

Each of the questions asked by this consultation is set out in the template below. **Note that an editable version of this response template is available on our website as an associated document to this consultation.** If you do not wish to use our response template, please ensure that you indicate the RMS and DSA to which your experiences relate.

When considering your responses to these questions, please consider your experiences, the actions that SSEPD has undertaken and the actions that you consider it could reasonably undertake.

**Please check the RMS and DSAs that are relevant to you in the table below.**

RMS	SEPD	SHEPD
1. Metered high voltage work (HV)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Metered HV and Extra High Voltage (EHV) work	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Metered EHV and above work	<input type="checkbox"/>	<input type="checkbox"/>
4. Distributed Generation (DG) HV and EHV voltage	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5. Unmetered local authority (LA) work	<input type="checkbox"/>	
6. Unmetered PFI work	<input type="checkbox"/>	
7. Unmetered Other	<input type="checkbox"/>	

**When answering the questions below, please check the RMS(s) and DSA(s) that are relevant to your response.**

## **Chapter Two**

Question	RMS(s)	DSA(s)	Response
<b>One:</b> Are customers aware that competitive alternatives exist?	Metered HV	<input checked="" type="checkbox"/>	From our perspective we believe that SSE have been very proactive in making customers aware of competitive connection alternative arrangements but note that it may be difficult to arrange for competition to thrive in some areas and particularly when considering connection alternative arrangements whereby HV O/H connections are required .
	Metered HV/EHV	<input type="checkbox"/>	
	Metered EHV & above	<input type="checkbox"/>	
	DG HV/EHV	<input checked="" type="checkbox"/>	
	Unmetered (LA)	<input type="checkbox"/>	
	Unmetered PFI	<input type="checkbox"/>	

Question	RMS(s)	DSA(s)	Response
	Unmetered (Other) <input type="checkbox"/>		
<b>Two:</b> Do customers have effective choice (ie are customers easily able to seek alternative quotations)? from competitive alternatives?	Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input type="checkbox"/> Metered EHV & above <input type="checkbox"/> DG HV/EHV <input checked="" type="checkbox"/> Unmetered (LA) <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered (Other) <input type="checkbox"/>	SEPD <input checked="" type="checkbox"/> SHEPD <input type="checkbox"/>	<p style="text-align: center;">Yes but see comments above</p>
<b>Three:</b> Does SSEPD take appropriate measures to ensure that customers are aware of the competitive alternatives available to them?	Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input type="checkbox"/> DG HV/EHV <input checked="" type="checkbox"/> Unmetered (LA) <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered (Other) <input type="checkbox"/>	SEPD <input checked="" type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	<p>From our own perspective we have no concern that SSE does ensure that customer have the option and facility to engage fully with regard to alternative arrangements for competitive connections. There remain concerns relating to some technical considerations but would confirm that SSE are fully engaged with customers and ICP's through the DG Technical Workshops etc to resolve outstanding issues.</p>

Question	RMS(s)	DSA(s)	Response
<p><b>Four:</b> Are quotations provided by SSEPD clear and transparent? Do they enable customers to make informed decisions of whether to accept or reject a quote?</p>	<p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV &amp; above <input type="checkbox"/></p> <p>DG HV/EHV <input checked="" type="checkbox"/></p> <p>Unmetered (LA) <input type="checkbox"/></p> <p>Unmetered PFI <input type="checkbox"/></p> <p>Unmetered (Other) <input type="checkbox"/></p>	<p>SEPD <input checked="" type="checkbox"/></p> <p>SHEPD <input checked="" type="checkbox"/></p>	<p>We now have few problems with the quality and constancy of the quotations provided. Likewise we have not encountered any problems when we have subsequently reverted to SSE with requests for assistance or further information.</p>
<p><b>Five:</b> Have customers benefitted from competition? Have they seen improvements in SSEPD's price or service quality, or have they been able to source a superior service or better price from SSEPD's competitors?</p>	<p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV &amp; above <input type="checkbox"/></p> <p>DG HV/EHV <input checked="" type="checkbox"/></p> <p>Unmetered (LA) <input type="checkbox"/></p> <p>Unmetered PFI <input type="checkbox"/></p> <p>Unmetered (Other) <input type="checkbox"/></p>	<p>SEPD <input checked="" type="checkbox"/></p> <p>SHEPD <input checked="" type="checkbox"/></p>	<p>We believe that the service from SSE has definitely improved over the last 24 months. Note however that it may be difficult in some areas gaining a quotation from suitably accredited ICP's for, say, overhead line work.</p>

Question	RMS(s)	DSA(s)	Response
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### Chapter Three

Question	RMS(S)	DSA(S)	Response
<p><b>One:</b> Does the level of competitive activity in the RMSs show that there is the potential for further competition to develop?</p>	<p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV &amp; above <input type="checkbox"/></p> <p>DG HV/EHV <input checked="" type="checkbox"/></p> <p>Unmetered (LA) <input type="checkbox"/></p> <p>Unmetered PFI <input type="checkbox"/></p> <p>Unmetered (Other) <input type="checkbox"/></p>	<p>SEPD <input type="checkbox"/></p> <p>SHEPD <input checked="" type="checkbox"/></p>	<p>Whilst there is considered to be scope for competition to develop it should be noted that there may be little appetite for ICP's to consider work in any RMS where overhead line work is a major constituent of any actual connection. (Is this type of work too specialised and inconsistent?).</p> <p>One further consideration relating to the above is that potentially cheaper O/H connections may, by necessity, require a more expensive U/G connection if the work is to be undertaken / performed by an ICP.</p>
<p><b>Two:</b> Consider the organisational structure of SSEPD'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> <p><b>(b)</b> do they enable competitors to compete</p>	<p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV &amp; above <input type="checkbox"/></p> <p>DG HV/EHV <input checked="" type="checkbox"/></p> <p>Unmetered (LA) <input type="checkbox"/></p> <p>Unmetered PFI <input type="checkbox"/></p> <p>Unmetered (Other) <input type="checkbox"/></p>	<p>SEPD <input checked="" type="checkbox"/></p> <p>SHEPD <input checked="" type="checkbox"/></p>	<p>We have encountered few problems with SSE in general.</p>

Question	RMS(S)	DSA(S)	Response
<p>with the timescales for connection (from quote to energisation) offered by SSEPD? Or do they offer SSEPD 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 RMSs?</p>			<p>'Time to connect' remains an issue throughout the industry and SSE is no better or worse than any of the other DNO's in managing the overall process. This comment relates to both competitive and statutory connections</p> <p>See above.</p>
<p><b>Three:</b> Are the non-contestable charges levied by SSEPD for statutory connections in the RMSs consistent with those levied for competitive quotations? Are they easily comparable with competitive quotations? Do the differences in charges between a point of connection (POC) quote and the non-contestable elements of an all works quote act as a barrier to competition?</p>	<p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV &amp; above <input type="checkbox"/></p> <p>DG HV/EHV <input checked="" type="checkbox"/></p> <p>Unmetered (LA) <input type="checkbox"/></p> <p>Unmetered PFI <input type="checkbox"/></p> <p>Unmetered (Other) <input type="checkbox"/></p>	<p>SEPD <input checked="" type="checkbox"/></p> <p>SHEPD <input checked="" type="checkbox"/></p>	<p>We do have some concerned with regard to non-contestable charges within the SSEPD area (in general) and will be reviewing this element. However there is not considered to be a discrepancy between competitive and statutory connections quotations such that this would be a barrier to competition.</p>

Question	RMS(S)	DSA(S)	Response
<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 competitors to enter each RMSs, or grow their share of an the RMS if they already operate in it?</p> <p><b>(b)</b> are there are any types of connection in any of the RMSs, or geographic locations in SSEPD's DSAs, that by their nature, are not attractive to competition? Please explain your response.</p>	Metered HV	<input checked="" type="checkbox"/> SEPD <input checked="" type="checkbox"/>	N/A
	Metered HV/EHV	<input checked="" type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	
	Metered EHV & above	<input type="checkbox"/>	N/A
	DG HV/EHV	<input checked="" type="checkbox"/>	
	Unmetered (LA)	<input type="checkbox"/>	
	Unmetered PFI	<input type="checkbox"/>	
Unmetered (Other)	<input type="checkbox"/>	N/A. But please see note above regarding overhead line work	

#### **Chapter Four**

Question	RMS(S)	DSA(S)	Response
<p><b>One:</b> Do you agree with the methods used by SSEPD to analyse the level of competition in each of the RMSs covered by its application? In particular, do you consider that SSEPD the data provided gives a clear indication of the current level of competitive activity in each RMS?</p>	Metered HV	<input checked="" type="checkbox"/> SEPD <input checked="" type="checkbox"/>	We must assume that the information provided was supplied against a common template?
	Metered HV/EHV	<input checked="" type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	
	Metered EHV & above	<input type="checkbox"/>	
	DG HV/EHV	<input checked="" type="checkbox"/>	
	Unmetered (LA)	<input type="checkbox"/>	
	Unmetered PFI	<input type="checkbox"/>	

	Unmetered (Other) <input type="checkbox"/>		
<b>Two:</b> Do you consider that competitive activity is at a level that in itself indicates that effective competition exists? Do you consider that the coverage of existing competitive activity extends across each RMS?	Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input type="checkbox"/> DG HV/EHV <input checked="" type="checkbox"/> Unmetered (LA) <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered (Other) <input type="checkbox"/>	SEPD <input checked="" type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	No comment

### **Chapter Six**

<b>Question</b>	<b>RMS(S)</b>	<b>DSA(S)</b>	<b>Response</b>
<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 SSEPD's ability to earn a margin is removed?	Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input type="checkbox"/> DG HV/EHV <input checked="" type="checkbox"/> Unmetered (LA) <input type="checkbox"/>	SEPD <input checked="" type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	Our concern (from a customers perspective) relates to the fact that any DNO could be allowed to put up prices where competition (for what ever reason) will not flourish ? What protection will then be available to customers ?

Question	RMS(S)	DSA(S)	Response
	Unmetered PFI <input type="checkbox"/> Unmetered (Other) <input type="checkbox"/>		
<b>Two:</b> Do you consider that there is scope for competitors to grow their market share (for example, if SSEPD put up its prices or if its quality dropped), or are there factors constraining this?	Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input type="checkbox"/> DG HV/EHV <input checked="" type="checkbox"/> Unmetered (LA) <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered (Other) <input type="checkbox"/>	SEPD <input checked="" type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	See above.
<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 this?	Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input type="checkbox"/> DG HV/EHV <input checked="" type="checkbox"/> Unmetered (LA) <input type="checkbox"/> Unmetered PFI <input type="checkbox"/>	SEPD <input checked="" type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	Please see response above.

Question	RMS(S)	DSA(S)	Response
	Unmetered (Other) <input type="checkbox"/>		
<p><b>Four:</b> Given your overall view of SSEPD, do you consider that we can have confidence in them to operate appropriately in the event that price regulation is lifted?</p>	Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input type="checkbox"/> DG HV/EHV <input checked="" type="checkbox"/> Unmetered (LA) <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered (Other) <input type="checkbox"/>	SEPD <input checked="" type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	<p>In general we believe that SSE has made excellent improvements in their business strategy towards customer consultation/customer's requirements and competitive connections. However we still have reservations (as with all of the DNO's) to situations whereby price regulation may be lifted but no competition exists or is likely to exist for the immediate future.</p>
<p><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?</p>	Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input type="checkbox"/> DG HV/EHV <input checked="" type="checkbox"/> Unmetered (LA) <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered (Other) <input type="checkbox"/>	SEPD <input checked="" type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	<p>See above . No further comment</p>

Question	RMS(S)	DSA(S)	Response