

# Competition in Connections Code of Practice Reporting Requirements

Scottish Hydro Electric Power  
Distribution plc (SHEPD)  
and  
Southern Electric Power Distribution  
plc (SEPD)

30<sup>th</sup> September 2020

This document is the SLC52 Competition in Connections Code of Practice Reporting Requirements submission for 2020 on behalf of Scottish Hydro Electric Power Distribution plc (SHEPD) and Southern Electric Power Distribution plc (SEPD). Any difference in the two licensed areas will be clearly outlined in the applicable section of the report.

## 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.*

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.

## 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.*

The Connections process starts when a request for a Connection is made to SHEPD/SEPD via a postal, email, online or telephone application. All applications are initially registered on SHEPD/SEPD's project management system PROMIS.

As part of the application process, confirmation is issued to the customer once registration is complete. The confirmation issued by our registration team includes a hyperlink to our dedicated 'Connections – You Have a Choice' webpage ([www.ssen.co.uk/ConnectionsYouHaveaChoice/](http://www.ssen.co.uk/ConnectionsYouHaveaChoice/)), where our "You Have a Choice" factsheet can be downloaded. Please look at the supporting evidence to see an example of a confirmation email which is applicable to both SHEPD and SEPD.

By following the hyperlink to the 'Connections – You Have a Choice' webpage, in addition to outlining the choices available, it also directs the customer to SHEPD/SEPD's own Alternative Providers register, the Lloyd's Register website where NERS Accredited Independent Connection Providers (ICPs) can be found and the Ofgem website where a list of all Independent Distribution Network Operators (IDNOs) can be found.

This ensures that on receiving a Connection request, SHEPD/SEPD has provided the Customer with a detailed explanation of the competitive Connections market alongside contact details for Alternative Providers that may be available in our Distribution Services Area. The "You Have a Choice" factsheet is also provided to the Customer as part of the Quotation pack when issuing the final quote either via a website link inserted in the accompanying email or as an attachment.

### Supporting Evidence

- Connection Application Confirmation Email Redacted

*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.*

In addition to the information detailed in 4.3.2, we also provide clear and consistent information, which is signposted on our website for connection customers to access the competitive connections market, including:

- A dedicated "You Have a Choice" page explaining a customer's options on our website which includes a downloadable "You Have a Choice" factsheet ([www.ssen.co.uk/ConnectionsYouHaveaChoice/](http://www.ssen.co.uk/ConnectionsYouHaveaChoice/)).
- A dedicated "Alternative Provider Search" page with our Alternative Provider Register where ICPs, IDNOs and other parties involved in the Connections marketplace may register their contact details together with the areas they work in and assets they work on. This is supplemented by a direct link to the Lloyd's Register website for all NERS Accredited ICPs and a direct link to the Ofgem website for all IDNOs ([www.ssen.co.uk/AlternativeProviderSearch/](http://www.ssen.co.uk/AlternativeProviderSearch/)).

In addition to the above, we produce Connections Newsletters which are available to be downloaded from the website <https://www.ssen.co.uk/Connections/EngagementPublications/>. Copies of our Connections newsletter and most recent ICP/IDNO newsletter is enclosed as part of the supporting evidence.

### Supporting Evidence

- ICP\_IDNO Newsletter 2019

- SSEN ICE Newsletter Winter 2019
- SSEN ICE Newsletter Summer 2019

*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.*

When a customer applies for a Connection in any of the Metered Relevant Market Segments, in addition to providing information on choice, SHEPD/SEPD also provides the Customer with a fully Convertible Quotation. This includes all the relevant charges which are broken down into Contestable and Non-Contestable charges. This allows the Customer to accept the Quotation for SHEPD/SEPD to complete all the works involved in the Connection (i.e. 'All Works' offer), or just appoint SHEPD/SEPD to deliver the Non-Contestable elements of the project that only we are able to perform (i.e. 'Non-Contestable Works only' offer), allowing the Customer to appoint an ICP to complete the remainder.

As the Convertible Quotation is fully transferable, there are no additional costs or requirement to make an additional application and any queue management is based on the single application.

Where a customer applies for a Connection in any of the Unmetered Relevant Market Segments, as all tasks are already fully Contestable, the Connection Offer Acceptance is for 'All Works' only. This means if the Customer accepts the All Works quotation then SHEPD/SEPD will complete the entirety of the Contestable Works. However, the Unmetered Quotation includes an explanation on the option of choosing an alternative provider to carry out the entirety of the works. Please refer to the Unmetered Connections Quote Letter (example of Quote Letter 3) is enclosed as supporting evidence.

#### **Supporting Evidence**

- Connection Including Reinforcement Quote Letter Redacted (Example of Quote Letter 1)
- Connection Including Diversion Quote Letter Redacted (Example of Quote Letter 2)
- Unmetered Connections Quote Letter Redacted (Example of Quote Letter 3)

*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.*

As part of our Convertible Quotations, SHEPD/SEPD includes:

- The Point of Connection to our Distribution System;
- whether any reinforcement of the existing Distribution System is required; and
- whether part of the Distribution System needs to be diverted.

The Convertible Quotation that SHEPD/SEPD issues also contains a detailed breakdown of:

- The charges for the Non-Contestable Works;
- the charges for Contestable Works;
- the work and costs of providing the new Connection;
- the connection offer expenses; and
- a facility for the Customer to accept an 'All Works' offer or 'Non-Contestable only' offer to progress with an Alternative Provider. Also, when issuing the final Quotation, the "You Have a Choice" factsheet is provided to the Customer as part of the Quotation pack either via a website link inserted in the accompanying email or as an attachment.

#### **Supporting Evidence**

Please refer to enclosed examples as referred to in 4.3.4 of quotation letters 1 & 2 provided as supporting evidence of this.

#### ***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 charges for the Non-Contestable Works in SHEPD's/SEPD's Convertible Quotations are fully comparable across the Acceptance options. Should a Customer accept the 'All Works' option or the 'Non-Contestable Works only' option, the Non-Contestable costs are the same.

#### **Supporting Evidence**

Please refer to enclosed examples as referred to in 4.3.4 of quotation letters 1 & 2 provided as supporting evidence of this.

### **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.*

SHEPD/SEPD has published the circumstances and reasons why an Accredited ICP cannot undertake the assessment of the Point of Connection. The circumstances where an ICP cannot undertake the assessment of the Point of Connection are governed by the voltage of the proposed connection, size of local assets and type of connection to be made.

This information has been published on our secure website and includes a 'POC Self Identification Matrix' (SSEN Standard Design Matrices for POC Assessment) and a 'POC Self Identification and Self Design Approval Guidance' (POC Self Id and Self Design Approval Guidance).

Refer to screenshot No. 18 in enclosed supporting document "SEPD and SHEPD Website Information Screenshots": **SSEN website – 'Secure Documents' – 'POC Guidance Matrix' page.**

#### **Supporting Evidence**

- SSEN Standard Design Matrices for POC Assessment
- POC Self Id and Self Design Approval Guidance

- SEPD and SHEPD Website Information Screenshots

## 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 utilizing the technical competency of the ICP's design team (see section 4.10 below).*

SHEPD/SEPD has a dedicated secure ICP/IDNO Web-Portal on SSEN's website, normally available on a 24/7 basis, where information is available to enable ICPs to identify a Point of Connection via the Standard Design Matrix or through the DNO's standards and process utilising technical competency.

All of the following screenshots can be found in the enclosed supporting document "SEPD and SHEPD Website Information Screenshots"

Refer to screenshot No. 14 : **SSEN website – 'Competition in connections' page to access 'Secure documents' page**

Refer to screenshot No. 16: **SSEN website – 'Secure Documents' – 'Terms and Conditions' page.**

Refer to screenshot No. 17: **SSEN website – 'Secure Documents' – 'Alternative Provider Network Information' page.**

Refer to screenshot No. 18: **SSEN website – 'Secure Documents' – 'POC Guidance Matrix' page.**

### **Supporting Evidence**

- SSEN Standard Design Matrices for POC Assessment (POC Self Identification Matrix)
- POC Self Id and Self Design Approval Guidance
- SEPD and SHEPD Website Information Screenshots

*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.*

SHEPD/SEPD has made available to Alternative Providers the below information on an equivalent basis to that available to their own Connections Business:

All of the following screenshots can be found in the enclosed supporting document "SEPD and SHEPD Website Information Screenshots"

- Geographical network records showing the location, size and type of assets

Refer to screenshot No. 34: **SSEN website – ‘Secure Documents’ – ‘Network Geographical Information System (GIS)’ page.**

- 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

Refer to screenshot No. 40 : **SSEN website – ‘Secure Documents’ – ‘Network Rating and Loading Information’ page.**

Refer to screenshot No. 41: **SSEN website – ‘Secure Documents’ – ‘Network Rating and Loading Information’ – ‘South’ page.**

Refer to screenshot No. 42: **SSEN website – ‘Secure Documents’ – ‘Network Rating and Loading Information’ – ‘North’ page.**

- Relevant design standards and documents (e.g. the Energy Network Association's engineering recommendation G81)

Refer to screenshot No. 19: **SSEN website – ‘Secure Documents’ – ‘Design and Specification Documents’ page.**

Refer to screenshot No. 20: **SSEN website – ‘Secure Documents’ – ‘All G81 Documents’ page.**

Also refer to screenshots No. 21 to 27, 29 and 32 to 33 which show all our design standards and specifications available to Alternative Providers on our secure website.

- Asset sizes and ratings

Refer to screenshot No. 40: **SSEN website – ‘Secure Documents’ – ‘Network Rating and Loading’ page.**

Refer to screenshot No. 41: **SSEN website – ‘Secure Documents’ – ‘Network Rating and Loading’ – ‘South’ page.**

Refer to screenshot No. 42: **SSEN website – ‘Secure Documents’ – ‘Network Rating and Loading’ – ‘North’ page.**

- Network operational diagrams

Refer to screenshot No. 36: **SSEN website – ‘Secure Documents’ – ‘HV Network Schematics’ page.**

Refer to screenshot No. 37: **SSEN website – ‘Secure Documents’ – ‘South Network Schematics’ page.**

Refer to screenshot No. 38: **SSEN website – ‘Secure Documents’ – ‘North Network Schematics’ page.**

#### **Supporting Evidence**

- SEPD and SHEPD Website Information Screenshots

## 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.*

SHEPD/SEPD is an active member of the NERS Advisory Panel (NERSAP), which has actively reviewed and assessed the Competition in Connections Code of Practice (CiCCoP) for additions to or omissions from the NERS scheme.

Reviewing the NERS scheme and NERS Requirements document remains a standing task for NERSAP as detailed in the enclosed minutes.

The NERS Requirements document has been revised and the latest version was published on Lloyd's Register website in November 2018. This revised document is enclosed as supporting evidence.

The 'NERS Strategy Working Group' (which is a sub-group of NERSAP) has been created to carry out a strategic review of the NERS scheme and consider if it is fit for purpose. This working group is still in place and SHEPD/SEPD are represented.

SHEPD/SEPD also engage actively in the process of NERS scope review as part of the CiCCoP Panel, with an annual review of scope being a standing item on the panel agenda. The NERSAP secretary is invited to attend the CiCCoP Panel as an observer.

### Supporting Evidence

- NERSAP Minutes 05112019
- NERSAP Minutes 30072019
- NERS Requirements Doc V.7 November 18

## 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.*

Some Point of Connection designs may be determined using a Standard Design Matrix. To facilitate this, an up-to-date Standard Design Matrix is published on the secure website.

This matrix may be used to identify a Point of Connection.

### Supporting Evidence

- SSEN Standard Design Matrices for POC Assessment.xlsx (POC Self Identification Matrix)
- POC Self Id and Self Design Approval Guidance Note

*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.*

All of the following screenshots can be found in the enclosed supporting document "SEPD and SHEPD Website Information Screenshots"

The Standard Design Matrix includes details of the process to be applied to identify a Point of Connection including the process in assessing load and capacity data.

Refer to screenshot No. 18: **SSEN website – 'Secure Documents' – 'POC Guidance Matrix' page.**

This Matrix may be used, in conjunction with the capacity data and geographical network data; also available to Alternative Providers via SSEN's dedicated secure Web-Portal.

- Capacity data

Refer to screenshot No. 40: **SSEN website – 'Secure Documents' – 'Network Rating and Loading' page.**

Refer to screenshot No. 41: **SSEN website – 'Secure Documents' – 'Network Rating and Loading' – 'South' page.**

Refer to screenshot No. 42: **SSEN website – 'Secure Documents' – 'Network Rating and Loading' – 'North' page.**

- Geographical network data

Refer to screenshot No. 34: **SSEN website – 'Secure Documents' – 'Network Geographical Information System (GIS)' page.**

Refer to screenshot No. 35: **SSEN website – 'Secure Documents' – 'Network GIS Login' – page.**

#### **Supporting Evidence**

- SSEN Standard Design Matrices for POC Assessment (POC Self Identification Matrix)
- POC Self Id and Self Design Approval Guidance
- SEPD and SHEPD Website Information Screenshots

## **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.***

In order to facilitate the exchange of information required to determine the Point of Connection, SHEPD/SEPD continues to use the online process. This allows ICPs and IDNOs to provide information to SHEPD/SEPD during the following key stages:

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

Using this process, SHEPD/SEPD has been able to provide the ICP with all relevant information required, either online or as a consequence of requesting this via the key stages above, including:

- If EHV reinforcement is required;
- any relevant rebate or cost apportioned second comer costs under ECCR;
- contracted but not connected load that may be required to be included in an ICP's assessment and design;
- other known network constraints that may impinge on the connection;
- any planned but not yet completed reinforcement together with its timescale; and
- any interactivity with the connection, as it occurs.

Four ICP/IDNO engagement events were planned to be held during this 2019-20 reporting year across SHEPD and SEPD but the SHEPD event in February 2020 was cancelled due to severe weather. It was not rescheduled due to the ongoing COVID situation. The presentation slides are enclosed with the supporting evidence.

Refer to screenshot No. 5 in enclosed supporting document "SEPD and SHEPD Website Information Screenshots" which shows where the ICP/IDNO Newsletters can be found.

**Supporting Evidence**

- ICP/IDNO Newsletter 2019
- SEPD and SHEPD Website Information Screenshots
- ICP IDNO engagement event and forum 10092019
- CinC Forum Minutes 100919
- ICP IDNO event and forum – 06022020
- SPEN SSEN ICE IDNO Event 09102019
- Project Tracking Workshop Slides 29082019

**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		
DG HVEHV		
UMS LA		
UMS Other		
UMS PFI		

SHEPD/SEPD has published the circumstances where an ICP/IDNO can self determine their own POC utilising the common template.

Refer to 'POC Self Identification and Self Design Approval Guidance' (REF-NET-COM-001\_POC Self Identification and Self Design Approval Guidance Note.pdf).

Refer to screenshot No. 18 in enclosed supporting document "SEPD and SHEPD Website Information Screenshots": **SSEN website – 'Secure Documents' – 'POC Guidance Matrix' page.**

Table 1 below is extracted from the guidance note published on SSEN's dedicated secure Web-Portal.

<b>Table 1 – When an ICP can self determine their own POC</b>		
<b>Market Segment</b>	<b>Self determination available (Yes/No)</b>	<b>Comment</b>
<b>LV demand</b>	Yes	
<b>HV demand</b>	Yes	
<b>HVEHV demand</b>	No	
<b>EHV132 demand</b>	No	
<b>DG LV</b>	No	
<b>DG HVEHV</b>	No	
<b>UMS LA</b>	Yes	
<b>UMS Other</b>	Yes	
<b>UMS PFI</b>	Yes	

**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		

SHEPD/SEPD has published the criteria by which an ICP/IDNO can determine their own POC utilising the common template.

Refer to ‘POC Self Identification and Self Design Approval Guidance’ (REF-NET-COM-001\_POC Self Identification and Self Design Approval Guidance Note.pdf).

Refer to screenshot No. 18 in enclosed supporting document “SEPD and SHEPD Website Information Screenshots”: **SSEN website – ‘Secure Documents’ – ‘POC Guidance Matrix’ page.** Table 2 below is extracted from the guidance note published on SSEN’s dedicated secure Web-Portal.

**Table 2 – Criteria by which an ICP can determine their own POC**

Criteria	Measurement	Comment
<b>connection capacity</b>	Up to 1MVA	Dependent on POC voltage
<b>distance to substation</b>	N/A	Design assessment using suitable analysis tools required for any extension greater than 10m.
<b>service cable length</b>	Service length <30m	Longer lengths require design assessment using suitable analysis tools.
<b>transformer capacity</b>	Transformer capacity >50kVA	Existing Transformer Load assessment required where connection is greater than 23kVA (ADMD).
<b>asset types excluded</b>	Connections involving EHV assets. Distributed Generation connections.	

The facility for all ICPs to undertake their own POC determination for all LV demand and HV demand projects has existed since November 2015. Most ICPs continue to request that we carry out this task. Table 1 below shows information on self determination of Points of Connections, duplicated for both SHEPD and SEPD.

**Table 1: Information on Self Determination of Points of Connection – SHEPD Licensed Area**

Market Segment	Self Determination Available (Yes/No)	Comment	Number of DNO Quotes Issued	Number of SLC15 Quotes Issued	Number of Self Determined by Standard Design Matrix	Number of Self Determined by Technical Competence
LV demand	Yes		885	83	0	0
HV demand	Yes		1717	77	0	0
HVEHV demand	No		139	12	0	0
EHV132 demand	No		4	6	0	0
DG LV	No		267	52	0	0
DG HVEHV	No		247	58	0	0
UMS LA	Yes	POC Self Determination process not required for Unmetered Connections but ICPs determine their own POC for all Unmetered Connections.	382	1	0	0
UMS Other	Yes	POC Self Determination process not required for Unmetered Connections but ICPs determine their own POC for all Unmetered Connections.	381	5	0	0
UMS PFI *	Yes	POC Self Determination process not required for Unmetered Connections but ICPs determine their own POC for all Unmetered Connections.	0	0	0	0

**\*Note:** Currently, there are no Unmetered Private Finance Initiatives in the North of Scotland.

**Table 1: Information on Self Determination of Points of Connection – SEPD Licensed Area**

Market Segment	Self Determination Available (Yes/No)	Comment	Number of DNO Quotes Issued	Number of SLC15 Quotes Issued	Number of Self Determined by Standard Design Matrix	Number of Self Determined by Technical Competence
LV demand	Yes		3216	539	0	0
HV demand	Yes		2906	938	0	1
HVEHV demand	No		63	56	0	0
EHV132 demand	No		26	20	0	0
DG LV	No		1085	7	0	0
DG HVEHV	No		229	56	0	0
UMS LA	Yes	POC Self Determination process not required for Unmetered Connections but ICPs determine their own POC for all Unmetered Connections.	172	44	0	0
UMS Other	Yes	POC Self Determination process not required for Unmetered Connections but ICPs determine their own POC for all Unmetered Connections.	1339	67	0	0
UMS PFI	Yes	POC Self Determination process not required for Unmetered Connections but ICPs determine their own POC for all Unmetered Connections.	1	6	0	0

## 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.*

SHEPD/SEPD sets out details of any reasonable requirements on the SSEN website including their design standards and specifications, such as planning and design G81 documents.

There are links to the relevant design standards and specifications available on SSEN's dedicated secure ICP/IDNO Web-Portal.

Refer to screenshots No. 21 to 27, 29 and 32 to 33 in enclosed supporting document "SEPD and SHEPD Website Information Screenshots" which show all our design standards and specifications available to Alternative Providers on our secure website.

### **Supporting Evidence**

- SEPD and SHEPD Website Information Screenshots

*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.*

SHEPD/SEPD does not require any additional boundary equipment between its and an IDNO's network at LV. SHEPD/SEPD retains the requirement for boundary equipment at higher voltages in compliance with the Distribution Code.

## 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

SHEPD/SEPD has published the standard design approval tables utilising the common template.

Refer to 'POC Self Identification and Self Design Approval Guidance' (REF-NET-COM-001\_POC Self Identification and Self Design Approval Guidance Note.pdf).

Refer to screenshot No. 18 in enclosed supporting document "SEPD and SHEPD Website Information Screenshots": **SSEN website – 'Secure Documents' – 'POC Guidance Matrix' page.**

Tables 3 and 4 below are extracted from the guidance note published on SSEN's dedicated secure ICP/IDNO Web-Portal.

**Table 3 – The market segments where the ICP is able to self-approve its designs**

Relevant Market Segment	Self-approval of designs available (Yes/No)	Comment
LV demand	Yes	
HV demand	Yes	
HV/EHV demand	No	
EHV/132kV demand	No	
DG LV	No	
DG HV/EHV	No	
UMS LA	Yes	
UMS Other	Yes	
UMS PFI	Yes	

**Table 4 – Qualifying criteria that will apply to allow an ICP to move between the different levels of design approval**

Level	Criteria
1	If ICP has suitable NERs accreditation, the ICP is fully able to self-approve contestable designs
2	N/A
3	N/A
etc.	<i>ICP fully able to self-approve contestable designs*</i>

\*If applicable

*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.*

As detailed in 4.16.3 above, SHEPD/SEPD only requires that an ICP is suitably NERS Accredited for them to undertake their own design approval for all LV and HV Demand projects and unmetered projects.

However, where an ICP specifically requests that SHEPD/SEPD approves their design, they may request this on a job by job basis. Where this is requested, this is carried out within the required timescale as set out in our licence.

The facility for all ICPs to undertake their own design approval for all LV demand and HV demand projects has existed since November 2015. Although many ICPs initially continued to request that we carry this task out, there are a number of ICPs opting to self-approve their design, particularly in the SEPD area.

Refer to the following Table 2 in this report which shows information on self approval of designs, duplicated for both SHEPD and SEPD.

#### **Supporting Evidence**

- POC Self Id and Self Design Approval Guidance
- SEPD and SHEPD Website Information Screenshots

*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 design approval for the Contestable Works is to be undertaken by an Accredited ICP, SHEPD/SEPD has in place a process for ICPs to submit their design for information.

Where, during the review of the design submitted for information, any non-conformance with design standards or issues with POCs are identified, SHEPD/SEPD has in place a process to inform the ICP/IDNO by email of any non-conformity together with the corrective actions required. The ICP does not need to wait for the feedback on our inspection of their design. The inspection is no more onerous than required of our own business.

#### **Supporting Evidence**

- SEPD and SHEPD Website Information Screenshots

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

SHEPD/SEPD continues to engage with ICPs to resolve issues should any concerns arise around competency. Should this not resolve matters, SHEPD/SEPD will escalate to a senior manager

within SHEPD/SEPD who will engage with the ICP concerned at a more senior level to address issues.

Ultimately, SHEPD/SEPD will inform the NERS Accreditation Body of any concerns with a specific ICP. SHEPD/SEPD would only take this step when all other avenues have been exhausted.

Additionally, SHEPD/SEPD also works closely with the NERS Accreditation Body on an ongoing basis identifying and reinforcing best performance by individual ICPs.

**Table 2: Information on Self Approval of Designs – SHEPD Licensed Area**

Market Segment	Self Approval Available (Yes/No)	Comment	Number of SLC15 Designs Approved	Number of Self Approved Designs
LV demand	Yes		19	2
HV demand	Yes		19	3
HVEHV demand	No		3	0
EHV132 demand	No		4	0
DG LV	No		11	0
DG HVEHV	No		14	0
UMS LA	Yes	Self Design Approval process not required for Unmetered Connections but ICPs approve their own design for all Unmetered Connections.	0	0
UMS Other	Yes	Self Design Approval process not required for Unmetered Connections but ICPs approve their own design for all Unmetered Connections.	0	0
UMS PFI *	Yes	Self Design Approval process not required for Unmetered Connections but ICPs approve their own design for all Unmetered Connections.	0	0

**\*Note:** Currently, there are no Unmetered Private Finance Initiatives in the North of Scotland.

**Table 2: Information on Self Approval of Designs – SEPD Licensed Area**

Market Segment	Self Approval Available (Yes/No)	Comment	Number of SLC15 Designs Approved	Number of Self Approved Designs
LV demand	Yes		108	94
HV demand	Yes		93	50
HVEHV demand	No		9	0
EHV132 demand	No		1	0
DG LV	No		0	0
DG HVEHV	No		2	0
UMS LA	Yes	Self Design Approval process not required for Unmetered Connections but ICPs approve their own design for all Unmetered Connections.	0	0
UMS Other	Yes	Self Design Approval process not required for Unmetered Connections but ICPs approve their own design for all Unmetered Connections.	0	0
UMS PFI	Yes	Self Design Approval process not required for Unmetered Connections but ICPs approve their own design for all Unmetered Connections.	0	0

## 4.18 Final Connection

*4.18.1 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.*

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

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

SHEPD/SEPD has an established process of registering MPANs associated with all new connections.

SHEPD/SEPD provides the service of facilitating and registering MPANs to an ICP in the same manner that it provides it to a customer directly or its own Connections business.

This process is common across all market participants.

Specific MPAN process guides have been created to cover different market segments, including a dedicated MPAN process guide for ICPs and a guide for requesting an additional MPAN, both are enclosed with the supporting evidence. These MPAN process guides are published on SSEN's website on its dedicated MPAN page, which also contains the MPAN creation team's contact details.

Refer to screenshots No. 1 and 2 in enclosed supporting document "SEPD and SHEPD Website Information Screenshots": **SSEN website – 'MPAN' page.**

### Supporting Evidence

- ICP MPAN process
- Additional MPAN Process
- SEPD and SHEPD Website Information Screenshots

## 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.*

SHEPD/SEPD is an active member of the NERS Advisory Panel (NERSAP), which has actively reviewed and assessed the Competition in Connections Code of Practice (CiCCoP) for additions to or omissions from the NERS scheme. SHEPD/SEPD are committed to continuing this role; working closely with the NERS Accreditation Body should the scope change or any relevant activities be identified.

Reviewing the NERS scheme and NERS Requirements document remains a standing task for NERSAP as detailed in the enclosed minutes.

The latest NERS Requirements document has been enclosed as supporting evidence.

The 'NERS Strategy Working Group' (which is a sub-group of NERSAP) has been created to carry out a strategic review of the NERS scheme and consider if it is fit for purpose. This working group is still in place and SHEPD/SEPD are represented.

NERSAP is also involved with the National Skills Academy for Power (NSAP) via the 'Designer Competency Working Group' (which is another sub-group of NERSAP)

SHEPD/SEPD engage actively in the process of NERS scope review as part of the CiCCoP Panel, with an annual review of scope being a standing item on the panel agenda. The NERSAP secretary is invited as an observer to the CiCCoP Panel.

#### **Supporting Evidence**

- NERSAP Minutes 05112019
- NERSAP Minutes 30072019
- NERS Requirements Doc V.7 November 18

## **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***

SHEPD/SEPD recognises and accepts training and/or authorisation given by any other DNO regarding G39 and other competencies such as removing cut-out fuses etc.

The CiCCoP Panel had previously created a sub-group (called 'G39 Self-Authorisation Working Group') following a CiCCoP modification request raised by the Unmetered Customer Group (UCCG). Each DNO now has in place a process that achieves the modification request and so the modification from UCCG has therefore been removed. SSEN 'G39 Authorisation - SSEN Statement' document is published on our website and can be viewed at [www.ssen.co.uk/UnmeteredSupplies](http://www.ssen.co.uk/UnmeteredSupplies)

#### **Supporting Evidence**

- CiC\_CoP Minutes 10012020
- CiC\_CoP Minutes 14102019
- CiC\_CoP Minutes 15072019
- CiC\_CoP Minutes 17052019
- G39 Authorisation - SSEN Statement

### ***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*

SHEPD/SEPD facilitates all three authorisation Options dependent on the ICP/IDNO's preference. SHEPD/SEPD offer the facility for an ICP to be authorised under SHEPD/SEPD's Operational Safety Rules (OSRs) and will also recognise an ICP's own Distribution Safety Rules (DSRs).

This approach is recognised and documented. The documentation is provided for all interested parties on SSEN's dedicated secure ICP/IDNO Web-Portal.

Refer to screenshot No. 26 in enclosed supporting document “SEPD and SHEPD Website Information Screenshots”: **SSEN website – ‘Secure Documents’ – ‘Operational Documents’ page.**

Refer to screenshot No. 5 in enclosed supporting document “SEPD and SHEPD\_Website Information\_Screenshots” which shows some information regarding the Model Distribution Safety Rules (MDSRs) and where ICPs/IDNOs can send their own DSRs via email address for review.

Table 3 below shows information on authorisations, for both SHEPD and SEPD.

#### **Supporting Evidence**

- SEPD and SHEPD Website Information Screenshots

**Table 3: Information on Authorisations – SHEPD and SEPD Licensed Areas**

Activities	Option 1- ICP (Yes/No)	Option 2 – DNO (Yes/No)	Option 3 – Transfer of control (Yes/No)	Comments
LV Works	Yes	Yes	Yes	
LV Operations	Yes	Yes	Yes	
HV Works	Yes	Yes	Yes	
HV Operations	Yes	Yes	Yes	
EHV Works	Yes	Yes	Yes	
EHV Operations	Yes	Yes	Yes	
Unmetered Works	Yes	Yes	Yes	
Unmetered Operations	Yes	Yes	Yes	

## 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.*

SHEPD/SEPD has not carried out any audits on NERS Accredited ICPs working in our Distribution Service Area. All audits are now solely carried out by Lloyd's Register (current NERS Accreditation Body) as part of the NERS process.

*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.*

SHEPD/SEPD has chosen not to provide its own ICP Accreditation. SHEPD/SEPD believes that all areas are available for accreditation under NERS. SHEPD/SEPD does not believe that it would be appropriate or efficient to establish an alternative to NERS accreditation.

## 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.*

SHEPD/SEPD has a dedicated site inspections team under a separate internal business unit to carry out all inspections on contestable works, be they carried out by an Alternative Provider or SHEPD/SEPD's own Connections business.

In this way inspection results, records and resolutions are managed in a consistent and transparent manner.

It should be noted that, as inspections relate to projects not exit points, there is no direct correlation between number of inspections and number of exit points. Projects may include many or few exit points. An IDNO project for example commonly involves a single exit point.

Table 4 below shows information on inspections, duplicated for both SHEPD and SEPD.

**Table 4: Information on Inspections – SHEPD Licensed Area**

	<b>Number of Inspections Made</b>	<b>% of inspections made*</b>	<b>Number of Connections made (exit points)**</b>	<b>Comments</b>
DNO	923	82.85%	6615	
ICPs	191	17.15%	387	

**Table 4: Information on Inspections – SEPD Licensed Area**

	<b>Number of Inspections Made</b>	<b>% of inspections made*</b>	<b>Number of Connections made (exit points)**</b>	<b>Comments</b>
DNO	1154	83.32%	46845	
ICPs	231	16.68%	6180	

**Comments:**

\* The figures for ‘% of inspections made’ are calculated as follows:

- **‘% of inspections made’ – ‘DNO’:**  
= Number of Inspections Made (DNO) ÷ Total Number of Inspections Made (DNO+ICPs) x 100
- **‘% of inspections made’ – ‘ICPs’:**  
= Number of Inspections Made (ICPs) ÷ Total Number of Inspections Made (DNO+ICPs) x 100

\*\* The figures for ‘Number of Connections made (exit points)’ are composed of the following:

- **Number of Connections made (exit points) – ‘DNO’**  
= Total number of metered MPANs which have been connected/energised by DNO + Total number of unmetered tasks carried by DNO (i.e. new connections, transfers and disconnections) which have impacted the exit points
- **‘Number of Connections made (exit points)’ – ‘ICPs’**  
= Total number of metered MPANs which have been connected/energised for/by ICPs + Total number of Point of Connections (POCs) which have been connected/energised for/by ICPs (if ‘Total number of metered MPANs which have been connected/energised’ for/by ICPs is unknown) + Total number of unmetered tasks carried out by ICPs (i.e. new connections, transfers and disconnections) which have impacted the exit points

## 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.*

SHEPD/SEPD publishes full details of the criteria which trigger any land rights required where Alternative Providers are involved in the acquiring of rights for the installation of distribution assets. This approach is no more onerous than it would be for our own connections' activities.

The land rights required are set out in the document "Land rights requirements relating to assets to be installed or adopted by SEPD or SHEPD for new connections", which is published on SSEN's website ([www.ssen.co.uk/LandRights/](http://www.ssen.co.uk/LandRights/)).

Three dedicated "Wayleaves" guides are published on SSEN's website, one for Scotland another for England and a third guide specifically for Independent Connection Providers undertaking wayleaves and consenting activities. These guides are included as part of the supporting evidence.

All of the following screenshots can be found in the enclosed supporting document "SEPD and SHEPD Website Information Screenshots"

Refer to screenshot No. 7: **SSEN website – 'Competition in Connections reporting and applications' – 'Land Rights Requirements and Documentation' page.**

Refer to screenshot No. 8 **SSEN website – 'Competition in Connections reporting and applications – 'Land Rights Requirements and Documentation' page to access 'SEPD Land Rights Documents'.**

Refer to screenshot No. 9: **SSEN website – 'Competition in Connections reporting and applications – 'Land Rights Requirements and Documentation' page to access 'SHEPD Land Rights Documents'.**

Refer to screenshot No. 5 which shows where the ICP/IDNO Newsletters can be found.

### **Supporting Evidence**

- Land Rights Requirements August 2016 (Land rights requirements relating to assets to be installed or adopted by SEPD or SHEPD for new connections)
- SHEPD Wayleaves Scotland v4 2018
- SEPD Wayleaves Southern v4 2018
- Wayleave and Consent Guide for ICPs
- SEPD and SHEPD Website Information Screenshots

*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.*

SEPD have in place an incorporated process which allows an IDNO to negotiate on behalf of SEPD for dual use land right agreements as required.

As a result of the structure of the conveyancing system in Scotland, the incorporated process is not applicable for SHEPD. IDNOs can utilise the lease / sub-lease templates published on the website.

### Supporting Evidence

- Land Rights Requirements August 2016 (Land rights requirements relating to assets to be installed or adopted by SEPD or SHEPD for new connections)

*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.*

SHEPD/SEPD has provided a full suite of model standard Land Rights documentation for use by ICPs/IDNOs. Using these, an Alternative Provider may prepare the legal documentation for the Land Rights to be signed by SHEPD/SEPD. These documents are published on SSEN's website.

All of the following screenshots can be found in the enclosed supporting document "SEPD and SHEPD Website Information Screenshots"

Refer to screenshot No. 7: **SSEN website – 'Competition in Connections reporting and applications – 'Land Rights Requirements and Documentation' page.**

Refer to screenshot No. 8: **SSEN website – 'Competition in Connections reporting and applications – 'Land Rights Requirements and Documentation' page to access 'SEPD Land Rights Documents'.**

Refer to screenshot No. 9: **SSEN website – 'Competition in Connections reporting and applications – 'Land Rights Requirements and Documentation' page to access 'SHEPD Land Rights Documents'.**

### Supporting Evidence

- SEPD and SHEPD Website Information Screenshots

## 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.*

SHEPD/SEPD's as-laid drawings, commissioning and test certificates, final records, processes and procedures are common across both our own Connections activities and those carried out by Alternative Providers.

The common process documents, updates of information and data, are available to both SHEPD/SEPD's own Connections business and Alternative Providers via SSEN's dedicated secure ICP/IDNO Web-Portal, as part of the G81 documentation.

All of the following screenshots can be found in the enclosed supporting document "SEPD and SHEPD Website Information Screenshots"

Refer to screenshot No. 10: **SSEN website – 'Competition in Connections' page to access 'Network Adoption Process'.**

Refer to screenshot No. 14: **SSEN website – 'Competition in Connections' page to access 'Secure Documents'.**

## Supporting Evidence

- SSEN Network Adoption Process Flowchart (Metered)
- SEPD and SHEPD Website Information Screenshots

## 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.*

SHEPD/SEPD are committed to offering our customers the very best in customer service and we encourage feedback, especially if things have gone wrong. SEPD and SHEPD have a common complaint handling process which is applicable to all types of complaint.

All our staff are trained to offer the best possible customer service and do their utmost to help the customer. If they need to involve their manager, they will do so to ensure the matter is resolved as quickly as possible. As part of the complaint handling process, we will offer the customer a full explanation. We will also take remedial action and may award compensation in appropriate circumstances.

In addition to the above, we also provide consistent clear, well sign-posted and robust information on our website regarding complaints including:

All of the following screenshots can be found in the enclosed supporting document "SEPD and SHEPD Website Information Screenshots"

- A dedicated complaints' page

Refer to screenshot No. 47: **SSEN website – 'Customer support and Community home' – 'Complaints' page.**

- A clear concise guide to our complaints process

Refer to screenshot No. 48: **SSEN website – 'Complaints' page to access 'Complaints Handling Process – Distribution'.**

- A dedicated compliments page for when things go right

Refer to screenshot No. 50: **SSEN website – 'Customer support and Community home' – 'Compliments' page.**

- Clear signposting from our Contact Us page

Refer to screenshot No. 51: **SSEN website – 'Contact us' page.**

### **Supporting Evidence**

- Complaints Handling Process August 2018
- SEPD and SHEPD Website Information Screenshots