

James Veaney
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Smarter Grids and Governance
Ofgem
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By email only to connections@ofgem.gov.uk

Dear James

Incentive on Connections Engagement (ICE) Guidance Document consultation

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. Our response is not confidential and can be published via the Ofgem website.

We note the inclusion of multi utility wording in paragraph 1.3 but believe this could be improved with wording that makes it clear that a multi utility approach is just one of many solutions which may drive improvements for customers. Our detailed feedback including proposed amended wording in respect of the multi utility paragraph can be found in the appendix to this letter.

If you have any queries please do not hesitate to contact me in the first instance.

Yours sincerely



Keith Hutton
Head of Regulation
UK Power Networks

Copy Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks

Appendix

1. Paragraph 1.4 should cross reference Table 1 and not Paragraph 1.6
2. We note the addition of new multi utility wording in paragraph 1.3 but believe this could be improved by its replacement with the following wording which makes it clear that multi utility is just one of many solutions which may drive improvements for customers:
“This incentive may drive innovative connection solutions for customers which may include for example;
 - a. *improved coordination with other utility connection providers*
 - b. *innovative commercial arrangements with customers*
 - c. *the introduction of new technologies that reduce connection charges for customers”*
3. Paragraph 1.11 should cross reference paragraph 1.12 and not 1.122
4. Paragraph 1.22(a) refers to DG Forums. Bearing in mind this document should be fit for purpose for the whole of RIIO-ED1, it would be sensible not to refer to events/activities that might not be taking place (or might be taking place under a different name) in eight years' time
5. Paragraph 1.22(c) refers to the penalty consultation and could be interpreted as consulting on the scale/size of the penalty rather than whether a penalty should be applied. It is our understanding that the consultation is only on the application of a penalty per market segment and therefore believe that wording to clarify this should be included. Changes to further clarify this should also be made in 1.22(b) by adding “and apply a pass or fail criteria to each segment” to the end of the first paragraph.
6. The reference to there being no restriction on the font size in paragraph 1.25 should be caveated such that the submission must be legible
7. Paragraph 1.29 is currently worded as “expect” a DNO to publish a report but does not explicitly require a DNO to publish it. We propose changing “expect” to “require” to remove this lack of clarity.
8. We support the option given in paragraph 1.30 for Ofgem to extend the deadline dates given in the document. However, we seek clarity that Ofgem has the vires to grant this permission and if it has the vires to then bolster the wording in this section to clarify the process to see an extension, under what circumstances an extension may be granted and that such a request must be made before the deadline.