

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 checked="" type="checkbox"/>	<input checked="" 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
One: Are customers aware that competitive alternatives exist?	Metered HV <input checked="" type="checkbox"/>	SEPD <input checked="" type="checkbox"/>	This varies with different customer types but we believe in the main that there is more and more awareness of the competitive market.
	Metered HV/EHV <input checked="" type="checkbox"/>	SHEPD <input checked="" type="checkbox"/>	
	Metered EHV & above <input checked="" 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"/>		
Two: 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 checked="" type="checkbox"/> Metered EHV & above 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"/>	Yes, customers do have choice from alternatives albeit in our experience these routes certainly do not guarantee to save customers money.
Three: 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 DG HV/EHV <input checked="" type="checkbox"/> Unmetered (LA) <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered <input type="checkbox"/>	SEPD <input checked="" type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	We would comment that within their quotations and other public information such as web site that SSEPD does undertake measures to promote / advertise the availability of competition. We believe that this is not to the same extent as other best in practice examples.

Question	RMS(s)	DSA(s)	Response
	(Other)		
<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 checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV & above <input checked="" 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>Like most industry quotations they are not necessarily the easiest things to understand for customers unfamiliar with Electricity Connections. We would comment however that this is a general comment which is equally true with Licenced or SLC15 quotes. Timescales for issue of quotations is generally good.</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 checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV & above <input checked="" 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>Customers have benefitted from competition because it has caused SSEPD to review the manner in which it operates with resulting performance improvements. We would comment that the ability for any DNO to charge unregulated margin as proposed does not assist the customer from a price perspective. The competitive market does however give a customer a more traditional construction type contractor which often provides the customer with a greater degree of control, flexibility and often performance.</p>

Question	RMS(s)	DSA(s)	Response

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>	<p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV & above <input checked="" 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 would say that there is still ample opportunities for competitive growth in all areas of work type and location.</p>
<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</p>	<p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV & above <input checked="" 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 <input type="checkbox"/></p>	<p>SEPD <input checked="" type="checkbox"/></p> <p>SHEPD <input checked="" type="checkbox"/></p>	<p>a) SSE are certainly towards the top end of their competitor DNO's, are trying to move forward with the manner in which they operate. We would comment that they do not appear to be opening up customer / industry type interactions with the same verve as some of the other DNO's such as UKPN & WPD.</p> <p>b) We do not see any unfair advantage to using SSEPD rather than a competitor.</p> <p>c) We have not seen any real difference in how they interact with us whether we are dealing directly with them for a connection or using an ICP. In fact we would expect and see real</p>

Question	RMS(S)	DSA(S)	Response
<p>competitors to compete 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>	(Other)		improvements in using the competitive market as it gives us more control.
<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 checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV & above <input checked="" 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>SSEPD have made great in roads as to the level of detail provided in their breakdowns within the statutory connections and competitive quotations market but it is fair to say that a customer with little knowledge would perhaps struggle to understand them fully. We have also experienced differences in outputs dependant on the methods of application. We would further comment that with regard to the EHV DG market that the level of NC costs appear to be very expensive when compared to similar works of other DNO's (3-4 fold increases).</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 checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input checked="" 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>a) We would suggest that the potential is really based on the type of construction activities and area and also the particular type / area that ICP's /IDNO's themselves target.</p> <p>b) We would comment that due to the pure Geographic's there is less growth in the SHEPD area although in saying this some specialised ICP's have / are targeting particular DG type connections alongside attractive balance of plant type contracts.</p>

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 checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input checked="" 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"/>	<p>The figures appear lower than we would of expected for the Demand type ICP / IDNO markets and the huge increase in the number of DG type connections in the SEPD area perhaps slants the amount of overall competition that SSEPD have actually seen, when in reality they would not have been able to have carried out these works internally.</p>

	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 checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input checked="" 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"/>	Apart from the DG sector there is perhaps less competition than we perceived across the industry.

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 checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input checked="" type="checkbox"/> DG HV/EHV <input checked="" type="checkbox"/> Unmetered (LA) <input type="checkbox"/>	SEPD <input checked="" type="checkbox"/> SHEPD <input checked="" type="checkbox"/>	Customers do have a choice of ICP's / IDNO's although the reality of that competition is that the alternative markets are actually now themselves becoming dominated with a number of large organisations with tie in's between ICP's & IDNO's which themselves perhaps slant those markets. This does however demonstrate that the market is large enough to attract external players. The ability of SSE to charge margin should actually deliver the ability to drive through more competition but given

Question	RMS(S)	DSA(S)	Response
	Unmetered PFI <input type="checkbox"/> Unmetered (Other) <input type="checkbox"/>		the apparent lack of awareness of competition from the figures you could also argue that for the majority of customers it will only result in them paying more for the same service from SSEPD.
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 checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input checked="" 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"/>	Yes there is the opportunity for growth. One potential barrier for further growth might be that the industry has a shortfall in skilled engineering resource generally. This may act to be self-regulating unless the larger ICP's /IDNO's develop their own apprenticeship / training capabilities.
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 checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input checked="" 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"/>	Yes there is still lots opportunity for this but given the size of some of the companies within the competitive markets they are unable to capture the larger projects and do not have the size / stability /credibility that the larger customers require. There appears to be numbers of ICP's who are in fact sub contract organisations rather than truly end to end delivery companies which is another form of completion within the industry.

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 checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input checked="" 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>With the appropriate regulatory safeguards yes we would expect them to act in an appropriate manner albeit we would like to see a further increase in their efforts to raise awareness of the competitive marketplace / alternatives.</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 checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV & above <input checked="" 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>No Comments</p>

Question	RMS(S)	DSA(S)	Response