the relevant points in time; and
 - iii) ~~The DNO must notify Ofgem~~ includes details of these application of such clock stops alongside the relevant Incident in the QoS Reporting Pack.
 - f) Where the DNO provides the feedstock (either directly or by reimbursing the Customer for the cost of that feedstock) for the Customer's generator ~~for the period of time the Customer is not able to use its Supply~~ until Restoration is achieved; provided that the DNO:
 - iv) ~~The DNO must~~ retains auditable ~~documents explaining~~ records in respect of the agreement reached with each such Customer, ~~In the records it must~~ which clearly show that the Customer has chosen to use its own generator and that the DNO had either provided the generator's feedstock, reimbursed the customer for the reasonable cost of its feedstock, or entered into a binding agreement to reimburse the Customer for the cost of its feedstock;
 - v) Does not stop the clock where ~~The DNO asking a~~ Customer ~~to~~ uses its own generator and the DNO does not provide ~~ing~~ the feedstock (either directly, or by reimbursing the Customer for the cost of that feedstock) ~~is not a situation in which a clock stop would be permitted~~; and
-

- vi) includes details of the application of such clock stops alongside the relevant Incident in the QoS Reporting Pack.

- 1.7. ~~If the~~The DNO does not need to report ~~interruptions which lasts for~~ less than three minutes after the clock stop has been applied and are due to the DNO using switching via automated equipment, ~~then this does not need to be reported~~. However, ~~the~~ DNO must keep appropriate audit records of ~~these such~~ interruptions.
- 1.8. The DNO must provide in the QoS Reporting Pack a summary table showing the number of times each clock stop above was used and the financial value of each clock stop to the DNO, based on the post-sharing-factor incentive rates used in CRC2D of the licence (and ignoring the effect of any capping of total incentive values), including a break down by the relevant reason for the no-access clock stop.

Defined terms

The following definitions shall apply for the purposes of IIS:

Agreed Capacity

~~For the purposes of IIS,~~ Agreed Capacity ~~will be~~ either:

- c) the maximum capacity used in the calculation of ~~its~~ the DNO's use of system charges; or
- d) for Customers who are not charged for use of system on the basis of ~~its~~ maximum capacity, the lower of:
- j) the ~~number~~ of phases multiplied by ~~the~~ nominal phase-neutral voltage (kV) ~~multiplied by the relevant~~ fuse rating ~~(A)~~; and
- iii) the rating of the DNO's service equipment.

Emergency Services

Emergency Services means a Police Force, an Ambulance Service, a Fire and Rescue Service or Her Majesty's Coastguard.

Government Department

A Government Department means a department through which the government of the United Kingdom exercises its executive authority.

Local Government Body

Local Government Body means a unitary, county, district, borough, city or town council.

QoS Reporting Pack

The relevant quality of service worksheet the DNO is required to submit to Ofgem in accordance with section 2 of Annex F to the RIGs.

Restoration

~~For the purposes of the IIS, t~~Restoration means the point in time at which the Customer is able to use the Supply to any premises that has been interrupted ~~will be deemed to have been restored when the Customer is able to use the Supply to the premises~~ in the same manner as that Customer could have used the Supply ~~could have been used~~ before the iInterruption occurred ~~For the avoidance of doubt, this principle applies where a temporary generator is provided.~~

Supply

~~For the purposes of IIS,~~ Supply means the connections~~s-assets~~ provided by the DNO to a Customer for a minimum Agreed Capacity ~~at a particular location~~ and, where an agreement exists for it, a maximum Agreed Capacity.

Utility

Utility means a company or other organisation that provides services relating to water, gas, electricity or telecommunications.