

**Competition in Connections Code of Practice – Consultation Response Form**

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**0006 – G39 Self-Authorisation**

Email: [code.administrator@energynetworks.org](mailto:code.administrator@energynetworks.org)

Response Deadline: 5pm, 19<sup>th</sup> October 2018

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| <b>Role:</b>  | <b>DNO</b>   |
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| <b>Confidential?</b>                                    | <b>No</b>  |
| <b>If confidential, please specify why<sup>1</sup>:</b> | <b>N/A</b>   |

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<sup>1</sup> All responses marked as confidential will not be published on the Competition in Connections Code of Practice website.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

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### **1. Do you agree with the proposed amendments to paragraph 5.2.2 of the Code of Practice? (see Appendix One)**

SSEN fully supports the principle of DNOs allowing any accredited party to operate under G39 in relation to G39 activities without requiring any additional training or authorisation. We already allow such parties to carry out G39 activities on our network without requiring any further authorisation.

See further comments in answers to questions 3 and 4 of this response form.

### **2. Do you believe that the modification proposal meets the Code of Practice Relevant Objectives (as stated in paragraph 4.3) more effectively?**

Yes, SSEN believes that the modification proposal meets the Code of Practice Relevant Objectives (as stated in paragraph 4.3) more effectively in principle.

See further comments in answers to questions 3 and 4 of this response form.

### **3. Do you believe there is a better way in which the Code of Practice Relevant Objectives might be met than through the changes proposed?**

Yes, SSEN believes there may be a better way in which the Code of Practice Relevant Objectives might be met than through the changes proposed. We would propose simplifying this section of the Code of Practice to make it clear that DNOs should allow any party that is accredited to operate under G39 to carry out G39 activities without requiring further training or authorisation.

SSEN's view on this is aligned with the ENA SHE Committee's response which has been submitted separately.

### **4. Do you have any other comments or observations you would like the Working Group to take into account?**

SSEN fully supports the facilitation of competition in the market for new electricity distribution connections and already accepts training and / or authorisations relating to G39 authorisations accepted by a given DNO. SSEN also already allows a contractor to remove a DNO fuse carrier within street furniture and for that contractor to work within the vicinity of our DNO equipment, where such contractor has been appropriately trained, assessed as competent & authorised (in accordance with the requirements of the Highway Electrical Registration Scheme – HERS).