

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 type="checkbox"/>	<input type="checkbox"/>
2. Metered HV and Extra High Voltage (EHV) work	<input type="checkbox"/>	<input type="checkbox"/>
3. Metered EHV and above work	<input type="checkbox"/>	<input type="checkbox"/>
4. Distributed Generation (DG) HV and EHV voltage	<input 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
One: Are customers aware that competitive alternatives exist?	Metered HV <input type="checkbox"/>	SEPD <input type="checkbox"/>	Yes
	Metered HV/EHV <input type="checkbox"/>	SHEPD ✓	
	Metered EHV & above <input type="checkbox"/>		
	DG HV/EHV ✓		
	Unmetered (LA) <input type="checkbox"/>		
	Unmetered PFI <input type="checkbox"/>		

Question	RMS(s)	DSA(s)	Response
	Unmetered (Other) <input type="checkbox"/>		
Two: Do customers have effective choice (ie are customers easily able to seek alternative quotations)? from competitive alternatives?	Metered HV <input 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 type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	<p>Customers have choice, however, the NERS accreditation system significantly limits the number of contractors who are able to quote for contestable works. In most cases the cost saving is not considered significant enough due to the extra effort required to manage the interface between the two parties.</p>
Three: Does SSEPD take appropriate measures to ensure that customers are aware of the competitive alternatives available to them?	Metered HV <input 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 type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	<p>SHEPD does inform that contractors can undertake the Contestable works, but do not appear to make the process easy</p>

Question	RMS(s)	DSA(s)	Response
<p>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?</p>	<p>Metered HV <input type="checkbox"/></p> <p>Metered HV/EHV <input type="checkbox"/></p> <p>Metered EHV & 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>Quotations for connections are anything but transparent, comparisons between similar connections with apparently similar scope of works can be significantly different. There appears to be no fixed pricing methodology and no means of ascertaining a firm and fixed price for the connection works</p>
<p>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?</p>	<p>Metered HV <input type="checkbox"/></p> <p>Metered HV/EHV <input type="checkbox"/></p> <p>Metered EHV & 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>We have seen no benefit from completion in terms of cost or service. We currently have a significant connection program ahead of us and have major concerns that SHEPD will not be able to deliver the connections to the dates suggested in their connection offers. Even if we use NERS contractors to undertake the Contestable sections of the works we still feel the SHEPD are under resourced to deliver the renewable connections program which currently exists. It also appears that the process is kept deliberately opaque so SHEPD can always blame others for delays in connections</p>

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

Question	RMS(S)	DSA(S)	Response
<p>One: Does the level of competitive activity in the RMSs show that there is the potential for further competition to develop?</p>	Metered HV <input type="checkbox"/>	SEPD <input type="checkbox"/>	<p>Undoubtedly more competition is required but SHEPD still need to make the interface between them and the alternative contractors more transparent. It is possible that the alternative contractors are costly because the interfaces are currently too complicated and thus the contractors have to price in very large amounts of management time which all adds to the cost of connection.</p>
	Metered HV/EHV <input 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"/>			
<p>Two: Consider the organisational structure of SSEPD's business and its procedures and processes –</p> <p>(a) 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) do they enable competitors to compete</p>	Metered HV <input type="checkbox"/>	SEPD <input type="checkbox"/>	<p>SHEPD still have the "Nationalised business mentality" and are lacking in customer focus</p> <p>They do not make it easy for competitors to compete, technical information is generally vague</p>
	Metered HV/EHV <input 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"/>			

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>(c) do they assist, obstruct or delay connections providers entering the RMSs?</p>			<p>and detail on interfaces in poor</p> <p>They certainly do not assist</p>
<p>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?</p>	<p>Metered HV <input type="checkbox"/></p> <p>Metered HV/EHV <input type="checkbox"/></p> <p>Metered EHV & 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>We have no way of checking whether the non contestable works are competitive, as state above they are completely un accountable and it always appears that we are paying for significant amounts of management overhead.</p>

Question	RMS(S)	DSA(S)	Response
<p>Four: What factors are key influences on development of competition in the RMSs? In particular, if you are an existing/potential competitor</p> <p>(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?</p> <p>(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 type="checkbox"/> SEPD <input type="checkbox"/>	<p>For more competitors to enter the market there needs to be more transparent technical information and interfaces between SHEPD and other providers need to be simplified.</p>
	Metered HV/EHV	<input 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"/>		

Chapter Four

Question	RMS(S)	DSA(S)	Response
<p>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?</p>	Metered HV	<input type="checkbox"/> SEPD <input type="checkbox"/>	<p>I have not seen any analyse of competition by SSEPD</p>
	Metered HV/EHV	<input 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"/>		
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 <input 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 type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	No

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 <input 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"/>	SEPD <input type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	No, customers do not have an effective choice of connection provider. The current margin earned by SHEPD on connections appears to be very large based on the costs to install similar equipment elsewhere in the industrial environment, however it would appear that significant other additional costs are added to make the margins look reasonable.

Question	RMS(S)	DSA(S)	Response
	Unmetered PFI <input type="checkbox"/> Unmetered (Other) <input type="checkbox"/>		
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 <input 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 type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	Significant scope for competitor growth but this will require better interface and a desire for it to happen within SSE
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 <input 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"/>	SEPD <input type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	Yes, new participants can enter the market but we will always be in the hands of SSEPD to get the final connection, if they don't have sufficient operational staff connections will still be delayed and with delay comes additional cost from the external contractor

Question	RMS(S)	DSA(S)	Response
	Unmetered (Other) <input type="checkbox"/>		
<p>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?</p>	Metered HV <input 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 type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	<p>I do not have confidence in their current pricing structure so less regulation will further reduce confidence</p>
<p>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?</p>	Metered HV <input type="checkbox"/> Metered HV/EHV <input type="checkbox"/> Metered EHV & above <input checked="" type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered (LA) <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered (Other) <input type="checkbox"/>	SEPD <input type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	<p>Transparency in pricing is required, not just on the equipment side but on management costs and margin applied to all categories of cost head.</p>

Question	RMS(S)	DSA(S)	Response