

Competition in Connections Code of Practice

Annual Report 2019/20

Introduction

A requirement of the Competition in Connections Code of Practice is that DNOs report annually to demonstrate its compliance with the Code of Practice as required by Standard Licence Condition 52.

This template has been developed in conjunction with stakeholders to help facilitate common reporting. It is deemed that completion of this template shows that the DNO has fulfilled the specific requirements identified in the Code of Practice in the following paragraphs:

9.1. Each DNO shall publish an annual report by the end of September each year to demonstrate their compliance with this code of practice. This report shall include reporting on the volume of inspections by the DNO on connections completed by all parties (including the DNO's own business or affiliates and competitors).

9.2. The report will include such detail on processes and procedures and available metrics to demonstrate the DNO is providing the equivalent level of service to independents as to them undertaking connection activities themselves for each of the Input Services.

WPD has published the CIC Code of Practice and Annual Report at

<http://www.westernpower.co.uk/connections-landing/competition-in-connections/competition-in-connections-code-of-practice>

DNOs must also meet Ofgem obligations on reporting included in Standard Licence Condition 45, Data Assurance requirements. This condition requires the DNO to undertake processes and data assurance activities. These are to reduce the risk (and subsequent impact and consequences) of any inaccurate or incomplete reporting or misreporting of information to Ofgem. The DNO must undertake a risk assessment of each submission and set out its data assurance activities to manage the risk, which may include independent review. The DNO must have in place and maintain appropriate systems, processes, and procedures to enable it to perform its obligations.

To ensure consistency of reporting, quantitative information included in this report will generally relate to the previous regulatory year (1 April to 31 March inclusive). In the first year of reporting (September 2016), the information will only include part year information due to the implementation date of the obligation. Information on processes should be as contemporary as possible to the date of publication.

The format of the template includes the specific obligations that DNOs must report on as a direct extract from the Code of Practice, shown in a blue box. Note that the subsequent paragraph references contained in this document relate to those in the Code of Practice and are therefore not sequential. DNOs should complete the black part of the template to demonstrate compliance. This could include narrative, examples, reference to other documents, web links etc.

Change Control

Version number	Date	Brief description of change
1.0	11/07/2016	Reporting Requirements template approved by Ofgem
2.0	18/01/2017	Changes made to text to bring in line with changes made within the main Competition in Connections Code of Practice document.

Updated Content

Year of Report	Clause	Brief Description of Change
16/17	Introduction	Reference to webpage where the CIC COP and Report are published.
16/17	4.3.2	CIC Awareness survey results
16/17	4.6.1	Planning Data Portal updated to Version 2
16/17	5.2.3	Details of Option 4 trial
17/18	4.9	Extended scope for designing the point of connection using a matrix or simplified process
17/18	4.16	Revised process to improve ICP's ability to move between inspection levels
17/18	5.2.3	Removed the restriction on overhead from physical connection works to the existing network carried out by an ICP
17/18	6.2	Inspection performance reports

4.3 The Connection Application

4.3.2 On receiving a Connection request, the DNO will provide the Customer with a detailed explanation of the competitive Connections market and ICPs that may be available in their Distribution Services Area.

We advise customers that they have a choice with regards to who delivers their connection requirements in multiple locations:

UPDATED

- Our application section of the website, available to view at www.westernpower.co.uk/connections-landing/connecting-dwellings-or-commercial-premises contains the following paragraph:

"Whether it's a small domestic dwelling, a whole housing estate, a small business or a large commercial development, we can complete the entire connection works or you can choose a competitive connection provider to do some of the work"

- Our application forms, available to be posted or emailed on request and available to download from the website, contains the following paragraph on the front page:

"Did you know?"

You can get a quotation from an Independent Connections Provide (ICP) or Independent Distribution Network Operator (IDNO) for your electricity connection. We can provide you with a complete connection service but you may also ask an ICP or IDNO to undertake some of the works (known as the 'contestable works').

NEW

- Our website has been updated to include online connection application forms, available on the website at www.westernpower.co.uk/connections-landing/connections-online-application-form contain the following emboldened information box when "Connection Offer" is chosen:
- *"Did you know that you have a choice of connection providers, known as Independent Connection Providers (ICP's) to provide part of the connections work, known as Contestable works. We would then carry out the Non-contestable works only. Please visit our Competition in Connections page for more information"*
- Our connection offers include a CiC Factsheet. This leaflet is available by post, email and on our website at www.westernpower.co.uk/connections-landing/competition-in-connections/information-for-customers

Our call handlers in our contact centres have guidance information to provide customers with relevant information regarding competitive connection options and are able to direct customers to further information, such as the website.

UPDATED

We publish useful information on our website, such as "What is an ICP?", "What is an IDNO?", "How to find an ICP" and an illustration of contestability. All information is available to view at www.westernpower.co.uk/connections-landing/competition-in-connections. We also include a link to the Lloyds Register website and provide a list of ICPs who have requested inclusion as currently active in WPD's regions. At present, there are 54 ICPs who have requested inclusion on this list.

We carry out an annual survey to measure customer awareness of competitive connection providers. The survey showed that, in 2019-20, 83% of customers who obtained a connection were aware of other providers.

See Appendix A - CiC Factsheet



4.3.3 In addition, each DNO will ensure that its website contains consistent and clear information for Connection Customers that enables them to access the competitive Connections' market.

We have a dedicated Competition in Connection section within our website, <http://www.westernpower.co.uk>. From the home page, you can navigate in two clicks via the 'Connections' link. Within the Competition in Connections section, there are sub-pages to enable visitors to obtain more detailed information, such as information for customers, information for ICPs, policy documents and the Competition in Connections Code of Practice.

UPDATED

[Our website](#) includes a link to the Lloyds Register website to find a list of ICPs and the Ofgem website to find a list of IDNOs. There is an additional link to a list of ICPs that have requested inclusion as currently active in WPD's area. At present, there are 54 ICPs who have requested inclusion on this list.

The Competition in Connections leaflet is available on our website at:

www.westernpower.co.uk/connections-landing/competition-in-connections/information-for-customers

4.3.4 Where the Customer makes a request to the DNO for a Connection in a Relevant Market Segment, the DNO shall provide the Customer with a Convertible Quotation. The Customer can either accept the Convertible Quotation or provide the Point of Connection to an ICP in order to obtain a competitive quote for the Contestable Works. The Customer can then choose whether it wants the DNO or an ICP to carry out all or some of the Contestable Work.

WPD's Estimating and Charging system enables all connection offers provided to customers in relevant market segments to be provided on a convertible basis via the Dual Offer process, such that the customer may appoint an ICP to carry out some or all of the contestable works, or accept the offer on the basis that WPD carries out both the non-contestable and contestable works. ICPs can continue to request an offer for non-contestable works only. This is reported to Ofgem as part of the Connections Reporting Pack CR7 table.

See Appendix B – Dual Offer

4.3.5 As part of producing a Convertible Quotation the DNO will determine:

- the Point of Connection to its Distribution System;*
- whether any reinforcement of the existing Distribution System is required;*
- whether part of the Distribution System needs to be diverted;*
- the Convertible Quotation the DNO issues shall contain details of:*
 - *the charges for the Non-Contestable Works;*
 - *the charges for Contestable Works;*
 - *the work and costs of providing the new Connection; and*
 - *the options the Customer has for accepting the quotation or progressing with an ICP.*

WPD's Dual Offer letters, as referenced in 4.3.4, include these elements.

See Appendix B – Dual Offer

4.3.6 The charges for the Non-Contestable Works in a Convertible Quotation shall be comparable irrespective of whether an ICP or the DNO undertakes the Contestable Works.

The non-contestable physical works costs will be identical regardless of which option the customer chooses. However, assessment and design fees will differ depending on whether WPD or the ICP are designing the contestable works (and subject to the ICP undertaking self-design approval and/or self-determination of the point of connection processes). The overall charges for the non-contestable works will differ where inspections of work are required, dependent upon the level of inspections required for any given ICP/IDNO. Our extension of contestability allows companies to reach self-inspection level in which case no inspection charges will be required. At the point of quotation, the appointed ICP may be unknown; in which case the inspection charges applied will be based on an ICP subject to WPD inspection level 1.

4.5 Determining whether ICP can undertake assessment of POC

4.5.2 The DNO will publish circumstances, and the reasons why, where an Accredited ICP cannot undertake the assessment of the Point of Connection. The ICP will be unable to determine the Point of Connection because the DNO:

- *has not made sufficient information available; and/or*
- *has stated that only it can undertake the assessment.*

WPD's Standard Technique ST:SD1F specifies the procedure for WPD and ICP's where an ICP is to determine the Point of Connection and/or self-approve the scheme design. Section 6 of this ST sets out the connection types for which self-determination of the POC is available and details the circumstances where an ICP cannot undertake the assessment of the POC. ST:SD1F is available both internally to WPD staff and externally to ICPs/IDNOs and customers at www.westernpowertechinfo.co.uk in the Design Standards section.

See Appendix C – SD1F_3

4.6 DNO Input Services where the ICP determines the POC

4.6.1 The DNO will make available access to such information as the ICP is reasonably likely to require in order to assess the Point of Connection. This information will be available on an equivalent basis as it is to the DNO, normally on a 24/7 basis. The information will enable ICPs to either:

- i) self-select a Point of Connection in combination with the Standard Design Matrix (see section 4.9 below); or*
- ii) carry out assessment and design of the Point of Connection using the DNO's standards and process utilising the technical competency of the ICP's design team (see section 4.10 below).*

To enable self-determination of a point of connection, ICP's have access to data, equivalent to that available internally to WPD, where applicable to the scope of the self-determination procedures. The majority of this is available on a 24/7 basis as set out below, with some information provided directly by the local team on request and in a timely manner.

1. Network information is available to registered users via the WPD Planning Data Portal² on a 24/7 basis. Guidance to mapping information is also available.

Relevant links to register for the data portal and view guidance documents or plans are available at <http://www.westernpower.co.uk/our-network/network-plans-and-information>

2. Substation and plant details can be accessed by IDNOs & ICPs via the CIRT system on a 24/7 basis.
3. Some information is available from local teams; HV feeder demand data (via Data Logger), earthing arrangements and IDNO Agreed Supply Capacities;
4. Information at higher voltages is available from WPD Primary System Design; Primary Substation protection data, automatic voltage control settings, earthing arrangements close to Primary Substations. Where information is readily available from WPD systems, it is available within 5 working days. If on-site monitoring is required it may take up to 6 weeks.

See Appendix D – CIRT Substation Demand User Guide

4.6.2 Such information will include:

- - *geographical network records showing the location, size and type of assets;*
- - *load information for the Distribution System, including guidance on the rules to be applied when allocating demand diversity of new and existing Customers to circuits;*
- - *relevant design standards and documents (e.g. the Energy Network Association's engineering recommendation G81);*
- - *asset sizes and ratings;*
- - *network operational diagrams.*

The relevant information required is available via the resources set out below:

1. Network information is available via the WPD Planning Data Portal, for which users can register at www.westernpower.co.uk/our-network/network-plans-and-information
2. Substation and plant details can be accessed by IDNOs & ICPs via the CIRT system. Users can request access or login to the CIRT system via www.westernpower.co.uk/connections-landing/information-for-icps-and-idnos/online-services
3. Some information is available from local team; HV feeder demand data (via Data Logger), earthing arrangements and IDNO Agreed Supply Capacities;
4. Information at higher voltages is available from WPD Primary System Design; Primary Substation protection data, automatic voltage control settings, earthing arrangements close to Primary Substations.
5. Design standards and documents. G81 is available on WPD's website at www.westernpower.co.uk/connections-landing/information-for-icps-and-idnos/technical-policy-and-engineering-documents

WPD developed a technical information section on our website at www.westernpowertechinfo.co.uk. This provides online access to technical specifications and policy documents. Users can register for access to receive regular notifications of updates to the documents available on the website.

4.8 Point of Connection Accreditation

4.8.2 Each DNO will, at least annually, assess the areas where accreditation is not available and ensure that the NERS Accreditation Body is aware of these omissions from the overall NERS scheme. Once these have been identified the DNOs will work with NERS to put in place the appropriate scope changes or additions to increase areas of accreditation where practicable.

WPD, together with other DNOs, is a member of NERSAP and the NERS Provider Forum. These are regular meetings with the inclusion of DNO's, ICP's, IDNO's and Lloyds Register which helps to collectively identify gaps in the accreditation processes or the need for further refinement.

As an example, the NERSAP Panel requested that Lloyds Register provide clarification on what the Self Determination of PoC scopes cover. In addition, the NERS Guidance Document has been amended, and a further amendment requested by NERSAP to include the description of what each scope covers. A working group is looking into what changes are required ahead of implementing the changes into the NERSAP Guidance Document.

4.9 POC assessment Using Standard Design Matrix

4.9.1 Some Point of Connection designs can be determined using a Standard Design Matrix. To facilitate this, the DNO shall publish an up-to-date Standard Design Matrix for use by the ICP. Figure 3 below sets out the key process steps in using the Standard Design Matrix.

WPD previously published a summary of the arrangements under which a low voltage connection up to 200kW could be designed with minimal network analysis. This was set out in Standard Technique SD5B. WPD have since expanded the scope of 'matrix' or simplified connections as set out in the following standard techniques:

ST:SD5F relating to connecting multiple small low voltage connections, specifying the procedure for connecting multiple street furniture connections (metered or unmetered) with a demand of up to 5kVA with minimal design analysis and minimal input services from WPD;

ST:SD4D for the use of simplified load flow techniques for 11kV network design, specifying the requirements for using simplified load flow analysis techniques by both WPD planners and ICPs where the relevant criteria are met; and

ST:SD4E relating to High Voltage connections with minimal network analysis, specifying the requirements for using matrix type load flow analysis techniques by both WPD planners and ICPs where the relevant criteria are met.

These design standard technique can be found on WPD's Technical Information micro website www.westernpowertechinfo.co.uk.

**See Appendices E – SD5B_1
F - SD4D
G – SD5F
H – SD4E**

4.9.2 To allow the ICP to use the Standard Design Matrix the DNO will provide the following;

- *the process to be applied when using the Standard Design Matrix;*
- *a Standard Design Matrix that will assist in assessing the capacity that can be connected to an existing network;*
- *capacity data to be used within the Standard Design Matrix; and*
- *geographical network data to allow the ICP to check where the Point of Connection is to be located on the DNO's Distribution System.*

The standard techniques referred to in 4.9.1 can be found on WPD's technical information section of our website under Design Standards.

They include:

- (1) the process to be applied by both WPD staff and ICP staff when using the Standard Design Matrix
- (2) an explanation of the maximum demand and load requirements within the Standard Design Matrix

The CIRT online system provides substation & customer details. Other capacity data is available from local teams.

Geographical network data is available from the WPD Planning Data Portal (<http://www.westernpower.co.uk/planningdata>)

See Appendices E to H as referenced in 4.9.1

4.11 Information Exchanges

4.11.1 The ICP and DNO shall each use their reasonable endeavours to exchange information required to determine the Point of Connection. The information from the ICP will be provided at the following stages:

- *Point of Connection Notice* – when the ICP commences investigating a Point of Connection;
- *Point of Connection Issue* – when the ICP issues a quotation to a Customer; and
- *Point of Connection Acceptance* – when the Customer accepts the quotation issued by the ICP.

4.11.4 The DNO will ensure that all relevant information is made available to the ICP either on-line or on request.

ICPs and IDNOs are able exchange information via the online CIRT system providing an ICP with the ability to submit applications, track applications and obtain substation details. Working closely with ICP and IDNO representatives we also developed an email process which could be used as an alternative to CIRT for submitting connection applications. Using either CIRT or the email process, ICPs must notify WPD at the following stages:

- ***Point of Connection Notice*** – when the ICP commences investigating a Point of Connection; within 5 days, WPD will provide the ICP with any relevant information relating to network constraints, upstream reinforcement, interactivity, regulatory payments such as potential refunds or apportionments which would preclude the ICP/IDNO from POC design, as it is not compliant with the Code of Practice.

Local WPD team will provide the ICP with requested data on agreed supply capacities for existing embedded networks, earthing arrangements for substations, protection arrangements for substations, earthing arrangements for the LV network and feeder load data for HV networks. Primary System Design will provide the relevant data about earthing arrangements close to Primary substations, protection data for Primary substations and HV feeders, and data required for the calculation of the Rise of Earth Potential at Distribution Sites.

If a scheme does not progress to the Issue stage after 20 working days, WPD will close the enquiry.

- ***Point of Connection Issue*** – when the ICP issues a quotation to a Customer; WPD will log the details for future reference for further associated connection applications. Where a quote becomes interactive with a subsequent WPD or ICP quote, WPD will notify that a quote would no longer be compliant with the Code of Practice.

Offers are valid for 90 days from the date of the Offer letter, after which it will automatically expire.

- ***Point of Connection Acceptance*** – when the Customer accepts the quotation issued by the ICP, the ICP notifies us and WPD considers the accepted capacity as being committed on the network.

We have implemented a new online connections portal for ICP's which can also be used to submit applications for connection and self-determined Points of Connection. Any

submissions issued via the ICP Portal will then follow the email process for ongoing communication between WPD and the ICP.

4.12 Self Determination Information

4.12.1 Each DNO will publish when an ICP can self-determine their own POC utilising the common template below.

Market Segment	Self Determination Available (Yes/No)	Comment
LV demand		
HV demand		
HVEHV demand		
EHV132 demand		
DG LV		
DGHVEHV		
UMS LA		
UMS Other		
UMS PFI		

UPDATED

The populated common table, as shown below, identifies the Market Segments for which ICP's can self-determine their own Point of Connection (POC). This table is available to view on our website at www.westernpower.co.uk/Connections/Competition-in-Connections/Extension-of-Contestability-Trials.aspx. In addition, it is published within our Standard Technique SD1F which is available on the Technical Information micro website.

Market Segment	Self Determination Available (Yes/No)	Comment
LV demand	Y	Matrix available
HV demand	Y	Simplified design process available in accordance with ST:SD1F
HVEHV demand	N	
EHV132 demand	N	
DG LV	N	
DGHVEHV	Y	Limited to 50kW on DGHV schemes (installed generation capacity)
UMS LA	Y	
UMS Other	Y	
UMS PFI	Y	

See Appendix C – SD1F_3

4.12.2 Each DNO will publish the criteria by which an ICP can determine their own POC utilising a Standard Design Matrix utilising the common template below.

Criteria	Measurement	Comment
Connection capacity		
Distance to substation		
Service cable length		
Transformer Capacity		
Asset types excluded		

The populated common table, as shown below, identifies the criteria by which an ICP can determine their own Point of Connection (POC) utilising a Standard Design Matrix. This table is available to view on our website at www.westernpower.co.uk/Connections/Competition-in-Connections/Extension-of-Contestability-Trials.aspx In addition, it is published within our Standard Technique SD1F which is available on the Technical Information micro website.

Criteria	Measurement	Comment
Connection capacity	200kVA maximum	Reduced to 150kVA maximum for 6.6kV networks
Distance to substation	200m	Increased to 250m for capacity less than 150kVA
Service cable length	30m	
Transformer Capacity	315kVA and above	Restriction on total load on single LV fuse way
Asset types excluded	None	

See Appendix C – SD1F_3

Table 1: Information on Self Determination of Points of Connection Regulatory Year 2019/20 WPD East Midlands

Market Segment	Self Determination Available (Yes/No)	Comment	Number of DNO Quotes Issued 2019/20	Number of SLC15 Quotes Issued 2019/20	Number of Self Determined by Standard Design Matrix	Number of Self Determined by Technical Competence
LV demand	Y	Matrix available	8,490	1,042	4	3
HV demand	Y	Simplified design available	1,466	1,477	-	-
HVEHV demand	N		16	30	-	-
EHV132 demand	N		1	10	-	-
DG LV	N		25	-	-	-
DG HVEHV	N		121	30	-	-
UMS LA	Y		80	n/a	-	-
UMS Other	Y		396	n/a	-	-
UMS PFI	Y		0	n/a	-	-

The DNO quotes issued include dual offers with an Option 1 for WPD to carry out all of the works and an Option 2 for WPD to carry out only the non-contestable works. The customer may accept either option and appoint an ICP if they proceed with Option 2.

Table 1: Information on Self Determination of Points of Connection Regulatory Year 2019/20 WPD West Midlands

Market Segment	Self Determination Available (Yes/No)	Comment	Number of DNO Quotes Issued 2019/20	Number of SLC15 Quotes Issued 2019/20	Number of Self Determined by Standard Design Matrix	Number of Self Determined by Technical Competence
LV demand	Y	Matrix available	7,596	963	15	4
HV demand	Y	Simplified design available	1,636	1,235	-	-
HVEHV demand	N		12	24	-	-
EHV132 demand	N		3	6	-	-
DG LV	N		9	-	-	-
DG HVEHV	N		89	9	-	-
UMS LA	Y		71	n/a	-	-
UMS Other	Y		387	n/a	-	-
UMS PFI	Y		0	n/a	-	-

The DNO quotes issued include dual offers with an Option 1 for WPD to carry out all of the works and an Option 2 for WPD to carry out only the non-contestable works. The customer may accept either option and appoint an ICP if they proceed with Option 2.

Table 1: Information on Self Determination of Points of Connection Regulatory Year 2019/20 WPD South Wales

Market Segment	Self Determination Available (Yes/No)	Comment	Number of DNO Quotes Issued 2019/20	Number of SLC15 Quotes Issued 2019/20	Number of Self Determined by Standard Design Matrix	Number of Self Determined by Technical Competence
LV demand	Y	Matrix available	3,240	111	2	-
HV demand	Y	Simplified design available	717	179	-	-
HVEHV demand	N		2	-	-	-
EHV132 demand	N		0	-	-	-
DG LV	N		7	2	-	-
DG HVEHV	N		64	5	-	-
UMS LA	Y		121	n/a	-	-
UMS Other	Y		216	n/a	-	-
UMS PFI	Y		0	n/a	-	-

The DNO quotes issued include dual offers with an Option 1 for WPD to carry out all of the works and an Option 2 for WPD to carry out only the non-contestable works. The customer may accept either option and appoint an ICP if they proceed with Option 2.

Table 1: Information on Self Determination of Points of Connection Regulatory Year 2019/20 WPD South West

Market Segment	Self Determination Available (Yes/No)	Comment	Number of DNO Quotes Issued 2019/20	Number of SLC15 Quotes Issued 2019/20	Number of Self Determined by Standard Design Matrix	Number of Self Determined by Technical Competence
LV demand	Y	Matrix available	6,630	201	4	1
HV demand	Y	Simplified design available	1,451	471	-	-
HVEHV demand	N		3	5	-	-
EHV132 demand	N		0	4	-	-
DG LV	N		13	-	-	-
DG HVEHV	N		73	14	-	-
UMS LA	Y		285	n/a	-	-
UMS Other	Y		353	n/a	-	-
UMS PFI	Y		0	n/a	-	-

The DNO quotes issued include dual offers with an Option 1 for WPD to carry out all of the works and an Option 2 for WPD to carry out only the non-contestable works. The customer may accept either option and appoint an ICP if they proceed with Option 2.

4.13 Connection Design

4.13.2 In designing the Connection the ICP shall take account of any reasonable requirements of the DNO, and all of the DNO's design standards in place at the time. All relevant design standards and specifications, such as G81, will be made available.

ICPs are provided with technical information to assist them with the site design and procurement and installation of materials. The relevant documentation is available on WPD's website and is referenced in the Connection Offer:

ICPs are required to work to the National Framework documents, Electricity Association Engineering Recommendation G81 and the associated WPD Framework Appendices.

G81 National Framework documents and WPD's Design Framework Appendix are available on WPD's website at www.westernpower.co.uk/connections-landing/information-for-icps-and-idnos/technical-policy-and-engineering-documents

The technical information section of our website provides online access to technical specifications and policy documents. Users can register for access to receive regular notifications of updates to the documents available on the website.

4.13.3 Where the Connection Works are to be adopted by an IDNO, the DNO shall not require unduly onerous boundary requirements between the IDNO's network and the DNO's Distribution System. Where the DNO requires additional assets to be provided at the boundary (other than those it would require if it was connecting the Connection Works to its own Distribution System) the DNO shall set out the reasons.

It is WPD policy not to require a link box at the interface between WPD's distribution system and the IDNO network, under normal circumstances. There is also no requirement for a physical joint. In instances where cable terminates directly to WPD assets (e.g. substations/feeder pillars), the DNO/IDNO boundary will be an agreed specified location, usually 1m from the boundary of WPD's asset to allow the IDNO room to carry out works on their network without impeding into WPD's working areas.

On the rare occasion that WPD does require a link box, WPD will procure and install one at no cost to the IDNO.

If the IDNO contests the procurement and installation of the link box in accordance with Competition in Connection rules the IDNO may invoice WPD for its reasonable costs.

Where an IDNO requires a link box or feeder pillar, the IDNO will procure and install one at their own expense.

See Appendix I – NC6A_7

4.16 Design Approval

4.16.3 DNOs shall complete and publish the following standard tables on their website.

The proposed tables would be set out as follows:

Table One – The market segments where the ICP is able to self-approve its designs

Market Segment	Self Approval Available (Yes/No)	Comment
LV demand		
HV demand		
HVEHV demand		
EHV132 demand		
DG LV		
DG HVEHV		
UMS LA		
UMS Other		
UMS PFI		

Table Two - Qualifying criteria that will apply to allow an ICP to move between the different levels of design approval

Level	Criteria
1	
2	
3	
Etc	<i>ICP fully able to self-approve contestable designs*</i>

*If applicable

The populated common tables, as shown below, identify the Market Segments for which ICP's can self-approve their own designs and the criteria by which they can move between audit levels. These tables are available to view on our website at www.westernpower.co.uk/Connections/Competition-in-Connections/Extension-of-Contestability-Trials.aspx In addition, they are published within our Standard Technique SD1F_3 which is available on the Technical Information micro website.

We carried out a review of the requirements to move between inspection levels following ICP feedback. As a result, we have reduced the number of successful audits required to move from Level 2 to Level 3, or from Self-audit level 1 to Self-audit level 2. In addition we have reduced the number of inspections to be carried out for ICP's who achieve inspection level 3 from 25% to 5%.

Market Segment	Self Approval Available (Yes/No)	Comment
LV demand	Y	
HV demand	Y	
HVEHV demand	N	
EHV132 demand	N	
DG LV	N	
DG HVEHV	N	
UMS LA	Y	
UMS Other	Y	
UMS PFI	Y	

Level	Criteria
1	100% Audit, 20 audits to move to level 2
2	50% Audit, 5 audits to move to level 3
3	5% Audit
Self-audit level 1	5% Audit, 5 Audits to move to self-audit level 2
Self-audit level 2	2% audits

See Appendix C – SD1F_3

4.16.4 Where an ICP, having met the criteria set out by the DNO, undertakes design approval of the Connection Works the ICP shall not require design approval from the DNO. However, the ICP may still ask the DNO to approve or validate the design.

An ICP who meets the criteria for design self-approval can still ask WPD to approve the design.

If the ICP is requesting to Self-approve their own design, they must be signed up to the Framework Network Access and Adoption Agreements and they must submit their enquiry via the CIRT route or the new email process.

WPD's ICP Operating Manual, available on the technical information section of our website, provides an explanation of "CROWN Process and enquiry route for CIRT enabled enquiries" (p47) and Design Approval where the ICP is not self-approving their design (page 40).

WPD's Standard Technique ST:NC2F/4 and ST:SD1F/3 on Design approval are available on the technical information section of our website.

See Appendix J – NC2M_4, Appendix K - NC2F_4 and Appendix C – SD1F_3

4.16.6 Where the design approval for Contestable Works is to be undertaken by an Accredited ICP, the ICP shall nevertheless submit the approved design to the DNO for inspection. As construction shall not need to wait to commence, such inspection shall not unduly delay the ICP in carrying out its works. Such inspection shall not exceed the level of inspection the DNO employs in its own connection services. To assist the inspection, the DNO may request the ICP to provide additional information. Where the inspection identifies non-conformance with the DNO's design standards or there was an issue with the POC, the DNO shall notify the ICP of such non-compliances and any required corrective actions. The DNO shall be entitled to re-inspect the design following completion of the corrective actions by the ICP.

Where the ICP undertakes self-approval of its designs, they shall submit their design to WPD for inspection. The inspection itself would not be required to be completed prior to works commencing and therefore the ICP will not be unduly delayed in proceeding with the works. Inspections are also carried out on the physical works to construct the network.

- As audits are completed, ICP's will move through the differing levels of inspection which decrease the percentage of inspections required. Once they have attained level 3 in all areas, in which 5% of schemes will be inspected, ICP's can apply to move to a self-inspection level which is consistent with WPD's own inspection level.

Where failures occur, they shall be recorded on the appropriate form. Failures are pre-allocated a severity Category:

Category 1: is a severe or dangerous defect where there is a serious non-compliance with WPD's policies and procedures or the Framework Network Access and Adoption Agreement. Such defect will result in immediate suspension of that specific activity of work by the ICP on that site.

Category 2: is a serious defect where there is a serious non-compliance with WPD's policies and procedures or the Framework Network Access and Adoption Agreement. Such defect may not be recoverable at the time of inspection, may result in failure to adopt the asset until rectified. Further inspections will normally be required. In this instance WPD may determine the action required to rectify the defect.

Category 3: is a minor defect resulting from a minor non-compliance with WPD's policies and procedures or the Framework Network Access and Adoption Agreement. Such defect will normally be recoverable at the time of inspection and will not require further inspections.

The process for managing failures is included within the ICP Operating Manual, Standard Technique NC2N. This operating manual adheres to the inspection and monitoring regime, as detailed in Standard Technique NC2M. Both of these documents are available to ICP's on the Technical Information website.

See Appendix J – NC2M_4 and Appendix L – NC2N

4.16.8 If the DNO has any concerns as to the competency of the Accredited ICP this must be highlighted to the NERS service provider and the ICP.

As per the processes outlined within Standard Techniques NC2M and NC2N, failures are recorded within WPD's Crown system within the Inspection and Monitoring regime tables. The inspectors report will be submitted to the ICP, with photographs where appropriate, within 2 working days following the issue of an automated email from the Crown system. The site inspection forms and any supporting evidence, such as photos, are electronically stored for future referral, as and when required. This evidence will support the escalation processes detailed in the Standard Techniques.

See Appendix J – NC2M_4 and Appendix L – NC2N

Table 2: Information on Self Approval of Designs 2019/20 WPD East Midlands

Market Segment	Self Approval Available (Yes/No)	Comment	Number of SLC15 Designs Approved 2019/20	Number of Self Approved Designs 2019/20
LV demand	Y		122	51
HV demand	Y		136	11
HVEHV demand	N		9	N/A
EHV132 demand	N		-	N/A
DG LV	N		-	N/A
DG HVEHV	N		3	N/A
UMS LA	Y		N/A	N/A
UMS Other	Y		N/A	N/A
UMS PFI	Y		N/A	N/A

The number of SLC15 designs approved includes only those which were successfully approved and excludes any submissions which were rejected. Unmetered connections are not required to go through the formal design approval process, therefore no volumes for unmetered design self-approval have been recorded.

Table 2: Information on Self Approval of Designs 2019/20 WPD West Midlands

Market Segment	Self Approval Available (Yes/No)	Comment	Number of SLC15 Designs Approved 2019/20	Number of Self Approved Designs 2019/20
LV demand	Y		138	61
HV demand	Y		132	11
HVEHV demand	N		11	N/A
EHV132 demand	N		-	N/A
DG LV	N		-	N/A
DG HVEHV	N		-	N/A
UMS LA	Y		N/A	N/A
UMS Other	Y		N/A	N/A
UMS PFI	Y		N/A	N/A

The number of SLC15 designs approved includes only those which were successfully approved and excludes any submissions which were rejected. Unmetered connections are not required to go through the formal design approval process, therefore no volumes for unmetered design self-approval have been recorded.

Table 2: Information on Self Approval of Designs 2019/20 WPD South Wales

Market Segment	Self Approval Available (Yes/No)	Comment	Number of SLC15 Designs Approved 2019/20	Number of Self Approved Designs 2019/20
LV demand	Y		25	13
HV demand	Y		22	2
HVEHV demand	N		-	N/A
EHV132 demand	N		2	N/A
DG LV	N		-	N/A
DG HVEHV	N		-	N/A
UMS LA	Y		N/A	N/A
UMS Other	Y		N/A	N/A
UMS PFI	Y		N/A	N/A

The number of SLC15 designs approved includes only those which were successfully approved and excludes any submissions which were rejected. Unmetered connections are not required to go through the formal design approval process, therefore no volumes for unmetered design self-approval have been recorded.

Table 2: Information on Self Approval of Designs 2019/20 WPD South West

Market Segment	Self Approval Available (Yes/No)	Comment	Number of SLC15 Designs Approved 2019/20	Number of Self Approved Designs 2019/20
LV demand	Y		27	23
HV demand	Y		50	7
HVEHV demand	N		-	N/A
EHV132 demand	N		1	N/A
DG LV	N		-	N/A
DG HVEHV	N		2	N/A
UMS LA	Y		N/A	N/A
UMS Other	Y		N/A	N/A
UMS PFI	Y		N/A	N/A

The number of SLC15 designs approved includes only those which were successfully approved and excludes any submissions which were rejected. Unmetered connections are not required to go through the formal design approval process, therefore no volumes for unmetered design self-approval have been recorded.

4.19 Final Connection

4.19.1 The DNO shall set out the processes for facilitating the provision and registering of MPANs for premises that will connect to Connection Works that the DNO will adopt.

4.19.2 The DNO will provide this service in the same manner that it would provide to either a customer directly or its own business.

4.19.3 The ICP will be provided with any data or contact details of the DNO's MPAN creation team.

Within the Connection Offer letter, customers are advised that the MPAN (supply numbers) will be provided following acceptance. WPD do not have an MPAN creation team, they are generated, as required, by the local teams in discussion with the customer. This process is the same for both WPD and ICP delivered connections.

5.1 Accreditations

5.1.3 In all cases where NERS accreditation is not available DNOs will work with the scheme administrator to implement a scope change to cover the relevant activity consistent with the Relevant Objectives in section 2.3.

As identified in question 4.8, WPD is a member of NERSAP and the NERS Provider Forum to ensure scope changes are implemented to cover the relevant activity consistent with the Relevant Objectives in section 2.3.

5.2. Authorisations

5.2.2. Training and / or authorisations relating to G39 authorisations accepted by a given DNO shall be accepted by other DNOs

WPD do not authorise Lighting Authority Personnel.

STANDARD TECHNIQUE:OS6C “Co-ordination of Electrical Safety of Work on Street Furniture in the Vicinity of the WPD Distribution System” section 1.2 states:

1.2 In order to allow lighting authority personnel to operate WPD owned cut-outs, WPD require that the lighting authority ensures that their personnel are competent and equipped to do so in safety. It is therefore expected that lighting authorities shall train, certificate, audit and maintain a register of their personnel, who are required to operate WPD owned cut-outs, in accordance with G39/2.

WPD accept that this training can be provided by WPD, 3rd party training provider or other DNO without prejudice.

See Appendix M – OS6C_3

5.2.3. The following options for authorisation of ICP employees will be available, subject to agreement between the ICP and the DNO in consideration of the type of work being undertaken and in accordance with the specific DNO requirements for each option and published on its website:

- Option 1 - ICP authorisation of ICP Employees and Contractors
- Option 2 - DNO authorisation of ICP Employees
- Option 3 - Transfer of Control

Accredited ICPs are able to nominate which Option they will be complying with when working on the WPD network from the following table:

	Option 1	Option 2	Option 3	Option 4 Trial
	ICP Work to their own DSRs procedures and Policy. ICP Authorise their own Staff.	ICP works to WPD DSRs procedures and Policy. WPD Authorise ICP Staff.	WPD transfers control of a specific part of the distribution system to ICP control Only available with Option 1	ICP Senior Authorised Person switches to WPD DSRs procedures and policy. Work on 'Defined System' under ICP DSRs procedures and policy.

In addition during 16/17 as part of its ICE Connections Stakeholder programme, WPD trialed a new Option 4 in response to stakeholder feedback. Option 4 is for the ICP to work to WPD's DSRs for HV switching and to their own DSRs for carrying out the connection works. Following a successful trial with interested ICPs, WPD now offers the arrangement to all. WPD will submit a Modification Proposal to the CiC Code of Practice Panel inviting other DNOs and ICPs to consider the implementation of Option 4 as an industry agreed option for authorising ICP employees. The arrangements apply to high voltage (underground works only) and live low voltage mains and service connections for metered and unmetered connections (overhead and underground).

Any operatives who are required by the ICP to carry out physical work on WPD's distribution system must:

- hold a current NERS passport or an approved alternative with the relevant scopes and accreditation;
- be suitably competent and authorised by the ICP for the various stages of the intended works or activity under the ICP's DSRs and;
- have received basic health and safety training (i.e. avoidance of danger and risk assessment) and emergency first aid training including resuscitation.

In order to participate in this process the ICP shall either:

- be Fully Accredited, with an Framework Network Access and Adoption Agreement in place and the ICP operatives must have appropriate Lloyd's scopes and accreditations or;
- where the ICP holds only Partial Accreditation the ICP shall also be following the appropriate NERS process leading to Full Accreditation.

NEW During 2018/19, as part of its ICE Connections Stakeholder programme, WPD has amended Standard Technique ST:NC2L lift the restriction of overhead high voltage works.

See Appendix N – ST:NC2L_10

Table 3: Information on Authorisations

Activities	Option 1- ICP (Yes/No)	Option 2 – DNO (Yes/No)	Option 3 – Transfer of control (Yes/No)	Comments
LV Works	Yes	Yes	No	Live Jointing New Connections (LJNC) process
LV Operations	No	No	No	WPD shall: <ul style="list-style-type: none"> • Provide cable identification service • Install generation & back-feeds • Switch parallels
HV Works	Yes	Yes	Yes	As per HV operations
HV Operations	Yes	Yes	Yes	WPD shall: <ul style="list-style-type: none"> • Install generation and back-feeds • Switch parallels (unless under Option 4)
EHV Works	No	No	No	
EHV Operations	No	No	No	
Unmetered Works	Yes	Yes	No	Live Jointing New Connections (LJNC) process
Unmetered Operations	No	No	No	Cable identification service available from WPD

This information is available via a link to what operational activities an ICP is permitted to undertake on the WPD network on our website at www.westernpower.co.uk/Connections/Competition-in-Connections.aspx

6.1 Auditing

6.1.2. Auditing is undertaken to assess and validate the ability of ICPs to undertake specified NERS activities. ICPs Accredited under NERS will be subject to the audit provisions of NERS. DNOs are not required to, and will not, without reasonable cause, undertake additional audits of NERS accredited ICPs.

WPD can confirm that we would not, without reasonable cause, carry out audits to validate an ICP's ability to undertake specified activities where they have been accredited under NERS and subject to the audit provisions of NERS. As per Standard Technique NC2L, WPD will check to ensure the ICP holds appropriate accreditation under NERS, ask the ICP to nominate the DSR Code of Practice option they will be complying with when working on the WPD network and to provide a detailed Safety Management System (SMS) to WPD's Safety Team.

See Appendix N – NC2L_10

6.1.3. Where a DNO elects to provide its own ICP Accreditation (either where there is no accreditation available under NERS for particular activities or as an alternative to NERS in agreement with the ICP) the DNO shall undertake its own surveillance and assessment. In these cases the arrangements should be consistent with the arrangements used by the DNO for its own Connection Works and for its sub-contracted works and shall be not more onerous than that used by NERS.

WPD does not provide its own ICP Accreditation.

STANDARD TECHNIQUE: NC2L_9 "Relating to Independent Connection Provider (ICP) High and Low Voltage Connections under ICP or WPD DSRs" section 2.1 requires NERS or Partial NERS Accreditation is held by the ICP and has no option for WPD Accreditation.

2.1 Prior to WPD allowing an ICP to carry out any physical works WPD must ensure that the ICP:

- holds appropriate accreditation under the NERS;*
- has Partial Accreditation in WPD's distribution area or nationally applicable Full Accreditation.*

See Appendix N – NC2L_10

6.2. Inspection

6.2.1. DNOs shall be entitled to inspect ICP works. However, DNOs should be mindful of their obligations in respect of competition in Connections, and should therefore consider appointing independent inspectors to undertake this activity. In any case, such inspection should not unduly restrict or delay the Accredited ICP from undertaking work and must be no more onerous than the quality assurance regime used for the DNO's own Connections' activities.

6.2.3. If the DNO identifies a non-conformance, the DNO shall specify what the non-conformance is and set out the corrective actions that need to be undertaken. On completion of the corrective actions, the ICP shall advise the DNO and the DNO shall be entitled to revisit the site and carry out a further inspection.

Inspections, including those for network design, self-determined points of connection, design approval and physical on site works, are undertaken using the same inspection and monitoring regime for both ICP's and WPD's own connections business. The results are recorded in WPD's Crown database.

Inspections, where required, take place around the ICP's programme of works and, as such, the ICP will not be unduly restricted or delayed in undertaking their work. As the same regime is used for both ICP's and WPD's own connections business, the inspection of ICP's is no more onerous than the quality assurance regime used for WPD's own connections activities.

As described in 4.16.6, non-conformances are escalated in line with Standard Technique NC2M and NC2N, both of which are available on the WPD Technical Information website.

As part of its ICE Connections Stakeholder programme, WPD has improved the visibility and transparency of the inspection and monitoring regime. A monthly report is issued to ICPs detailing their own inspection performance including number of inspections carried out, number of passes and any failures incurred. During 2018/19 WPD developed a table of inspections which is anonymised and published on the WPD website, available to view here. This includes WPD's own performance for each of the four licence areas.

See Appendix J – NC2M_4 and Appendix L – NC2N

Table 4: Information on Inspections

	Number of Inspections Made	% of inspections made	Number of Connections made (exit points)	Comments
DNO	3371	60%	5143	The number of connections comprise only of connections energised by WPD between 01/04/19 and 31/03/20 on the enquiries for which inspections were completed.
ICPs	2259	40%	1092	The number of connections comprise only of adopted connections and IDNO exit points energised between 01/04/19 and 31/03/20 on the enquiries for which inspections were completed. It excludes connections downstream of an IDNO exit point.

7.2 Land Rights

7.2.1 The DNO will publish criteria which trigger the need for Land Rights relating to assets they will adopt or require access to, which shall be no more onerous than those it would seek for its own Connections activities.

UPDATED

WPD has updated its website and “Legal permissions and consents” webpage.

<http://www.westernpower.co.uk/connections-landing/legal-permissions-and-consents>

The page now includes drop downs to include descriptions, documents and advice on;

- What legal permissions and consents are
- Timescales for completing the legal permissions and consents process
- Links to relevant technical information for ICP’s and IDNO’s
- Contact details for the WPD Legal Team

The page now includes published guidance for landowners and ICPs to explain the process relating to Land Rights relating to assets adopted from ICPs.

This includes a typical process for completing WPD land owner legal permissions (where the ICP has agreed routes and terms with the landowners and is producing the legal plan).

Whether a customer seeks a direct quote from WPD or appoints an ICP, the main types of consents for connection needed are:-

- Landowner permissions
- Planning Permission or Development Consent
- Consents from other statutory bodies (e.g. environmental consents)

WPD will need land rights agreements in place prior to adopting the installed equipment and to cover future access and maintenance on the land. The WPD agreement would normally be one a WPD standard wayleaves or easements and would take effect once WPD adopts the works.

ICPs also need their own agreement with the landowner to carry out the works. The ICP agreement would be the contract between the ICP and the landowner for the installation stage and WPD are not normally party to that agreement.

WPD’s Technical Information website has a section on Legal Permissions and Consents which contains the relevant WPD Policies and Standard Techniques.

7.2.2 Subject to and in accordance with the terms of the agreed and applicable incorporated process, the IDNO will be able to negotiate on behalf of the DNO where IDNO and DNO dual use land right agreements are required so that they can secure the rights required for the connection and extension of the network.

WPD has adopted a process agreed with IDNOs to enable IDNOs to negotiate dual land use agreements, on behalf of the DNO.

The preferred method of securing land rights is by transferring the freehold from the developer or landowner but a long leasehold or sub-lease may sometimes be more appropriate. Where the IDNO is the majority asset holder they will be responsible for the accommodation and hold site duties under the ESQC Regulations. Under this scenario, for LV and 11kV sites, the IDNO will normally want to secure the rights for the substation under a bilateral lease/transfer agreement between themselves and the landowner. WPD's assets on the site and cables will be included in this agreement. WPD agreed a process with IDNO's to allow IDNO's to liaise directly with the land owner over the land transfer and to have control over the legal process for 11kV and low voltage connections only. Connections at 33kV and above will be the subject of a tri party agreement under guidance from the WPD Consents and Wayleaves team. The IDNO will acquire rights from the landowner by securing either a lease or transfer in respect of the substation and cabling, with WPD relying on the Contracts (Rights of Third Parties Act) 1999 to enforce the rights set out in the direct agreement between the IDNO and the landowner. The process to be adopted by the parties is based on one agreed with a major IDNO.

See Appendix I – NC6A_7

7.2.3 DNOs shall provide model standard Land Rights documentation for use by ICPs. The ICP may prepare the legal documentation for the Land Rights for the signature or authorisation of the DNO.

Information on Legal Permissions and Consents is published on WPD's website at <http://www.westernpower.co.uk/connections-landing/legal-permissions-and-consents>

This includes sample document templates for common WPD Deeds, Wayleaves and Lease agreements. Other specimen example documents can be provided on request.

WPD's Technical Information microsite section on Legal Permissions and Consents contains the relevant WPD Policies and Standard Techniques.

7.4 Adoption

7.4.2 The ICP will provide the DNO all as-laid drawings and test certificates as specified by the DNO. This information should be no more onerous than the information provided by the DNO's own Connections' activities.

The provision of records of the installed assets has been published on the WPD website under G81. The requirements are also set out in WPD's Standard Technique DO6A_4 which, alongside G81, is available on the technical information section of our website.

ICPs are required to be signatories to a Framework Network Access and Adoption Agreement (FNA&AA). Before adopting the assets WPD must be satisfied that the commissioning tests have been carried out satisfactorily and the ICP has provided a Notice of Completion.

Where the ICP is undertaking self-inspection they are required to submit an Audit Pack (see ICP Operating Manual page 15) which will include:

- Test results
- Schematic drawings

The ICPs are required to provide plans and recordings indicating the adopted assets which will be retained by the WPD Mapping Centre.

WPD will then issue a Completion Certificate acknowledging adoption of the assets, or a WPD Rejection Notice may be emailed to the ICP's nominated contact for any of the reasons specified in the ICP Operating Manual (page 16).

For WPD connections work, commissioning certificates and test results will be held locally. Schematic drawings and cable records will be retained by the WPD Mapping Centre.

See Appendix O – DO6A_4

10. Dispute Resolution

10.1. The DNO's complaints process will be used where any party considers that a DNO is not meeting their obligations under this code of practice. The complaints process will include appropriate levels of escalation within the DNO organisation. Each DNO shall publish their complaints resolution process on their website.

A CIC Connections complaints procedure has been published on the WPD website at www.westernpower.co.uk/connection-landing/information-for-icps-and-idnos/icp-complaints-procedure

This is specifically for use by any party who considers that WPD is not meeting its obligations under the CIC COP. It follows a similar internal escalation procedure to normal complaints. An online complaint request form is also provided.