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)	☒	☐
2. Metered HV and Extra High Voltage (EHV) work	☐	☐
3. Metered EHV and above work	☐	☐
4. Distributed Generation (DG) HV and EHV voltage	☒	☐
5. Unmetered local authority (LA) work	☐	
6. Unmetered PFI work	☐	
7. Unmetered Other	☐	

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
One: Are customers aware that competitive alternatives exist?	Metered HV ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐ Unmetered PFI ☐	SEPD ☒ SHEPD ☐	Yes, we are aware for contestable work.

Question	RMS(s)		DSA(s)		Response
	Unmetered (Other)	☐			
Two: Do customers have effective choice (ie are customers easily able to seek alternative quotations)? from competitive alternatives?	Metered HV Metered HV/EHV Metered EHV & above DG HV/EHV Unmetered (LA) Unmetered PFI Unmetered (Other)	☒ ☐ ☐ ☒ ☐ ☐ ☐	SEPD SHEPD	☒ ☐	Yes, there are companies such as Freedom Group prepared to offer competitive connections for 11kV metered demand side and export connections.
Three: Does SSEPD take appropriate measures to ensure that customers are aware of the competitive alternatives available to them?	Metered HV Metered HV/EHV Metered EHV & above DG HV/EHV Unmetered (LA) Unmetered PFI Unmetered (Other)	☒ ☐ ☐ ☒ ☐ ☐ ☐	SEPD SHEPD	☒ ☐	Quotations state that there are alterative service providers.

Question	RMS(s)	DSA(s)	Response
Four: Are quotations provided by SSEPD clear and transparent? Do they enable customers to make informed decisions of whether to accept or reject a quote?	Metered HV ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐ Unmetered PFI ☐ Unmetered (Other) ☐	SEPD ☒ SHEPD ☐	I think this is an area for potential improvement. Costs are not sufficiently broken down to show sizes of transformers and cables etc. and the costs are not attributed at component level.
Five: 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?	Metered HV ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐ Unmetered PFI ☐ Unmetered (Other) ☐	SEPD ☒ SHEPD ☐	I can only comment on the last 18 months that I have been employed by a customer of SSE PD. I have seen willingness and enthusiasm within SSEPD staff to offer a good service to connections customers, although there are a few isolated small numbers of staff with old attitudes.

Question	RMS(s)	DSA(s)	Response

Chapter Three

Question	RMS(S)	DSA(S)	Response
One: Does the level of competitive activity in the RMSs show that there is the potential for further competition to develop?	Metered HV ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐ Unmetered PFI ☐ Unmetered (Other) ☐	SEPD ☒ SHEPD ☐	No – there are at least three ICPs operating in this field and DNO area that I know of, and the amount of business is of limited size. If too many ICPs operate then they will be limited by their available scale of operations.
Two: Consider the organisational structure of SSEPD's business and its procedures and processes – **(a)** how do they compare to those you encounter elsewhere in the gas and electricity markets or other industries? Do they reflect best practice? **(b)** do they enable competitors to compete	Metered HV ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐ Unmetered PFI ☐ Unmetered (Other) ☐	SEPD ☒ SHEPD ☐	a) I think that Western Power Distribution has a better organisational structure in that they have regional managers with a very flat structure and locally empowered HV planning engineers who interface with customers and take total ownership of connections projects with the same planning engineers dealing with demand as well as DG connections and also finding POCs as well as the connections quotation. b) DNOs have an advantage over their competitors through their G81 lists of approved materials, which includes consumables such as cables and joint kits. For

Question	RMS(S)	DSA(S)	Response
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? **(c)** do they assist, obstruct or delay connections providers entering the RMSs?			instance a Sicame Joint is acceptable to UK Power Networks but not to SSE PD who insists on Tyco joints. This puts ICPs at a disadvantage for no apparent reason. Why not have one national G81 list held by the ENA? c) Since I do not represent a ICP or iDNO, I cannot comment on this.
Three: 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?	Metered HV ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐ Unmetered PFI ☐ Unmetered (Other) ☐	SEPD ☒ SHEPD ☐	I find there are not easy to compare since: a) The non-contestable work is often for different types of work than the contestable work (e.g. the former is mainly “closing” joints and upgrading existing overhead lines, whilst the latter is mainly cable laying and non-shutdown related jointing. b) There is insufficient breakdown and transparency in quotations to allow this comparison to be made since costs per joint or metre of cable are not shown.

Question	RMS(S)		DSA(S)		Response
Four: What factors are key influences on development of competition in the RMSs? In particular, if you are an existing/potential competitor **(a)** what is the potential for competitors to enter each RMSs, or grow their share of an the RMS if they already operate in it? **(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.	Metered HV Metered HV/EHV Metered EHV & above DG HV/EHV Unmetered (LA) Unmetered PFI Unmetered (Other)	☒ ☐ ☐ ☒ ☐ ☐ ☐	SEPD SHEPD	☒ ☐	I am not an ICP or iDNO so cannot comment, although I have found at least one ICP willing to operate in SEPD area.

Chapter Four

Question	RMS(S)		DSA(S)		Response
One: 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?	Metered HV Metered HV/EHV Metered EHV & above DG HV/EHV Unmetered (LA) Unmetered PFI	☒ ☐ ☐ ☒ ☐ ☐	SEPD SHEPD	☒ ☐	I am not aware of what methods are used.

	Unmetered (Other) ☐		
Two: 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 ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐ Unmetered PFI ☐ Unmetered (Other) ☐	SEPD ☐ SHEPD ☐	Yes, I think that competition is sufficiently apparent and sustainable.

Chapter Six

Question	RMS(S)	DSA(S)	Response
One: 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 ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐	SEPD ☒ SHEPD ☐	I think that additional safeguards are required such a mechanism for large customers to make complaints to Ofgem without having to go through an expensive and time consuming determination process.

Question	RMS(S)	DSA(S)	Response
	Unmetered PFI ☐ Unmetered (Other) ☐		
Two: 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 ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐ Unmetered PFI ☐ Unmetered (Other) ☐	SEPD ☒ SHEPD ☐	There are constraining factors such as with major construction projects, time is of the essence. Therefore the host DNO has existing relationships with landowners which can provide a time advantage in obtaining wayleaves. Although any ICP we might use would have NERS accreditation, there is always the risk of refusal to adopt by the host DNO that could introduce an additional risk plus the added complexity of dealing with two parties over the contestable and non-contestable work.
Three: 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 ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐ Unmetered PFI ☐	SEPD ☒ SHEPD ☐	I have previously stated that having different G81 lists between DNOs could be seen as an unnecessary constraining factor.

Question	RMS(S)	DSA(S)	Response
	Unmetered (Other) ☐		
Four: 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?	Metered HV ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐ Unmetered PFI ☐ Unmetered (Other) ☐	SEPD ☒ SHEPD ☐	No. Since personalities and management strategies and cultures can change, there should be a fast track and simple mechanism for major customers to complain to Ofgem or other regulatory body.
Five: 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?	Metered HV ☒ Metered HV/EHV ☐ Metered EHV & above ☐ DG HV/EHV ☒ Unmetered (LA) ☐ Unmetered PFI ☐ Unmetered (Other) ☐	SEPD ☒ SHEPD ☐	No.

Question	RMS(S)	DSA(S)	Response