

Hi

Thank you for the opportunity to consult the responses are based on the concerns that Westminster City Council have regarding DNO network connections, in response to:

**Open letter consultation on the Incentive on Connections Engagement: Looking Back reports 2015-16 and Looking Forward plans 2016-17**

The DNO for Westminster is UKPN

**Section 1: Looking Back reports 2015-16**

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?

UKPN are generally good at consultation across their UMS customer base explaining issues and expectation however the customer may not fully understand their rights or what they should expect as OFGEM don't explain and leave it to the DNOs to deliver.

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?

I am confident that they have plans that meet their requirements and are generally within the constraints of the rules set out by OFGEM however, I do not know if these will meet the requirements of the end customer which for the UMS market place is the general public. There is an aging network asset that does not appear to be seen any investment this asset must have a defined life and one assumes that it is monitored from a faults perspective and it would be good to understand at what point does the network become uneconomic? *(It is no good connecting a service to a life served network supply)*

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?

As above UKPN will be working within the guidance and their general approach is to deliver the best service that they can within the constraints set, the KPIs set by OFGEM were not shared with the clients in the past and visibility is poor in this market place. Effectively UMS is for the public sector use and therefore it should have a high level of visibility between client service and DNO license, this is not the case and therefore it is difficult to measure how good the service is between the only point of reference is historic and not holistic.

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?

I understand that any strategy need to look at the long term outcome and balance risk and cost however I have not seen any strategy from DNOs or OFGEM that faces up to the inevitable problem of a life served network that is failing, and adding additional connections to this poorly mapped and poorly understood network is probably not a sustainable solution for the UK.

## **Section 2: Looking Forward plans 2016-17**

5. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?

I think that UKPN will continue to do their best within the constraints that they work within, their performance is not too bad considering the environment that they need to operate within. I would ask both UKPN and OFGEM how can the service be adequately benchmarked? And What can I do if the agreed service level is not achieved!

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? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?

UKPN have worked hard to improve their business and this is apparent to the UMS sector however there is a reality in Westminster in many street there is limited network capacity to meet the requirement of a growing evolving city these may generally be small metered supplies but it return to the main point of my response investment (or lack of it) in the last mile of the network and not only the first mile. I accept that this is a simple view on the subject but Westminster enjoys a substantial network that is pre-war that is continuously failing.

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.)?

I'm sure that UKPN will meet the requirements that OFGEM set out, I'm not entirely sure that they will meet the requirements of the general public that require uninterrupted supplies and fewer interventions in the street. The Industry need to start considering "Connections" to new cable systems and substations to deliver the sustainable future that I'm sure is planned for within the RIIO.

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?

I don't know as you should have realised my concern is UMS and the lack of asset management. The visibility beyond my direct concern is limited and the

full proposal will be driven by business requirements and cost benefit considerations.

9. Where flexible connection offers are available, do you consider that the DNO's work plan for 2016-17 sufficiently addresses concerns about the uncertainty of curtailment levels? For example, do their plans ensure that stakeholders have access to the data they require for an investment decision?

I have no knowledge of this but a key deliverable for all DNOs could be demonstrating an ongoing dialog with City and Town planners investigating opportunities for collaborative project of asset replacement, reinforcement and improved infrastructure.

10. Where consortium connections are available, do you consider that the DNO's work plan for 2016-17 reflect requirements for clear and detailed information about where, how and under what conditions such projects can proceed?

I have no knowledge of this type project

11. Where flexible or alternative connections are not currently available in constrained areas, do you consider that the DNO's work plan for 2016-17 either include steps to provide information about when these types of connection will become available? Or that the DNO has justified why these are not available?

Sorry I'm unable to answer this question.

12. Do you consider that the DNO's work plans include appropriate engagement to ensure that network investment plans are well communicated to stakeholders, including when new capacity will become available?

Information is available but this could be clearer as there is not necessarily the focus required for all clients however in general there is an improvement plan published but who is measuring movement against plan and what are the consequence of failure or delay?

13. Do you consider that the DNOs' plans include appropriate activities to improve, where necessary, the provision of information on constrained areas of the network to provide better data about where connections may be viable?

The plan has been questioned as a little vague with regards the measureable and auditable outcomes.

14. Are there particular additional activities or outputs which you consider should be included in the work plan of activities to better facilitate grid connections?

All DNOs need to work with Local Authority and other Statutory Undertakes to instigate asset infrastructure investment Gas & Water companies are much further forward than electricity network owners

To clarify;

UKPN are in my opinion fairly good at facilitating UMS connection and the management team give the London Authorities a good deal of support in achieving their annual objective.

However, there is no clear benchmarking solution that the authorities can share and review to understand if improvement can be made. GSOPs may help OFGEN but the UKPN customers are not provided the information and I could not find anything regarding results on the OFGEM website (albeit it may exist)

The main concern for Westminster is that new connections are being made to network cabling which is effectively life served and therefore may potentially experience high fault levels.

For interest; UKPN fault management is significantly behind their connection management and it needs focused effort to improve it to the customer experience delivered by the connection service.

Happy to discuss.

Regards

Dave