



Competition in Connections Code of Practice – Consultation Response Form

0001 – Self Determination of Point of Connection by an ICP

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Response Deadline: 17:00 Monday 8 February 2016

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Confidential?:	No
If confidential, please specify why¹:	N/A

¹ All responses marked as confidential will not be published on the Competition in Connections Code of Practice website. However, all response forms will be made available to all working group members and the Governance Panel to view.

Questions

1. Do you agree with the amendments to paragraph 4.6.2 of the Code of Practice? (see Appendix One)

Northern Powergrid has concerns with the proposed wording for the legal text. We have no issues with the intent here but feel the proposed word change from 'Such information *may* include, to 'Such information *will* include' makes the action compulsory and there may be occasions when a DNO does not have the information in the list proposed for 4.6.2. For example, not every DNO has load information for the Distribution System as they don't have MDIs.

Making it compulsory to supply the listed data could also be at odds with paragraph 4.6.1 – (i) which requires DNOs should provide such information as the ICP is reasonably likely to require in order to assess the PoC; and (ii) that the availability of that information to the ICP should be the same as its availability to a DNOs own designers' (which includes normally being available 24/7). The stipulation in para 4.6.1 deliberately allows DNOs and indeed calls for them to tailor what they provide in any given case to what is reasonably required in that case. Creating a non-negotiable list in para 4.6.2 cuts across that.

We would suggest rewording 4.6.2 to read:

'Where appropriate and available, such information should include:'

2. Do you believe any of the items listed in revised paragraph 4.6.2 to be unnecessary or not required?

No, we don't. Where this information is available to the DNO's own designers then it should be made available to ICPs on an equivalent basis. However, it has to be recognised that such information can only be provided where the DNO has it which may not be the case in all situations.

3. Do you believe there are any other items that should be included in the paragraph 4.6.2 listing?

No we don't.

4. Do you agree with the use of the market segments in the template in 4.12.1?

Yes, it makes sense to use the same market segments used elsewhere for competition in connections and to include the three UMS market segments even though the answer from DNOs may well be similar for all three.

5. Do you believe any of the items listed in the template in 4.12.1 to be unnecessary or not required?

The various unmetered breakdowns could be consolidated into one general unmetered market segments but for consistency we'd rather include the three UMS market segments even though the answer from DNOs may well be similar for all three. While this may be the case now, including all three UMS market segments allows scope for them to differ in future.

6. Do you believe there are any other items that should be included in the table in 4.12.1?

Would it be beneficial to indicate the maximum load that could be connected as an unmetered supply? (I think I would put this in the comments box we are allowed to fill in).

7. Do you agree with the criteria used in the template in 4.12.2?

Yes we do.

8. Do you believe any of the items listed in the template in 4.12.2 to be unnecessary or not required?

No we don't.

9. Do you believe there are any other items that should be included in the table at 4.12.2?

No with our current experience we think this is sufficient but note that it may have to change over time as we gain a better understanding of the difficulties ICPs have using the various standard design matrices.

10. Do you agree that the modification proposal better meets the Code of Practice relevant objectives? (as shown in paragraph 4.5)

Yes we do. We think this is as far as we can go towards 'best practice' with the limited experience of the new processes introduced by DNOs and being used ICPs. We believe further harmonisation will take place in time as DNOs and stakeholders become more comfortable with the new processes.

11. Do you have any other comments or observations you would like the working group to take into account?

The limited experience we have of ICPs utilising the changes brought about by the introduction of the new Competition in Connections Code of Practice makes it difficult to do more as we don't have a clear idea what 'best practice' looks like. We expect this to change as ICPs make more use of the options presented to them and when this happens we expect more changes to the CiC Code of Practice will be necessary.