



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

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 All responses marked as confidential will not be published on the Competition in Connections Code of Practice website.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

Yes

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

No, the amended text should make it clear that the criteria to be set out by which an ICP can carry out its own design approval should be no more onerous than that employed by the DNO when giving the same authority to its own designers. We suggest the following:

4.16.3 DNOs shall complete and publish the following standard tables on their website which will set out the criteria by which ICPs can carry out their own design approval. Such criteria should account for accreditations and experience already held by the ICP and will be no more onerous than that employed by the DNO in its own connection services.

### **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.**

As it's drafted, Table One only serves to specify the market segment where the ICP has the option to approve their own designs. If read in conjunction with Table Two then the criteria by which an ICP can self-approve will be clear.

**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.**

No, when the ICP qualifies to approve their own design, they should immediately have the right to approve their own designs. The current template gives the impression that there are a number of different levels/stages that the ICP must go through before it can approve its own designs. We know that this is not the case across all DNOs, where SSE and NPG for example allow the ICP to approve their own designs based on their NERs accreditation. We believe that this is industry best practice. It should be the ICP choice to request that the DNO approves the design or instead undertakes an inspections of the ICP approved design.

Consideration should be given to using the table as set out below. This table better reflects what we should be trying to capture, i.e. the levels of inspection that apply when the ICP approves their own design. The table in the CoP should be blank however it has been populated by way of example.

**Table Two - Qualifying criteria that determines level of inspection of ICP self-approved contestable designs following commencement of Self-Design Approval by the ICP.**

<b>Level</b>	<b>Criteria</b>
1: DNO inspects 80% of ICP Approved Designs	No major N/Cs identified through 10 inspections
2: DNO inspects 40% of ICP Approved Designs	No major N/Cs identified through 10 inspections
3: DNO inspects 20% of ICP Approved Designs	No major N/Cs identified through 10 inspections
etc: DNO inspects 5% of ICP Approved Designs	No major N/Cs identified through 10 inspections

**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

**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

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

Yes, enabling Self Approval by ICPs will help the DNO meet its obligation to reduce the scope and cost of its input services.

**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, as this clause will no longer be required upon implementation of this CP.

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

None at this time