

APPENDIX 1 Summary of responses to RIGs and associated changes

Set out below is a summary of the main points that have been raised by respondents in relation to the draft revised RIGs, published in December 2001. It also sets out Ofgem's response as reflected in the new version of the RIGs. Ofgem has also made a number of minor drafting changes where necessary to improve clarity, style and presentation as well as removing any inconsistencies in the document.

All paragraph numbers in this appendix refer to the draft version of the revised RIGs.

General

A number of companies noted that Ofgem uses both the terms 'embedded generation' and 'distributed generation' in various places in the document.

All references to 'embedded generation' have been replaced with 'distributed generation'.

A number of companies also suggested that references to 'supplier's fuses' were inaccurate. *Ofgem has amended the RIGs so that these have been replaced with the term 'distributor's fuses'.*

Section 1: Introduction

Ofgem did not receive any comments with respect to Section 1.

Section 2: Definitions, instructions and guidance for reporting the number and duration of interruptions to supply

One company felt that the clarity of the RIGs would be improved if specific definitions were introduced for 'long interruptions' and 'first interruptions', alongside the current definitions of 'short interruptions' and 're-interruptions'.

Ofgem does not consider this change to be appropriate. It is clear that an interruption can only occur as part of an incident and that an incident is always greater than 3 minutes in duration. Given this, and given both short interruptions and re-interruptions are explicitly defined, there is not a need to expand the definitions section to include long interruptions and first interruptions.

Key definitions (paragraph 2.3)

One company suggested a more appropriate title for this subsection should be 'Definitions of output measures'.

Ofgem has made this change.

One company suggested that the wording of bullet 3 should be amended to refer to "in less than three minutes" rather than "within a period of three minutes" for consistency with the licence condition.

Ofgem has made this change.

Incident (paragraphs 2.9 to 2.12)

A number of companies suggested that bullet 3 of paragraph 2.10 should not include the word "interruption", as this would lead to a circular definition. It was suggested that this be replaced with "disconnection".

Ofgem has made this change to improve clarity.

Pre-arranged incident (paragraph 2.14)

One company suggested that the definition of a pre-arranged incident should be amended to make it more consistent with other text in the RIGs.

Ofgem has made this change

Incident on other systems (paragraph 2.16)

One company suggested that the NaFIRS codes only allow recording against 'NGC', 'Embedded Generators' and 'Other DNO', and as such, there is no facility to identify 'other connected systems'. The company indicated that this amendment was also necessary to bullet 3 of paragraph 2.51 – 'Disaggregation by source'.

Paragraph 2.2 sets out that for the purposes of reporting under the IIP, companies must use the definitions contained in the RIGs. It is therefore not appropriate to make this change. The majority of such interruptions will in practice relate to incidents on the systems of other distribution businesses.

Incident start (paragraph 2.18 to 2.21)

A number of companies noted that the current drafting of 'incident start' has scope for misinterpretation. One company cited that the main reasons for possible misinterpretation were differences between 'incident' and 'suspected abnormality' and between 'the time of the first report of the incident' and 'report received time'. The companies put forward a number of suggested re-drafts.

Ofgem recognises that there was still some ambiguity in the December draft. The paragraphs relating to 'incident start' have been amended to reflect company comments and to improve clarity.

Incident completion and Temporary connection (paragraph 2.22 to 2.25 and 2.34)

One company noted that there is some confusion associated with the definition of 'incident completion'. The company indicated that this stemmed from the use of the term 're-interruption' in the same sentence as 'new incident'. It noted that if a further interruption is associated with a new incident then it cannot be a re-interruption. It also suggested that the determination of whether an incident was complete or not depended on whether temporary supplies had been used to restore supply. In the light of this, the company put forward some revised text to include temporary supply arrangements.

The same company also suggested possible definitions of both temporary connections and supply arrangements in paragraph 2.34.

Ofgem recognises that the drafting may have led to some misinterpretation and as such has made amendments to make clear that a special case applies when temporary arrangements are used to restore supplies. Ofgem has also incorporated the suggested definitions of temporary arrangements and temporary connections.

Another company suggested that the wording relating to non-damage incidents could lead to confusion, as there appears to be two three-hour time bands for re-interruptions.

Ofgem has deleted the paragraph relating to non-damage incidents as the same definition of incident completion applies regardless of whether the repair of equipment or other intervention is required to restore supplies.

Short interruption (paragraphs 2.27 to 2.32)

One company suggested that for consistency, Ofgem should align the drafting of paragraph 2.3 and 2.27.

Ofgem has made this change

Re-interruption (paragraph 2.33)

Two companies suggested that the definition of re-interruptions should not include short re-interruptions and as such should be defined in terms of further losses of supply to the same customers lasting 3 minutes or longer.

Ofgem has made this change as it improves clarity between the definitions of short interruptions and re-interruptions.

Restoration stage (paragraphs 2.35 to 2.37)

One company suggested that the following re-wording would be more appropriate and avoids the need to define 'customer minutes supplied'.

"Where a customer(s) is temporarily restored for a period of less than three minutes, then calculation of the duration of interruptions to supply should ignore the time for which customers were restored"

Ofgem has made this change

Customers involved in a restoration stage (paragraphs 2.40 to 2.46)

A number of companies argued that the proposed drafting of paragraph 2.42 was inappropriate. The disconnection of one phase of a three-phase HV circuit would not mean that the entire circuit would be disconnected.

Ofgem recognises the concerns expressed by companies and has amended the drafting accordingly to state that if one phase of a three-phase HV circuit is disconnected it should be considered that two-thirds of consumers connected downstream of the point of disconnection had their supplies interrupted.

Interruption sequences (paragraph 2.48)

Most companies suggested that the proposed drafting was inappropriate and suggested alternatives. Companies were concerned that the proposed treatment of interruption sequences introduced the requirement to report short re-interruptions to supply.

It is not appropriate for companies to report short re-interruptions to supply. Ofgem has amended the drafting accordingly.

Disaggregation by voltage levels (paragraphs 2.52 to 2.61)

A number of companies suggested that the original definition of 'LV Services' (paragraph 2.61) should be retained. Many of these noted that the original wording excluded cut-out failures, and that the requirement to report these faults would significantly increase the number of LV service faults recorded.

Ofgem recognises the companies' concerns that the new drafting would require companies to report additional interruptions and has therefore revised the definition of LV services so that cut-out failures are excluded.

Section 3: Definitions, instructions and guidance for reporting on speed and quality of telephone response

Definitions of required information (paragraphs 3.4 to 3.7)

One company suggested that in paragraph 3.5, Ofgem should clarify whether the speed of response should be reported on a calendar or financial month basis.

Ofgem has specified that this should be reported by calendar month.

Another company indicated that there was no difference between “total calls answered” and “relevant phone calls” in paragraph 3.7.

Ofgem has deleted “relevant phone calls”, as this term is unnecessary

Other information required (paragraphs 3.8 to 3.9)

One company suggested that Ofgem should specify the estimated time that customers experience busy lines in the RIGs in paragraph 3.8.

Ofgem has specified 2 seconds as the length of time customers will listen to a busy tone.

The same company also indicated that there appears to be conflict between the second bullet of paragraph 3.9 and the final paragraph of 3.10 (relating to ‘group announcements’) in relation to the recording of calls abandoned.

Where customers hang up:

- ◆ *during the group announcement: or*
- ◆ *once they have receive a message advising them that they are in a queue but before the call is answered; or*
- ◆ *once they have received the message explaining the touch-tone telephone facilities but before they have pressed the appropriate buttons*

their call should be treated as a call abandoned. Paragraphs 3.9 and 3.10 have been redrafted to clarify this.

The same company suggested that the current wording of 3.10 (relating to ‘calls disconnected’) was inappropriate as it did not cover cases where customers are given no opportunity to hold for an agent following a fault message. The company suggested alternative wording to overcome this.

Ofgem has made this change, as it is important to identify cases where customers are not given the opportunity of holding for further information following a fault message.

Section 4: Definitions, instructions and guidance for monitoring medium term performance

Reliability (paragraph 4.5 and 4.6)

One company was concerned that because a fault is defined as an unplanned incident, some events would be reported twice.

The RIGs have been amended to make clear that for the purposes of medium term reporting, an unplanned incident or series of incidents arising from a single direct cause on the same single item of equipment should be treated as one fault.

High voltage (paragraphs 4.9 to 4.12)

A number of companies have argued that the classifications identified in the table in paragraph 4.9 do not match the NaFIRS categories – specifically the categories for ‘Birds and Animals’ and ‘Manufacturer’ are not included. One company asked for clarification as to whether they should follow the guidance in the November 2000 PB Power report. This suggested that ‘Birds and Animals’ should be included in the ‘Environment’ classification and ‘Manufacturer’ included in the ‘Company Causes’ classification.

Ofgem has amended the RIGs to make clear that faults due to ‘Birds and Animals’ could be included in the ‘Environment’ classification. The ‘Company Causes and Manufactures’ classification clearly incorporates faults due to the manufacturer.

Narrative (paragraph 4.18)

One company suggested that in the light of Ofgem’s work on Asset Risk Management, the narrative on medium term performance should concentrate on relevant trend or activity analysis.

Ofgem agrees and has removed the requirement to provide a statement detailing asset management strategies, the requirement to provide details of condition monitoring and post fault investigations and the requirement to provide asset management strategies for 132kV and EHV assets.

Section 5: Required level of accuracy for reporting

Companies did not make any comments with respect to Section 5.

Section 6: Reporting arrangements

No changes have been made to Section 6.

Appendix 1: Purpose of IIP Information

One company suggested that the reference in paragraph 1.1 to the work Ofgem intends to carry out is misleading as some of the work has already been completed.

Ofgem has removed the reference.

The same company assumed that the purpose of this appendix was to satisfy sub paragraphs (a) to (c) of paragraph 3(g) of Standard Licence Condition 49. As such, it suggested that the subheadings in the table should be ‘system performance’, ‘customer satisfaction’ and ‘medium term performance’ respectively.

Ofgem agrees that the sub-headings need amending. To reflect SLC 49, these are now ‘Number and duration of interruptions’, ‘Speed and quality of telephone response’ and ‘Medium term performance’ respectively

Appendix 2: Formulae for the purposes of the scheme

Following the response from Europe Economics on the formulae in the licence modification, Ofgem has adapted the formulae so that the cause of the interruption is clear and time subscripts have also been added to the relevant terms. The formulae have also been simplified by removing disaggregation

by voltage. The definitions of the terms TR and TI have been made consistent with the definitions of NN and ND.

Appendix 3: Other formulae

Following the response from Europe Economics on the formulae in the licence modification, Ofgem has adapted the formulae so that the cause of the interruption is made clear and time subscripts have also be added to the relevant terms