

Competition in Connections Code of Practice – Consultation Response Form

0002 – Self-Design Approval Processes

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Response Deadline: 17:00 Wednesday 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¹ All responses marked as confidential will not be published on the Competition in Connections Code of Practice website.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 the process in Figure Five?

Yes

2. Do you agree with the amendment to paragraph 4.16.3?

Yes

3. Do you agree with the use of the Relevant Market Segments in Table One?

Yes

4. Do you agree that Table One will enable DNOs to outline the criteria by which an ICP can approve its own designs? Please give supporting reasons.

Yes, ICP's need to understand what options for the different market segments are available within the different DNOs and this will be a good test to benchmark each of the DNOs.

5. Do you agree that Table Two will enable DNOs to outline the criteria that dictate when an ICP can approve its own designs? Please give supporting reasons.

Yes, although this is very high level it gives each DNO the opportunity to show what an ICP needs to do, or not do, to move through the various levels that a DNO may prescribe.

6. Do you agree that no additional DNO information, other than that provided by DNOs for the self-determination of POC in section 4.6.2 and for 4.16.3 of the Code of Practice, is required for an ICP to do self-design approvals? Please give supporting reasons.

We agree as long as the DNO publishes all of the relevant data required to produce a design via its web site or other electronic means.

7. Do you consider that the modification proposal better meets the Relevant Objective 2.3.1 a) iii) of the Code of Practice i.e. “harmonising, to the fullest extent reasonably practicable, the Input Services provided by Distribution Service Providers? Please give supporting reasons.

It could do this if all DNOs take the same view and work together to give all of the relevant information required. We also believe that the DNOs need to ensure that their staff do not take an overzealous view on Design approval and treat the ICP in the same way as they do their own business. We note that a number of DNOs do not peer check their own designers work and do not have a similar process for their own staff. We also believe that an accredited ICP should be considered as competent as the DNOs staff and move down the table and have more designs approved by the DNO, rather than work their way up a table. This would ensure that the DNOs do not provide a higher input service level than is required.

8. Do you consider that the modification proposal better facilitates competition in the market for new electricity distribution connections? Please give supporting reasons.

Yes, providing the areas mentioned in question 7 are resolved.

9. Do you agree that, given these proposals are accepted, Section 4.17 in the Code of Practice should be deleted? Please give supporting reasons.

Yes

10. Are there any alternative solutions or matters that should be considered by the Self-Design Approval Working Group?

No