

17 August 2016

James Veaney
Ofgem
9 Millbank
London
SW1P 3GE

By email only to: connections@ofgem.gov.uk

Dear James

Re: Incentive on Connections Engagement Consultation 2016/17

Brookfield Utilities UK ("BUUK") welcomes the opportunity to respond to Ofgem's consultation on the looking back reports 2015/16 and the looking forward reports 2016/17 of each DNO's Incentive on Connections Engagement ("ICE") documents. BUUK is the parent company of electricity distribution licensees the Electricity Network Company ("ENC") and Independent Power Networks Limited ("IPNL"). Our licensees operate as Independent Distribution Network Operators ("IDNOs"), owning and operating 'last mile' networks which are principally provided to new developments. These networks connect to the distribution systems of DNOs. Additionally, BUUK is the parent of Power on Connections ("POC") which operates as an ICP undertaking work which may be adopted by BUUK's licensees or other distributors. BUUK's businesses operate across all Distribution Services Areas and as a result we engage with all DNOs on their approach to connections policy and in particular the development of Competition in Connections ("CiC").

We have previously engaged with Ofgem and all DNOs in the implementation of the CiC Code of Practice ("CiCCoP") and welcome this opportunity to see how the DNOs plan to implement and develop the provision of the CiCCoP to benefit of end consumers in the connections market. As such, one of our main areas of focus when reviewing the ICE documentation was looking at how the DNOs plan to ensure that they are compliant with the CiCCoP and how they planned to move it forwards in the coming year.

There are two further areas in which we are particularly interested and we believe are barriers to competition in connections.

- Provision of commercial contracts for emergency response cover to other distributors operating in the DNO's Distribution Services Area.
- Provision of inventory management services for Unmetered Supplies to other distributors operating in the DNO's Distribution Services Area.

We note that on the latter point above Ofgem considered, in their DCP203 decision document¹, that UMS customers are facing extra administrative burden by being required to register multiple UMS MPANs and this is leading to a potential barrier to competition in connections.

¹ https://www.ofgem.gov.uk/system/files/docs/2016/05/dcp203_d.pdf

Responses to the consultation questions which relate to our requirements as a connection stakeholder can be found in Annex 1 of this letter. Should you wish to discuss any of the points raised in this letter then please do not hesitate to get in contact with me.

Yours sincerely

Mike Harding
Head of Regulation

Anne 1 - Response template – Incentive on Connections Engagement July 2016

Question	Response
About you and your work	
1. What is the name of your company?	Brookfield Utilities UK
2. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)? Please indicate clearly in your response to the questions below whether your comments refer to the DNO's plans as a whole, or to one of the DNO's licence areas. If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.	Scottish and Southern Energy Power Distribution
Consultation questions	
Section 1: Looking Back report 2015-16	
<i>We want your views on how well the DNOs have performed over the last year</i>	
1. Are you satisfied that the licensee had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the licensee implemented its strategy? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	We are satisfied that SSEPD have a comprehensive and robust strategy for engaging with their connections stakeholders. The level and involvement of engagement is varied and this allowed the right people to be in the room at various events/forums

2. Are you satisfied that the licensee had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders? Do you consider that the licensee delivered its work plan? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	<p>We are satisfied that the work plan which the licensee had in place for the year 2015-16 was comprehensive and provided a range of activities to improve the experience of connection customers.</p> <p>The work plan allowed for the development of several important areas in competition in connections. We fully expect SSEPD to continue their work in this area.</p>
3. Do you consider that the licensee's work plan provided relevant outputs (eg key performance indicators, targets etc.)? Are you satisfied that the licensee has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?	We consider that the work plan provided relevant outputs by which SSEPD allowed themselves to be judged and believe that the output for each area of work was relevant to that work and measurable.
4. Do you agree that the licensee's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders? If not, has the DNO provided reasonable justification?	We agree that the strategy employed by SSEPD in relation to the regulatory year 2015-16 was fully informed by a broad range of connection customers and allowed them to develop and output an appropriate work plan.

Section 2: Looking Forward plans 2016-17

We want your views on what the DNOs aim to achieve in the coming year

5. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	We are satisfied that SSEPD have a comprehensive and robust strategy for engaging with stakeholders. We are pleased with the way that SSEPD have approached stakeholder engagement over the last year and would expect this level of engagement to continue over the coming year.
6. Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders?	The work plan of activities that SSEPD have proposed is extensive in terms of the needs of a wide range of connection customers. We have slight concerns that SSEPD have not undertaken to develop and improve the existing Competition in Connections Code of Practice. Whilst we expect them to be

<p>If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?</p>	<p>compliant with this we note that other DNOs have dedicated plans to develop the CiCCoP.</p> <p>SSEPD have not addressed the other issues which we believe to be barriers to competition in the provision on connections within their work plan, UMS inventory management and emergency response provision. We are aware that talks have been ongoing in these areas but we believe that they are important areas for connection customers and should be included in the work plan so that they are assigned KPIs and specific outcomes.</p>
<p>7. Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?</p>	<p>We believe that SSEPD have provided relevant and measurable outputs for each of their deliverable actions.</p>
<p>8. Would you agree that the licensee's proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?</p>	<p>There is sufficient evidence within SSEPD's document to illustrate the fact that they have received widespread endorsement for their work plan of activities. This also highlights the fact that the work plan of activities has been informed by a wide range of industry stakeholders and connections customers</p>

Question	Response
About you and your work	
1. What is the name of your company?	Brookfield Utilities UK
2. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)? Please indicate clearly in your response to the questions below whether your comments refer to the DNO's plans as a whole, or to one of the DNO's licence areas. If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.	Electricity Northwest
Consultation questions	
Section 1: Looking Back report 2015-16	
We want your views on how well the DNOs have performed over the last year	
4. Are you satisfied that the licensee had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the licensee implemented its strategy? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	We are satisfied with the engagement strategy that ENW has adopted over the previous year. We have found that their strategy is well targeted and provides for a more efficient engagement process than other DNOs.
5. Are you satisfied that the licensee had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders? Do you consider that the	We believe that the work plan of activities which ENW has undertaken is fairly comprehensive. They have been forerunners in our desire for DNOs to provide UMS inventory management and have worked in order to remove the need for design approval and allow self determination of points of connection.

licensee delivered its work plan? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	They have also undertaken to engage with IDNOs in delivering emergency response cover and have been working with parties to develop the necessary contracts.
6. Do you consider that the licensee's work plan provided relevant outputs (eg key performance indicators, targets etc.)? Are you satisfied that the licensee has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?	We believe that ENW's work plan provided some relevant outputs and marked KPIs. For instance the development of certain process and contracts. However in most cases these outputs were not always tangible or easy to measure.
7. Do you agree that the licensee's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders? If not, has the DNO provided reasonable justification?	We consider that the licensee has undertaken to ensure that ICP and IDNO views have been taken into account and inform their work plan. It appears that a broader range connection customers' requirements have also been considered in producing this work plan.

Section 2: Looking Forward plans 2016-17

We want your views on what the DNOs aim to achieve in the coming year

8. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	We believe that ENW have a strategy in place which provides sufficient engagement opportunities for connections stakeholders. Whilst there is not the same degree of engagement as some of the other DNOs we do not necessarily believe that is to the detriment of ENW's engagement strategy.
9. Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?	On the face of it ENW's work plan, with regards to competition in connections activities, is relatively sparse compared to other DNO's work plans. However, we note the work that ENW have previously put into ensuring that they can manage IDNO UMS inventories and the engagement with provision of emergency cover. Conversely, we do not believe that the necessary work to develop and embed the CiCCoP has been fully completed across the industry and we would prefer to

	see more concrete plans to ensure that this is progressed over the next 12 months.
10. Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?	We do not consider that the licensee has set relevant outputs in respect of the areas with which we are primarily concerned. There are no concrete performance indicators or milestones against which ENW can be judged and we believe that these are important in continuing to focus the licensee on developing all areas for the connections customers.
11. Would you agree that the licensee's proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?	As we have said in our response to question 6 we believe, superficially, ENW's work plan of activities is sparse (in relation to IDNOs and ICPs) however we believe that the activities which they are undertaking have been informed and endorsed by a wide range of connection stakeholders' needs.

Question	Response
About you and your work	
1. What is the name of your company?	Brookfield Utilities UK
2. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)?	Northern Powergrid – both areas.

<p>Please indicate clearly in your response to the questions below whether your comments refer to the DNO's plans as a whole, or to one of the DNO's licence areas.</p> <p>If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.</p>	
Consultation questions	
Section 1: Looking Back report 2015-16	
<i>We want your views on how well the DNOs have performed over the last year</i>	
<p>4. Are you satisfied that the licensee had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the licensee implemented its strategy? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?</p>	<p>We believe that the strategy for engaging with connections customers employed by Northern Powergrid over the previous year has been robust and effective. They have provided sufficient opportunity for connections stakeholders to engage with them.</p>
<p>5. Are you satisfied that the licensee had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders? Do you consider that the licensee delivered its work plan? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?</p>	<p>We are satisfied with many areas of the work plan that NPG have been carrying out over the previous year. We do not believe that it has been fully comprehensive as it did not address any of the following: -</p> <ul style="list-style-type: none"> • Inspection and Auditing requirements for ICPs • Provision of emergency response cover for IDNOs • Adoption of UMS inventories for IDNOs <p>Notwithstanding those deficiencies we are pleased that NPG have addressed the requirements of the CiCCoP within their 2015-16 work plan.</p>
<p>6. Do you consider that the licensee's work plan provided relevant outputs (eg key</p>	<p>We believe that NPG's outputs were sufficient in order for their connection customer to measure the success of their work plan.</p>

performance indicators, targets etc.)? Are you satisfied that the licensee has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?	
7. Do you agree that the licensee's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders? If not, has the DNO provided reasonable justification?	Yes, the NPG activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders. Whilst the activities do not entirely meet our own requirements it is fair to say that they represent the requirements of a broad range of stakeholders.
Section 2: Looking Forward plans 2016-17	
<i>We want your views on what the DNOs aim to achieve in the coming year</i>	
8. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	We are satisfied that the licensee has a comprehensive and robust plan to effectively engage with connections stakeholders.
9. Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?	<p>We do not believe that the licensee has a comprehensive work plan of activities in order to facilitate the requirements of their connection stakeholders.</p> <p>It is disappointing to note that NPG have not included any reference to the continued improvement to the Competition in Connections Code of Practice. Whilst we appreciate that this is a licence condition and NPG will be obliged to adhere to it anyway we see it as an important part of the connections market and would like to see how NPG are going to improve and adhere to the provisions of the CiCCoP. NPG have included plans to make their design approval process more efficient for ICPs. There are some more general areas of ICP design approval but we do not believe that these areas facilitate the minimum requirements of developing the CiCCoP.</p> <p>Furthermore NPG have also not addressed our further areas of concern within the connections market. These have been fully explained in our cover letter and</p>

	it is disappointing that NPG have not addressed these areas in their work plan of activities.
10. Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?	We do not consider that the target measures which Northern Powergrid have set themselves are sufficient in allowing its stakeholders to assess the effectiveness of their work plan. Where NPG have set themselves actions which are relevant to our requirements as a connections stakeholder the "Target measure" they are using to judge the effectiveness of the action does not allow stakeholders to quantify their success in most cases.
11. Would you agree that the licensee's proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?	<p>We find it difficult to understand that NPG's proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders.</p> <p>We are concerned that the work plan of activities for NPG has been largely informed by the requirements of end users for which NPG will build and own the connection works. There is little in the work plan which considers the requirements of IDNOs and ICPs.</p>

Question	Response
About you and your work	
1. What is the name of your company?	Brookfield Utilities UK
2. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)? Please indicate clearly in your response to the questions below whether your comments refer to the DNO's plans as a whole, or to one of the DNO's licence areas. If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.	Scottish Power – both areas

Consultation questions

Section 1: Looking Back report 2015-16

We want your views on how well the DNOs have performed over the last year

4. Are you satisfied that the licensee had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the licensee implemented its strategy? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	Scottish Power Energy Networks (SPEN) have provided a reasonably comprehensive plan for engaging with their connections stakeholders.
5. Are you satisfied that the licensee had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders? Do you consider that the licensee delivered its work plan? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	<p>We are satisfied with the work plan of activities that Scottish Power has undertaken over the last year in order to meet the needs of their connection customers. We note that They have identified areas over and above the Competition in Connections Code of Practice and we believe that this is the correct approach in order to meet the requirements of their connection customers. One of the main areas of concern we have raised in the cover letter is that the provision of emergency response cover for IDNOs and we are pleased that SPEN have undertaken to address this issue.</p> <p>We would have liked to see the combination of UMS inventories from IDNO within the work plan, however.</p> <p>Notwithstanding the lack of UMS inventories we are pleased with the work plan of activities from SPEN's looking back plan in respect of competition in connections.</p>
6. Do you consider that the licensee's work plan provided relevant outputs (eg key performance indicators, targets etc.)? Are you satisfied that the licensee has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?	<p>We believe that the SPEN looking back plan work plan report does not necessarily provide a full analysis of the outputs that were targeted in the previous year.</p> <p>Whilst they have provided some case studies to illustrate how they have met their targets there are no metrics in order to fully analyse how SPEN have achieved their work plan of activities.</p>

7. Do you agree that the licensee's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders? If not, has the DNO provided reasonable justification?	We believe that SPEN have undertaken a work plan of activities which have been informed based on the ongoing requirements of their connection stakeholders.
Section 2: Looking Forward plans 2016-17	
<i>We want your views on what the DNOs aim to achieve in the coming year</i>	
8. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	We are satisfied with the way that SPEN have engaged with their connection customers and continue to engage with their connection customers.
9. Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?	<p>We are satisfied that the work plan of activities which SPEN are looking to undertake over the forthcoming year are almost comprehensive with respect to our connection requirements. Continued development and adherence to the Competition in Connections Code of Practice is important and this has been addressed in the SPEN work plan.</p> <p>It is pleasing to see that they have included emergency service provision for IDNOs as an area they are looking to progress and engage in with IDNOs.</p> <p>We still believe that it is important for DNOs to address the issue of unifying IDNO UMS inventories. It has been noted that this is a barrier to competition in the connections market. Until such time as SPEN address this issue we are unable to fully endorse their work plan of activities.</p>
10. Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?	We are unconvinced that the KPIs which have been proposed for SPEN enable its stakeholders to fully assess their progress against the work plan. There are few quantitative measures which have been used in comparison to other DNO work plans and as such it may be difficult to measure SPEN's progress against other DNOs.

11. Would you agree that the licensee's proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?	We do believe that the proposed strategy has been derived and informed by a broad base of SPEN's connection customers.
Question	Response
About you and your work	
1. What is the name of your company?	Brookfield Utilities UK
2. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)? Please indicate clearly in your response to the questions below whether your comments refer to the DNO's plans as a whole, or to one of the DNO's licence areas. If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.	UK Power Networks – all areas
Consultation questions	
Section 1: Looking Back report 2015-16	
We want your views on how well the DNOs have performed over the last year	
4. Are you satisfied that the licensee had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the licensee implemented its strategy? If not, are you satisfied that the	We are confident that the strategy employed by UK Power networks will result in sufficient opportunity for us to provide input. We are pleased to see that they are intending on using CiC as one of the main segments to input into their connection policy.

licensee has provided reasonable and well justified reasons?	
5. Are you satisfied that the licensee had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders? Do you consider that the licensee delivered its work plan? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	We are satisfied in the way that UK Power Networks had a comprehensive work plan of activities in order to implement the mandated Competition in Connections Code of Practice. We do, however, note that the introduction and compliance to this Code of Practice is mandated in Part B of the licence. We would like to see UK Power Networks undertake other work in other areas that are important to us, as connections stakeholders. As an operator of IDNO networks one of the most important area which is not being addressed is the provision of Unmetered Connections management services for IDNO portfolios. As we have stated in our cover letter we believe that this is an important area in order to fully open the connections market to competition and as such we are unable to be fully satisfied with the UK Power Networks Work Plan until such time as this is included.
6. Do you consider that the licensee's work plan provided relevant outputs (eg key performance indicators, targets etc.)? Are you satisfied that the licensee has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?	We believe that, where an area of work has been undertaken, that the UK Power networks work plans have included relevant, realistic and tangible targets. We consider that the UKPN work plan to be a model template which could be used by the other DNOs in respect of the way that they have set out their deliverables and outputs.
7. Do you agree that the licensee's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders? If not, has the DNO provided reasonable justification?	We agree that, for the most part, UKPN's strategy was informed by their connections stakeholders. We do note that a large part of the Competition in Connections work was essentially mandated by the introduction of SLC 52 (albeit that this was a result of connections stakeholder views).
Section 2: Looking Forward plans 2016-17	
We want your views on what the DNOs aim to achieve in the coming year	
8. Are you satisfied that the licensee has a comprehensive and robust strategy for	We are confident that the strategy employed by UK Power networks will result in sufficient opportunity for us to provide input. We are pleased to see that they

engaging with connection stakeholders and facilitating joint discussions where appropriate?	are intending on using CiC as one of the main segments to input into their connection policy.
9. Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?	We are satisfied that UK Power Networks has a work plan of activities in order to further enhance implement the Competition in Connections Code of Practice. We believe that the development of the CiCCoP is crucial in furthering the needs of all connection customers. We would like to see UK Power Networks undertake other work in other areas that are important to us, as connections stakeholders. We have noted in our response to question 2 that there are still areas that we believe to be barriers to competition and that UKPN have still not addressed within their work plan of activities. Again, until such time as these are included we are unable to fully endorse the work plan as meeting our needs.
10. Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?	We believe that, where an area of work has been undertaken, that the UK Power networks work plans have included relevant, realistic and tangible targets.
11. Would you agree that the licensee's proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?	We would agree that the proposed activities have been informed and endorsed by connections stakeholders.

Question	Response
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1. What is the name of your company?	Brookfield Utilities UK
2. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)? Please indicate clearly in your response to the questions below whether your comments refer to the DNO's plans as a whole, or to one of the DNO's licence areas. If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.	Western Power Distribution – all areas
Consultation questions	
Section 1: Looking Back report 2015-16	
We want your views on how well the DNOs have performed over the last year	
4. Are you satisfied that the licensee had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the licensee implemented its strategy? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	Yes, we are satisfied with the strategy for engaging with connections stakeholders.
5. Are you satisfied that the licensee had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders? Do you consider that the	Yes, we believe that the work plan of activities, for the 2015-16 regulatory year was comprehensive to meet the requirements of WPD's connection customers. We consider that the licensee has delivered on its plan in respect of the areas with which we are concerned (see attached letter for specific areas). We note that WPD have led in the provision of emergency response cover to IDNOs over

licensee delivered its work plan? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	the previous year. We are appreciative that WPD have led in this area and have set a precedent for this.
6. Do you consider that the licensee's work plan provided relevant outputs (eg key performance indicators, targets etc.)? Are you satisfied that the licensee has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?	We consider that the outputs from the previous work plan are relevant and measureable. Although the development, embedding and implementation of the Competition in Connections Code of Practice was a difficult target to measure we believe that WPD have suitably adapted their outputs where required by CiCCoP developments.
7. Do you agree that the licensee's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders? If not, has the DNO provided reasonable justification?	Yes, we believe that this strategy was derived from a broad range of connection customers and their requirements.

Section 2: Looking Forward plans 2016-17

We want your views on what the DNOs aim to achieve in the coming year

8. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	We are satisfied with the engagement strategy of WPD.
9. Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?	<p>We agree that the work plan of activities which has been published by WPD will meet the needs of their connection customers. We are pleased to see that the continued development of the Competition in Connections Code of Practice is in the work plan and agree that its continued development and refinement is an important area for DNOs.</p> <p>Although WPD have made no mention in their work plan for providing emergency response cover to IDNOs we note that this has previously been</p>

	<p>agreed and do not, therefore, believe that its omission from the document is an issue.</p> <p>This also hold true for our issue surrounding adoption of UMS inventories. We note that WPD has been active in engaging in this area and we do not see its omission from the ICE work plan as an issue.</p>
10. Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?	Yes, we believe that WPD have set reasonable, relative and measureable KPIs for the coming regulatory year. The KPIs and targets are a mixture of qualitative and quantitative which enables WPD to easily be measured against them.
11. Would you agree that the licensee's proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?	We believe that the strategy, activities and outputs of WPD's ICE submission have been informed by a broad base of their customers.