

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 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 checked="" type="checkbox"/>	<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
<b>One:</b> Are customers aware that competitive alternatives exist?	Metered HV <input checked="" type="checkbox"/>	SEPD <input checked="" type="checkbox"/>	Yes. This was also explained to me very clearly on a number of occasions.
	Metered HV/EHV <input type="checkbox"/>	SHEPD <input type="checkbox"/>	
	Metered EHV & above <input type="checkbox"/>		
	DG HV/EHV <input 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 checked="" type="checkbox"/> Metered EHV & above <input 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 checked="" type="checkbox"/> SHEPD <input type="checkbox"/>	Yes and some alternative companies were suggested to me. A very open and honest approach was taken by SSE in this matter
<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 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"/>	Yes they do at every turn. VERY OPEN AND also not in their interests.

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 checked="" type="checkbox"/></p> <p>DG HV/EHV <input 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 type="checkbox"/></p>	<p>Yes the quotations and letters accompanying them are clear, concise and does not use jargon. Also if you need an explanation of a point the SSE team are more than willing to have a conversation on the phone with the customer or in more difficult circumstances a meeting as well. Very impressive.</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 checked="" type="checkbox"/></p> <p>DG HV/EHV <input 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 type="checkbox"/></p>	<p>Customers have benefited much to the detriment of SSE financially. It should be noted that as SSE are so highly regulated and in a very difficult position to be more competitive and reactionary to the changing market place. There need to be the flexibility for SSE to have their own division, to help then reflect the growing need of the market.</p> <p>SSE timeline for delivery of project also makes them uncompetitive. As many of the ICP can do the job quickly. This is one area that OFGEM need to enable SSE to be more flexible and have the teams available at the right price and have the ability to start work on a project in the same timeframe as other ICP. SSE need to be able to match other quotes on a like for like basis both cost and timeframe for works.</p>

Question	RMS(s)	DSA(s)	Response
			<p>At the same time SSE connections team needs to have a great resources base to be able to meet the needs of customers in a more timely manner and be able to get quotes out more quickly. A ninety day turn around for a quotation is too long. Even if there was an initial study conducted that can give a level of reassurance to the customer within 15 days this would be a great help to all parties and give a clear go no go to them. Further the requirement to pay significant connection charges at the early stage is often hard for customers when they could easily be dependent on other factors i.e. planning permission / discharge of planning conditions. Etc. A 5% charge of the overall cost of the connection on acceptance of the quote that is refundable if the connection does not go ahead for whatever reason would be far more reasonable that 25% or 100%, yes this fee is recoverable but some time later and makes many projects by the mere factor of cash flow very tenuous for any third party.</p>

**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 type="checkbox"/></p> <p>Metered HV/EHV <input type="checkbox"/></p> <p>Metered EHV &amp; above <input type="checkbox"/></p> <p>DG HV/EHV <input type="checkbox"/></p> <p>Unmetered (LA) <input type="checkbox"/></p> <p>Unmetered PFI <input type="checkbox"/></p>	<p>SEPD <input type="checkbox"/></p> <p>SHEPD <input type="checkbox"/></p>	<p>N/A</p>

Question	RMS(S)	DSA(S)	Response
	Unmetered <input type="checkbox"/> (Other)		
<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 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>	Metered HV <input type="checkbox"/> Metered HV/EHV <input type="checkbox"/> Metered EHV & above <input 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 type="checkbox"/>	<p>b) Frankly SSE are at a distinct disadvantage in the market place and need to be able to react on a more level playing field. The ICP without the significant overheads financially on them are able to offer lower prices at the same time. As SSE have to react to on-going crisis or requirements across the group cannot have the teams available to do the works</p> <p>c) SSE does try to be flexible and assist in the connections but SSE resources are often stretched and make it difficult for them to be able to visit sites when ICP or other needs them. A more flexible approach where the ICP could contract in the SSE people as required, as and when they need them on a direct cost basis would be a great advantage to all.</p>

Question	RMS(S)	DSA(S)	Response
<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 type="checkbox"/></p> <p>Metered HV/EHV <input type="checkbox"/></p> <p>Metered EHV &amp; above <input type="checkbox"/></p> <p>DG HV/EHV <input 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 type="checkbox"/></p>	<p>I am not in a position to comment on the actual cost of equipment and the competitive nature of this.</p> <p>I do believe thought that SSE with it buying power could be able to assist a great deal other ICP and Customers by buying in bulk and being able to resell Transformers, inverters, cable to the ICP at cost plus say 10%. As this would significantly drive down the overall connection costs for customers. This would significantly alter the market and also would ensure that the equipment that customers are trying to connect to the network is compatible to SSE requirements straight away as SSE are in effect regulating the equipment. Obviously this would need to be an independent organisation doing this to ensure the transparency for all.</p> <p>This would also enable customers to secure equipment for their project at an early stage to the SSE specification and not be dependent on third party supplies often which can be unreliable and when deadlines are required unresponsive and can lead to failures to connect. This is especially true when it comes to OFGEM deadlines that make significant difference to the financial returns for a project.</p> <p>A clearer explanation and possibly a new subdivision of SSE to deal with the Non Contestable works would be very useful as customers would be able to secure the works at the right price but more significantly be able to do the work required in the substation when they require it to be done not when SSE is able to do the work.</p>

Question	RMS(S)	DSA(S)	Response
			<p>These changes would have a significant improvement to the delivery of project to customers and enable far more clarity on delivery of all aspect of projects. Improve the competitiveness of the market and enable SSE to become more customer focused in delivering customers requirements.</p>
<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>	<p>Metered HV <input type="checkbox"/></p> <p>Metered HV/EHV <input type="checkbox"/></p> <p>Metered EHV &amp; above <input type="checkbox"/></p> <p>DG HV/EHV <input 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 type="checkbox"/></p>	<p>N/A</p>

**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>	<p>Metered HV <input type="checkbox"/></p> <p>Metered HV/EHV <input type="checkbox"/></p> <p>Metered EHV &amp; above <input type="checkbox"/></p> <p>DG HV/EHV <input 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 type="checkbox"/></p>	<p>N/A</p>
<p><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?</p>	<p>Metered HV <input type="checkbox"/></p> <p>Metered HV/EHV <input type="checkbox"/></p> <p>Metered EHV &amp; above <input type="checkbox"/></p> <p>DG HV/EHV <input 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 type="checkbox"/></p>	<p>N/A</p>



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**Chapter Six**

Question	RMS(S)	DSA(S)	Response
<p><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?</p>	<p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV &amp; above <input checked="" type="checkbox"/></p> <p>DG HV/EHV <input 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 type="checkbox"/></p>	<p>a) yes – but SSE should be able to compete on a more level playing field</p> <p>b) yes</p>
<p><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?</p>	<p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV &amp; above <input checked="" type="checkbox"/></p> <p>DG HV/EHV <input 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 type="checkbox"/></p>	<p>Yes – But SSE should have the ability to price and have delivery times it sees fit NOT be regulated into what it can do . This needs to be a free market and over regulation will stifle this.</p>

Question	RMS(S)	DSA(S)	Response
<p><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?</p>	<p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV &amp; above <input checked="" type="checkbox"/></p> <p>DG HV/EHV <input 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 type="checkbox"/></p>	<p>Yes there is scope for more entrants to the market. But what would also help is as I have stated a separate division of SSE to have the ability to be independent of SSE to:</p> <ol style="list-style-type: none"> <li>1) buy equipment that it can resell to customers on a fixed margin basis including SSE itself</li> <li>2) a Connections Team that can give faster quotes</li> <li>3) a lower percentage of payment of quote Acceptance to connect</li> <li>4) A non contestable works division to do the works when the customer wants not SSE, with a far clearer price structure and basis</li> <li>5) An SSE ICP Team that can do the works and be free of the constraints of the regulated SSE Requirements</li> <li>6)</li> </ol>
<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>	<p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV &amp; above <input checked="" type="checkbox"/></p> <p>DG HV/EHV <input 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 type="checkbox"/></p>	<p>Yes as long as there is a spate division as mentioned above. Not tied to the main organisation and not with any SSE personal from the main company on the board. This has to be a truly independent organisation that can use SSE resources but NOT be responsible to SSE.</p>

Question	RMS(S)	DSA(S)	Response
<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>	<p>Metered HV <input type="checkbox"/></p> <p>Metered HV/EHV <input type="checkbox"/></p> <p>Metered EHV &amp; above <input type="checkbox"/></p> <p>DG HV/EHV <input 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 type="checkbox"/></p>	<p>Not able to answer</p>