

18<sup>th</sup> March 2014

Our ref: MH/OG/NPG

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Dear James

**Response to: Consultation on NPG's Competition Notice**

GTC operates the BUUK licensed electricity distribution businesses of The Electricity Network Company Limited (ENC) and Independent Power Networks Limited (IPNL). Both of these licensee businesses operate as independent distributors (IDNOs) providing and operating last mile networks which in turn connect to DNO distribution systems. Therefore, we witness on a daily basis the behaviours, systems and processes of all the incumbent distributors across Great Britain in the offering of competition in connections.

Over the last 7 years DNO progress on improving competition in connections progress has been slow. We have met with all of the DNOs on many occasions during that time, setting out the type of behaviours and actions that are required to facilitate a competitive market in connections. We acknowledge that some DNOs have "upped" their game to facilitate arrangements for competition in connections with one or two DNO groups being much more proactive than others. Our experience is that despite the promises and assurances given by DNOs in meetings with us are still to translate into tangible actions. Therefore, we still see significant scope for improvement.

In providing responses to Ofgem consultations on DNO submissions we refer to the presentation delivered to DNOs at Ofgem in July 2011 by the Competitive Networks Association (CNA). This highlighted the actions that DNOs needed to take to facilitate competition in connections. In doing this the CNA compared and contrasted process differences for competition in electricity connections with those in place for gas, which is considered by the majority of operators in the competitive market as best practice borne out of significant pressure by Ofgas and latterly Ofgem. The key differences were illustrated in a check list which is reproduced in Annex 1. At the presentation we indicated that in responding to any competition test we would use this checklist as part of the competition test. As you can see from our assessment NPG still have a number of areas to complete to ensure competition operates effectively.

We think NPG have made significant progress to address many of the issues and we continue to work closely with NPG to complete this work. NPG's submission is something that we would like to support but would like to have assurances that they will address

the remaining areas without undue delay. That being said, we still have concerns about the attitude and culture of parts of the NPG organisation. One such area relates to the auditing regime imposed by some NPG staff and the significantly higher hurdles they apply to work undertaken by ICPs compared to the standards they apply to their own direct labour or subcontractors undertaking similar work. It appears to us that the intent of some individuals is to prevent competition taking hold in their DSAs. If NPG can give guarantees that they can and will control these staff then we are happy to support this application in all of the RSM's that have been submitted and we operate within. We question the need for detailed auditing where work is undertaken by a suitably accredited agents acting as ICPs, but where no auditing or checks are required or undertaken when the same agent acts as a subcontractor to the DNO. Such auditing arrangements impose undue costs on competitors and time delays for customers.

Another area where significant work is still required by all DNOs is the development of systems and processes to enable accredited third parties to undertake their own assessment and design of connections. This is a critical aspect of facilitating the process for competition. We note that DNOs are keen to promote assessment and design charges. Such charges should only be permitted if and when the activity becomes contestable.

Yours sincerely

Mike Harding  
**Head of Regulation**  
**GTC**

## Annex 1

**Table showing NPG's progress against targets**

<b>Process Area</b>	<b>Gas</b>	<b>DNO Market</b>	<b>NPG</b>
<b>ICP in control of meeting delivery to customers throughout connections process</b>	✓	X	Partial
<b>Design process managed by the IGT/IDNO</b>	✓	X	Partial
<b>No onerous application process</b>	✓	X	Partial
<b>Process removes need for onerous inspection regimes</b>	✓	X	X
<b>Self connection process in place</b>	✓	Partial	✓
<b>Behaviour of Upstream Operator doesn't cause loss of work</b>	✓	X	Partial
<b>No additional boundary constraints imposed by upstream operator</b>	✓	Partial	✓
<b>Legal/commercial issues agreed and in place</b>	✓	Partial	✓
<b>Agreed Industry wide arrangements (formal agreements)</b>	✓	Partial	Partial
<b>Emergency Response Agreements in place across the UK</b>	✓	Partial	X

Partial indicates where we have seen significant improvements over the last few years but we are still working with the DNOs' to refine the process.

The onerous inspection regimes is partial as some areas operate this very well whilst some operate draconian procedures designed to frustrate ICPs and drive customers away from using them.

**Table of the RMS’s that are relevant to GTC.**

<b>Market segment</b>	<b>Northern Powergrid (Northeast)</b>	<b>Northern Powergrid (Yorkshire)</b>
1. Metered Demand Low voltage work (LV) – 20 connections and above	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Metered Demand HV and Extra High Voltage (EHV) work	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Metered Demand EHV and above work	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4 Distributed Generation (DG) Low Voltage (LV) work – 20 connections and above	<input type="checkbox"/>	<input type="checkbox"/>
5. Distributed Generation (DG) HV work	<input type="checkbox"/>	<input type="checkbox"/>
6. Distributed Generation (DG) EHV work	<input type="checkbox"/>	<input type="checkbox"/>
7. Unmetered local authority (LA) work	<input type="checkbox"/>	<input type="checkbox"/>
8. Unmetered PFI work	<input type="checkbox"/>	<input type="checkbox"/>
9. Unmetered Other – 5 connections and above	<input type="checkbox"/>	<input type="checkbox"/>

**When answering the questions below, please check the market segments and DSAs that are relevant to your response.**  
**Chapter Two**

Question	Segment (s)	DSA(s)	Response
One: Do you, as a customer or competitor, view these proposed alternatives as distinct segments within the connections market? Are they an appropriate way of segmenting the market for the assessment of effective competition?	LV – 20 and above	<input checked="" type="checkbox"/>	GTC understand the issues around smaller projects. We do find the need to use a link box on projects below 20 properties a barrier to this market as it is not cost reflective of the size of the network. We are talking to a number of DNOs about the need for this equipment as we would be interested in opening up the smaller LV market as well. Therefore this is an appropriate split of this segment.
	Metered HV/EHV	<input checked="" type="checkbox"/>	
	Metered EHV and above	<input checked="" type="checkbox"/>	
	DG LV – 20 and above	<input type="checkbox"/>	
	DG HV	<input type="checkbox"/>	
	DG EHV	<input type="checkbox"/>	
	Unmetered (LA))	<input type="checkbox"/>	
	Unmetered (PFI	<input type="checkbox"/>	
Unmetered (Other) – 5 and above	<input type="checkbox"/>		
Two: Do you consider Northern Powergrid’s definition of each of the proposed alternative market segments to be clear and unambiguous?	LV – 20 and above	<input checked="" type="checkbox"/>	We understand the reasons behind the split.
	Metered HV/EHV	<input checked="" type="checkbox"/>	

Competition in connections – Consultation on Northern Powergrid’s Competition Notices

Question	Segment (s)	DSA(s)	Response
	Metered EHV and above <input checked="" type="checkbox"/>		
	DG LV – 20 and above <input type="checkbox"/>		
	DG HV <input type="checkbox"/>		
	DG EHV <input type="checkbox"/>		
	Unmetered (LA)) <input type="checkbox"/>		
	Unmetered (PFI <input type="checkbox"/>		
	Unmetered (Other) – 5 and above <input type="checkbox"/>		
<p><b>Three:</b> Please provide details of any connection activity which would be difficult to categorise under the proposed alternative market segments.</p>	LV – 20 and above <input checked="" type="checkbox"/>	Northeast <input checked="" type="checkbox"/>	<p>We have considered this categorisation and do not foresee any issues arising from this in terms of connection activity.</p>
Metered HV/EHV <input checked="" type="checkbox"/>	Yorkshire <input checked="" type="checkbox"/>		
Metered EHV and above <input checked="" type="checkbox"/>			
DG LV – 20 and above <input type="checkbox"/>			
DG HV <input type="checkbox"/>			
DG EHV <input type="checkbox"/>			

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Question	Segment (s)	DSA(s)	Response
	Unmetered (LA)) <input type="checkbox"/>		
	Unmetered (PFI) <input type="checkbox"/>		
	Unmetered (Other) – 5 and above <input type="checkbox"/>		
<p><b>Four:</b> Are there other factors that we should take into account in deciding whether to accept or reject Northern Powergrid’s proposed definitions of the alternative market segments?</p>	LV – 20 and above <input checked="" type="checkbox"/>	Northeast <input checked="" type="checkbox"/>	<p>With this split it may be difficult to capture accurately all of the applications at the lower end of the category but believe that this would be a very small amount of projects.</p>
Metered HV/EHV <input checked="" type="checkbox"/>	Yorkshire <input checked="" type="checkbox"/>		
Metered EHV and above <input checked="" type="checkbox"/>			
DG LV – 20 and above <input type="checkbox"/>			
DG HV <input type="checkbox"/>			
DG EHV <input type="checkbox"/>			
Unmetered (LA)) <input type="checkbox"/>			
Unmetered (PFI) <input type="checkbox"/>			
Unmetered (Other) – 5 and above <input type="checkbox"/>			

**Chapter Three**

Question	Segment(s)	DSA(s)	Response
<p><b>One:</b> Are customers aware that competitive alternatives exist?</p>	<p>LV – 20 and above <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV and above <input checked="" type="checkbox"/></p> <p>DG LV – 20 and above <input type="checkbox"/></p> <p>DG HV <input type="checkbox"/></p> <p>DG EHV <input type="checkbox"/></p> <p>Unmetered (LA) <input type="checkbox"/></p> <p>Unmetered (PFI) <input type="checkbox"/></p> <p>Unmetered (Other) – 5 and above <input type="checkbox"/></p>	<p>Northeast <input checked="" type="checkbox"/></p> <p>Yorkshire <input checked="" type="checkbox"/></p>	<p>GTC deal with most developers in the NPG DSA’s and believe that the majority of large customers are aware of the competitive market.</p>
<p><b>Two:</b> Do customers have effective choice, ie are they easily able to seek quotations from competitive alternatives?</p>	<p>LV – 20 and above <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV and <input type="checkbox"/></p>	<p>Northeast <input checked="" type="checkbox"/></p> <p>Yorkshire <input checked="" type="checkbox"/></p>	<p>GTC operate in both DSAs and believe that in both of these areas there is competition.</p>



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Question	Segment(s)	DSA(s)	Response
	above <input checked="" type="checkbox"/> DG LV – 20 and above <input type="checkbox"/> DG HV <input type="checkbox"/> DG EHV <input type="checkbox"/> Unmetered (LA)) <input type="checkbox"/> Unmetered (PFI <input type="checkbox"/> Unmetered (Other) – 5 and above <input type="checkbox"/>		
<b>Three:</b> Does Northern Powergrid take appropriate measures to ensure that customers are aware of the competitive alternatives?	LV – 20 and above <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV and above <input checked="" type="checkbox"/> DG LV – 20 and above <input type="checkbox"/> DG HV <input type="checkbox"/> DG EHV <input type="checkbox"/>	Northeast <input checked="" type="checkbox"/> Yorkshire <input checked="" type="checkbox"/>	NPG have set up a number of seminars for customers which ICPs and IDNOs have attended. They also publicise the competitive market on their website and within their quotations.

Competition in connections – Consultation on Northern Powergrid’s Competition Notices

Question	Segment(s)	DSA(s)	Response
	Unmetered (LA)) <input type="checkbox"/>		
	Unmetered (PFI) <input type="checkbox"/>		
	Unmetered (Other) – 5 and above <input type="checkbox"/>		
<b>Four:</b> Are quotations provided by Northern Powergrid clear and transparent? Do they enable customers to make informed decisions whether to accept or reject a quote?	LV – 20 and above <input checked="" type="checkbox"/>	Northeast <input checked="" type="checkbox"/>	We do not see the quotations sent to customers so cannot comment on whether they are clear and transparent. The quotations received by GTC as an ICP provides sufficient information for us to understand what the costs are and what work is required to connect our IDNO network.
	Metered HV/EHV <input checked="" type="checkbox"/>	Yorkshire <input checked="" type="checkbox"/>	
	Metered EHV and above <input checked="" type="checkbox"/>		
	DG LV – 20 and above <input type="checkbox"/>		
	DG HV <input type="checkbox"/>		
	DG EHV <input type="checkbox"/>		
	Unmetered (LA)) <input type="checkbox"/>		
	Unmetered (PFI) <input type="checkbox"/>		
	Unmetered (Other) – 5 and above <input type="checkbox"/>		
<b>Five:</b> Have customers benefitted from competition?	LV – 20 and above <input checked="" type="checkbox"/>	Northeast <input checked="" type="checkbox"/>	GTC believe that customers have seen improved price within the DSAs.

Competition in connections – Consultation on Northern Powergrid’s Competition Notices

Question	Segment(s)	DSA(s)	Response
Have they seen improvements in Northern Powergrid’s price or service quality or have they been able to source a supplier service or better price from Northern Powergrid’s competitors?	Metered HV/EHV <input checked="" type="checkbox"/>	Yorkshire <input checked="" type="checkbox"/>	We still have concerns about some of the auditing practices carried out by NPG staff that has the effect of increasing the timescale and cost for some of our projects. This appears to be in specific geographic regions rather than across all of their DSAs. GTC understand that this is being addressed by NPG.
	Metered EHV and above <input checked="" type="checkbox"/>		
	DG LV – 20 and above <input type="checkbox"/>		
	DG HV <input type="checkbox"/>		
	DG EHV <input type="checkbox"/>		
	Unmetered (LA)) <input type="checkbox"/>		
	Unmetered (PFI <input type="checkbox"/>		
Unmetered (Other) – 5 and above <input type="checkbox"/>			

**Chapter Four**

Question	Segment(s)	DSA(S)	Response
<b>One:</b> Does the level of competitive activity in the market segment show that there is the potential for further competition to develop?	LV – 20 and above <input checked="" type="checkbox"/>	Northeast <input checked="" type="checkbox"/>	GTC believes that as the economic cycle turns then there will be more activity within the DSAs
	Metered HV/EHV <input checked="" type="checkbox"/>	Yorkshire <input checked="" type="checkbox"/>	
	Metered EHV and above <input checked="" type="checkbox"/>		

Competition in connections – Consultation on Northern Powergrid’s Competition Notices

Question	Segment(s)	DSA(S)	Response
	DG LV – 20 and above <input type="checkbox"/> DG HV <input type="checkbox"/> DG EHV <input type="checkbox"/> Unmetered (LA) <input type="checkbox"/> Unmetered (PFI) <input type="checkbox"/> Unmetered (Other) – 5 and above <input type="checkbox"/>		
<p><b>Two:</b> Consider the organisational structure of Northern Powergrid’s business and its procedures and processes –</p> <p><b>(a)</b> how do they compare to those you encounter elsewhere in the gas and electricity markets or other industries? Do they reflect best practice?</p>	LV – 20 and above <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV and above <input checked="" type="checkbox"/> DG LV – 20 and above <input type="checkbox"/> DG HV <input type="checkbox"/> DG EHV <input type="checkbox"/> Unmetered (LA) <input type="checkbox"/>	Northeast <input checked="" type="checkbox"/> Yorkshire <input checked="" type="checkbox"/>	<p>We still do not see the market as free as the gas market but it is significantly better than when we started in their DSAs five years ago. Some of their procedures are best practice at the present time but we believe that there is still work to do. In particular some parts of NPG still rely on paper based systems and posting documents rather than utilising emails. GTC have spoken to NPG about these issues and NPG advise that it is in their plan to improve the use of IT to</p>

Competition in connections – Consultation on Northern Powergrid’s Competition Notices

Question	Segment(s)	DSA(S)	Response
<p><b>(b)</b> do they enable competitors to compete with the timescales for connection (from quote to energisation) offered by Northern Powergrid? Or do they offer Northern Powergrid any inherent advantage over its competitors or prevent existing competitors from competing with them effectively?</p> <p><b>(c)</b> do they assist, obstruct or delay connections providers entering the market segment?</p>	<p>Unmetered (PFI) <input type="checkbox"/></p> <p>Unmetered (Other) – 5 and above <input type="checkbox"/></p>		<p>eliminate these potential delays.</p> <p>It is still not possible to compete to the same timescale as NPG. It has significantly improved and the advent of self-connect and self-assessment of points of connection are assisting in this. Like all aspects of the connection work it is far better for the ICP/IDNO to be in full control of the process. The legal process works like this now and has significantly improved the customer service GTC can offer by allowing us to be in control of the timescale.</p> <p>We will continue to work with NPG to improve the timescale as NPG have committed to us that we will be able to connect in the same timescale as the gas market.</p> <p>The one areas that we see any delays is as mentioned before, in certain geographic areas where individuals treat us differently to their own projects. NPG are aware of this and we believe are working on changing hearts and minds within these DSAs.</p>
<p><b>Three:</b> Are the non-contestable charges levied by Northern Powergrid for statutory connections consistent with those levied for competitive quotations? Are they easily comparable with competitive quotations?</p>	<p>LV – 20 and above <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV and above <input checked="" type="checkbox"/></p>	<p>Northeast <input checked="" type="checkbox"/></p> <p>Yorkshire <input checked="" type="checkbox"/></p>	<p>We do not see the charges levied by NPG as a barrier to competition.</p>

Competition in connections – Consultation on Northern Powergrid’s Competition Notices

Question	Segment(s)	DSA(S)	Response
Do the differences in charges between a POC quote and the non-contestable elements of a full works quote act as a barrier to competition?	DG LV – 20 and above <input type="checkbox"/> DG HV <input type="checkbox"/> DG EHV <input type="checkbox"/> Unmetered (LA) <input type="checkbox"/> Unmetered (PFI) <input type="checkbox"/> Unmetered (Other) – 5 and above <input type="checkbox"/>		
<p><b>Four:</b> What factors are key influences on development of competition in the RMSs? In particular, if you are an existing/potential competitor:</p> <p><b>(a)</b> what is the potential for you to enter new RMSs, or grow your share of a market segment in which they already operate in?</p> <p><b>(b)</b> are there are any types of connection in any of the market segments, or geographic locations in Northern Powergrid’s</p>	LV – 20 and above <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV and above <input checked="" type="checkbox"/> DG LV – 20 and above <input type="checkbox"/> DG HV <input type="checkbox"/> DG EHV <input type="checkbox"/> Unmetered (LA) <input type="checkbox"/>	Northeast <input checked="" type="checkbox"/> Yorkshire <input checked="" type="checkbox"/>	<p>The biggest factor to opening up the market for us is to gain more control of the process. This is beginning to happen thanks to the work put in by NPG and other ICPs. GTC believe that the progress over the last few years has been significant.</p> <p>We do not see any types of connections in the RMS as being unattractive to GTC. As mentioned before the remaining LV RSM of up to 20 plots is less attractive due to the expense of the LV link box.</p>

Competition in connections – Consultation on Northern Powergrid’s Competition Notices

Question	Segment(s)	DSA(S)	Response
DSAs, that by their nature, are not attractive to competition? Please explain your response.	Unmetered (PFI) <input type="checkbox"/>		
	Unmetered (Other) – 5 and above <input type="checkbox"/>		

**Chapter Five**

Question	Segments(s)	DSA(S)	Response
<b>One:</b> Do you agree with the methods used by Northern Powergrid to analyse the level of competition in each of the RMSs or alternative market segments covered by its application? In particular, do you consider that Northern Powergrid gives a clear indication of the current level of competitive activity in each market segment?	LV – 20 and above <input checked="" type="checkbox"/>	Northeast <input checked="" type="checkbox"/>	We understand the way that NPG have demonstrated activity in the RSMs and believe that this is a reasonable view of activity within their DSAs.
	Metered HV/EHV <input checked="" type="checkbox"/>	Yorkshire <input checked="" type="checkbox"/>	
	Metered EHV and above <input checked="" type="checkbox"/>		
	DG LV – 20 and above <input type="checkbox"/>		
	DG HV <input type="checkbox"/>		
	DG EHV <input type="checkbox"/>		
	Unmetered (LA) <input type="checkbox"/>		
	Unmetered (PFI) <input type="checkbox"/>		

Competition in connections – Consultation on Northern Powergrid’s Competition Notices

	Unmetered (Other) – 5 and above <input type="checkbox"/>		
<b>Two:</b> In each market segment, do you consider that competitive activity is at a level that in itself indicates that effective competition exists? In each segment, do you consider that the coverage of existing competitive activity extends across the segment?	LV – 20 and above <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV and above <input checked="" type="checkbox"/> DG LV – 20 and above <input type="checkbox"/> DG HV <input type="checkbox"/> DG EHV <input type="checkbox"/>	Northeast <input checked="" type="checkbox"/> Yorkshire <input checked="" type="checkbox"/>	Whilst we believe that there is a high level of activity we are still concerned at the ability of NPG to alter our connection dates through their activity. Whilst this occurs in a small part of their DSAs it can affect customer’s perception of competition and has led to a loss of opportunities as customers have been concerned that their connection dates will not be met.



Competition in connections – Consultation on Northern Powergrid’s Competition Notices

	Unmetered (LA)) <input type="checkbox"/>		
	Unmetered (PFI) <input type="checkbox"/>		
	Unmetered (Other) – 5 and above <input type="checkbox"/>		

**Chapter Seven**

Question	Segment(s)	DSA(S)	Response
<b>One:</b> Do you consider customers have an effective choice of connections provider? In particular, do you feel that levels of choice, value and service will be protected and will improve if the restriction on Northern Powergrid’s ability to earn a margin is removed?	LV – 20 and above <input checked="" type="checkbox"/>	Northeast <input checked="" type="checkbox"/>	Subject to NPG following through with their commitments to allow greater control of project timescales then customers will be protected by choice and the ability to deliver by all market entrants.
	Metered HV/EHV <input checked="" type="checkbox"/>	Yorkshire <input checked="" type="checkbox"/>	
	Metered EHV and above <input checked="" type="checkbox"/>		
	DG LV – 20 and above <input type="checkbox"/>		
	DG HV <input type="checkbox"/>		
	DG EHV <input type="checkbox"/>		
	Unmetered (LA)) <input type="checkbox"/>		
	Unmetered (PFI) <input type="checkbox"/>		
Unmetered (Other) – 5 and <input type="checkbox"/>			

Competition in connections – Consultation on Northern Powergrid’s Competition Notices

	above			
<b>Two:</b> Do you consider that there is scope for competitors to grow their market share (for example, if Northern Powergrid put up its prices or if its quality dropped), or are there factors constraining this?	LV – 20 and above	<input checked="" type="checkbox"/>	Northeast	<input checked="" type="checkbox"/>
	Metered HV/EHV	<input checked="" type="checkbox"/>	Yorkshire	<input checked="" type="checkbox"/>
	Metered EHV and above	<input checked="" type="checkbox"/>		
	DG LV – 20 and above	<input type="checkbox"/>		
	DG HV	<input type="checkbox"/>		
	DG EHV	<input type="checkbox"/>		
	Unmetered (LA))	<input type="checkbox"/>		
	Unmetered (PFI	<input type="checkbox"/>		
Unmetered (Other) – 5 and above	<input type="checkbox"/>			We believe that there is scope to grow market share as long as market entrants can deliver without being impinged by the activity of NPG.
<b>Three:</b> Do you consider that there is scope and/or appetite for new participants to enter the market? Do you consider that new entrants would be able to provide similar or better services than existing participants or are there factors constraining	LV – 20 and above	<input checked="" type="checkbox"/>	Northeast	<input checked="" type="checkbox"/>
	Metered HV/EHV	<input checked="" type="checkbox"/>	Yorkshire	<input checked="" type="checkbox"/>
	Metered EHV and above	<input checked="" type="checkbox"/>		
	DG LV – 20 and			
				We believe that there is scope for new entrants to enter the RSMs.

Competition in connections – Consultation on Northern Powergrid’s Competition Notices

this?	above <input type="checkbox"/> DG HV <input type="checkbox"/> DG EHV <input type="checkbox"/> Unmetered (LA)) <input type="checkbox"/> Unmetered (PFI <input type="checkbox"/> Unmetered (Other) – 5 and above <input type="checkbox"/>		
<b>Four:</b> Given your overall view of Northern Powergrid, do you consider that we can have confidence in them to operate appropriately in the event that price regulation is lifted?	LV – 20 and above <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV and above <input checked="" type="checkbox"/> DG LV – 20 and above <input type="checkbox"/> DG HV <input type="checkbox"/> DG EHV <input type="checkbox"/> Unmetered (LA)) <input type="checkbox"/> Unmetered (PFI <input type="checkbox"/>	Northeast <input checked="" type="checkbox"/> Yorkshire <input checked="" type="checkbox"/>	The vast majority of the NPG area is open for competition. So as long as NPG can control some of their staff effectively then we have confidence in them acting appropriately.

Competition in connections – Consultation on Northern Powergrid’s Competition Notices

	Unmetered (Other) – 5 and above <input type="checkbox"/>		
<b>Five:</b> Do you consider that there are factors not addressed in this consultation that should be taken into consideration in determining whether price regulation should be lifted?	LV – 20 and above <input checked="" type="checkbox"/>	Northeast <input checked="" type="checkbox"/>	We believe that all of the relevant factors have been considered.
	Metered HV/EHV <input checked="" type="checkbox"/>	Yorkshire <input checked="" type="checkbox"/>	
	Metered EHV and above <input checked="" type="checkbox"/>		
	DG LV – 20 and above <input type="checkbox"/>		
	DG HV <input type="checkbox"/>		
	DG EHV <input type="checkbox"/>		
	Unmetered (LA) <input type="checkbox"/>		
	Unmetered (PFI) <input type="checkbox"/>		
	Unmetered (Other) – 5 and above <input type="checkbox"/>		