

Competition in Connections Code of Practice – Consultation Response Form

0002 – Self-Design Approval Processes

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¹ All responses marked as confidential will not be published on the Competition in Connections Code of Practice website.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

Yes, the amendment is minor and more accurately reflects the process flow.

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

Yes we do.

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

Yes, it makes sense to use the same relevant 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. While this may be the case now, including all three UMS market segments allows scope for them to differ in future.

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, we do. A simple 'Yes /No' option on its own would be insufficient but this layout means headline approval can be shown and the comment box allows a DNO to insert any limitations to design approval limits within a given market sector.

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.

Where a DNO wants to apply a stepped approval regime then this table will explain it. If full design approval is permitted from the start by a DNO, then the table can be used to show how the ICP can be promoted (or relegated) the inspection regime.

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.

Yes, all the information required to undertake Self-Design Approval work, has already been itemised in section 4.6 to allow an ICP to self-determine the POC and to design the extension assets. Self-Design approval is a process to check that these requirements have been followed and the information has been used correctly.

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.

Yes, the completed table format gives DNOs and ICP stakeholders the ability to compare and highlight differences, which is what is needed as the starting point for any future harmonisation work.

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

It doesn't overtly facilitate CiC but it does make it clear to ICP's and their customers exactly what they can do without the need for DNO involvement.

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, we believe the proposed modifications cover the requirements of section 4.17 and the paragraph can be deleted.

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

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.