

# Competition in Connections Code of Practice Annual Report

1st April 2022 to 31st March 2023

#### 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. 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
V1.0	22/09/2023	Final version.

#### 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.

On receiving a connection request, all our confirmation letters and subsequently issued convertible quotations contain the following standard paragraph: "We actively promote competition in connections and are committed to maintaining an environment in which ICPs can compete freely and fairly to undertake contestable work. We are, therefore, providing you with two alternative quotations. One quotation is for us to carry out both the contestable works and the non-contestable works and one quotation is for us to carry out the non-contestable works only. You are able to appoint an ICP to carry out the contestable work. Consequently, if you wish to obtain quotations from ICPs, you will then be able to easily compare the ICPs' prices for the contestable work with ours. A list of ICPs operating in our area can be found on our website at: www.northernpowergrid.com/alternative-providers.".

This link to our alternative providers register allows a customer to access a list of ICPs who are active within our license areas along with direct contact details for each ICP.

Additionally, and following direct ICP feedback, we have taken the promotion of competition one stage further in order to promote competition at source before the connection application is made. We achieved this by updating our web-based applications system to make customers aware of the choices they have when it comes to their new connections prior to them submitting an application to us.

Finally, all of our external connections-related email communications contain a standard auto-signature that highlights competition in connections and provides a direct link to our website where customers can find further, comprehensive information relating to competition in connections.

# 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.

Northern Powergrid has a dedicated competition in connections webpage (<u>www.northernpowergrid.com/competition-in-connections</u>). This dedicated webpage contains a comprehensive overview of the competitive environment and the alternative options available to customers when it comes to their new connection.

This page also provides a direct link to our own alternative providers register (<u>www.northernpowergrid.com/alternative-providers</u>) where a customer can access a list of active ICPs within our license areas. That list is displayed in randomised order each time the page is loaded and provides contact details for each ICP, so effectively allowing customers to shop around when it comes to their new connection without appearing to suggest any priority preference for any particular ICP. In addition, we also provide a link to the NERs website where an exhaustive list of ICPs can be found.

Finally, this page also holds a number of useful documents that provide further detail on competition in connections.

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.

All requests made under Section 16 of the Electricity Act 1989, where the connection work falls within the Relevant Market Segments (RMS) applicable to competition in connections, receive a fully transferable and convertible quotation. The quotation contains two separate acceptance forms which enables the customer to choose to have Northern Powergrid complete both the contestable and non-contestable works or for an ICP to carry out the contestable work with Northern Powergrid carrying out the non-contestable work only.

This excludes unmetered quotations where the work is fully contestable. Our quotations for these unmetered connections advise the customer that an ICP can carry out all of the contestable connections work, if the customer so wishes.

#### 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.

All of our convertible quotations are issued with a geographical plan indicating the proposed Point of Connection location on our existing distribution network. Both the contestable and non-contestable works option and the non-contestable works only option contain information detailing the works to be undertaken for each of those options. This includes a section covering the replacement of system assets (reinforcement works) where applicable.

In addition, any required diversions are identified in the common quotation details with further, actual details of the work to be undertaken being provided within both the contestable and non-contestable works option and the non-contestable works only option of the convertible quotation, again where applicable.

The costs for both options are broken down by work category and split into separate contestable and non-contestable elements in a single table.

These quotations are fully convertible and have separate acceptance forms allowing a customer to decide which option to take forward. Within the non-contestable works only option, we make it clear that the customer will need to appoint a suitably accredited ICP to undertake the contestable elements of the work, if the customer chooses to accept the non-contestable works only option.

Furthermore, our convertible quotations provide further details about contestable and noncontestable works along with a link to our alternative providers register which allows customers to shop around when it comes to their new connection. 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.

Our convertible quotations contain one price for the non-contestable works only, which is applicable irrespective of whether an ICP or Northern Powergrid undertakes the contestable works. Consequently, the price for the non-contestable works is identical regardless of whether the customer chooses to accept the non-contestable works only option or the contestable and non-contestable works option.

## 4.5 Determining whether an ICP can undertake assessment of the POINT OF CONNECTION

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.

Information relating to the circumstances where an ICP can self-determine a Point of Connection is published on our dedicated competition in connections webpage (<u>ICP Self-Select Point of Connection limits, Design Considerations and ICP Design Approval Requirements - IMP/001/010/001</u>). This document also provides guidance on the assessments required to assess the suitability of a Point of Connection.

We have also published our standard design matrix rules <u>IMP/001/107</u>, which have been in effect since November 2018, when changes were made related to Low Carbon Technologies ("LCTs") and Electric Vehicle charging points. The document also contains links to our equivalent mains cable length spreadsheets which are available via our website to assist ICPs in assessing a Point of Connection on a network with mixed cable types.

#### 4.6 DNO Input Services where the ICP determines the POINT OF CONNECTION

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 sections 4.10, 4.12 and 4.15 below).* 

We have provided ICPs with access to asset information and data through a variety of methods as set out in 4.6.2 below.

In addition, we have undertaken and continue to undertake a programme of engagement with ICPs to ensure all ICPs are satisfied with our approach to the provision of information/data. The information is made available to an ICP on a 24/7 basis via direct access to our systems, where current systems allow. Alternatively, information is available upon request from our dedicated Connections Input Services team in a timeframe stipulated in the form of a Service Level Agreement.

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.

We have provided ICPs with access to asset information and data through a variety of methods. These include:

- Distribution network records via a download and VPN facility available 24 hours a day, seven days a week;
- Asset attribute data;
- Secure access to asset records via a dedicated ICP/IDNO web interface portal;
- Access to the Long Term Development Statements via our website;
- Data being provided within two working days, for more complex enquiries;
- 11kV half-hourly demand data provided via remote access to allow ICPs to self serve where they require this information;
- Planned network reinforcement and asset replacement data being available via our website;
- Generation availability data being available via our website;
- Published cable and overhead line ratings along with associated full codes of practice for cable (<u>IMP/001/013</u>) and overhead line (<u>IMP/001/011</u>) ratings; and
- Undertaking a programme of engagement with ICPs to ensure all ICPs are satisfied with our approach to the provision of information/data, including:
- Publication of a comprehensive document providing ICPs with guidelines in respect of self-select Point of Connection limits, design considerations and design approval requirements, including details of how to obtain data from Northern Powergrid;
- Establishment of bi-annual ICP seminars, with the opportunity for ICPs to raise queries in an open forum;
- Monthly ICP surgeries, with the opportunity for ICPs to raise queries in a more confidential environment; and
- Supporting information requests from ICPs via our dedicated Connections Input Services team.

We believe the way in which information/data is provided is the best solution currently available, with the systems currently in operation.

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 service provider 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.

We are not aware of any current areas where NERS accreditation is not available. We will, however, continue to engage with ICPs on this subject at our bi-annual ICP seminars and other external stakeholder events we attend, along with the Competition in Connections Code of Practice working group, to ensure that NERS is made aware of any omissions and implements any new accreditations or modifies existing accreditations as required.

#### 4.9 POINT OF CONNECTION 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.

We have developed and published a standard design matrix for non-technical designs <u>IMP/001/107</u>.

This matrix covers connections to underground cable networks for single domestic and commercial connections of up to 80Amps per phase and up to 20 non-electrically heated plots on a housing development giving maximum design loads of up to 60kVA.

In addition, this matrix now covers LCTs and electric heating as well as public and domestic EV chargers. Maximum limits on ratings and numbers are provided within the matrix.

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.

Our design matrix (IMP/001/107) has been written in the form of a Code of Practice. This provides full details of what can and cannot be connected to our existing distribution network, along with any design limitations and indications of where a Point of Connection determination must be referred for a full technical assessment, either by the ICP or Northern Powergrid.

This design matrix is not reliant upon access to capacity data as the Code of Practice has been developed and written in such a way that, if an ICP follows the rules, any subsequent capacity-related issues will be addressed and covered directly by Northern Powergrid.

Access to our existing mains records is provided in line with 4.6.2 above.

#### 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.

We have developed a Self-Determined Point of Connection Notice form which enables ICPs to notify us when they commence work to self-determine a Point of Connection so that we can issue that self-determined Point of Connection to a customer and receive that customer's acceptance.

This form has been published on our dedicated Competition in Connections web page.

#### 4.12 Self Determination Information

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

We publish the instances in which an ICP can self-determine its own Point of Connection on our dedicated Competition in Connections web page.

A relevant extract of the document is shown below:

Market Segment	Self-determination available (Yes/No)	Comment
LV demand	Yes	Up to 250kVA
HV demand	Yes	Up to 3,000kVA
HV/EHV demand	No	Reference to NPg needs to be made
EHV/132kV demand	No	Reference to NPg needs to be made.
DG LV	Yes	Up to 190kW
DG HV/EHV	Yes	Up to 190kW
UMS LA	Yes	The ICP must follow the design matrix as provided within document IMP/001/007
UMS Other	Yes	As above
UMS PFI	Yes	As above

4.12.1 Instances where an ICP can self-determine their own Point of Connection

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

We publish a code of practice which stipulates the instances in which an ICP can selfdetermine its own Point of Connection utlising our standard design matrix (IMP/001/107).

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	Up to 250kVA	1819	771	201	39
HV demand	Yes	Up to 3,000kVA	1241	1001	0	0
HVEHV demand	No	Reference to NPg needs to be made	38	22	0	0
EHV132 demand	No	Reference to NPg needs to be made	0	0	0	0
DG LV	Yes	Up to 190kW	192	23	0	0
DG HVEHV	Yes	Up to 190kW	570	71	0	0
UMS LA	Yes	The ICP must follow the design matrix as provided within document IMP/001/1007	1,595	0	0 (0 Columns)	0
UMS Other	Yes	As above	420	0	313 (1943 Columns)	0
UMS PFI	Yes	As above	0	0	0	0

#### Table 1: Information on Self-Determination of Points of Connection 1st April 2022 to 31st March 2023

N.B.The Number of DNO quotes issued includes the PLA self-serve order volumes

#### 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.

We publish all relevant design standards and specifications on our website. Examples of some of the relevant documents are listed below, complete with a hyperlink direct to each document.

- IMP/001/007 Code of Practice for the Economic Development of Distribution
   Systems with Distributed Generation
- IMP/001/911 Code of Practice for the Economic Development of the LV System
- IMP/001/912 Code of Practice for the Economic Development of the HV System
- <u>NSP/002 Policy for the Installation of Distribution of Power Cables</u>
- IMP/010/011 Code of Practice for Earthing LV Networks and HV Distribution
   Substations
- IMP/001/012 Code of Practice for Flood Mitigation at Operational Premises

In addition to the above published documents, an ICP can request any further relevant or associated documents by submitting a request to our dedicated Connection Input Services team (<u>CinC.Connections@Northernpowergrid.com</u>) or they can be provided directly to ICPs at our monthly ICP surgeries held either at our offices across our licence areas or virtually.

We continue to work with ICPs to modify and/or amend such policies and specifications so as to ensure our policies do not unnecessarily impede competition and to ensure ICPs are provided with clear specifications.

#### 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.

We have in place an alternative point of isolation arrangement to assist ICPs that request a single or three-phase connection, as follows:

 Where a connection with a maximum demand requirement of up to 55kVA is provided to an Embedded Network, a point of isolation shall be provided at a Northern Powergrid owned cut-out to allow isolation of the Embedded Network. Northern Powergrid will request the right for operational access to the cut-out under emergency situations in line with Engineering Recommendation G88. The Northern Powergrid cut-out shall be fitted with fuses.

A link box continues to act as a point of isolation between our network and an IDNO network for those connections up to and greater than 55kVA.

Three different options have been provided for the installation of link boxes in these instances, which are:

- Northern Powergrid funds and installs the link box either before energisation, if possible, or afterwards, in which case we would not interfere with the ICP's energisation if the link box was not installed beforehand; or
- ICPs can visit one of our manned stores sites, collect a link box and install it on our behalf, for which we would make a cost-reflective payment; or
- ICPs can source their own link box that complies with our specifications and install it on our behalf and be paid a cost reflective price for its provision and installation.

We believe the above options enable an ICP to undertake the work on behalf of its client, if it so chooses, whilst also ensuring we are not on its critical path for the energisation of the relevant connection. We have spoken at length about this issue at our ICP surgeries and, furthermore, have published a briefing on our website that has also been emailed to NERs registered ICPs.

#### 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	
	ICP fully able to self-approve contestable designs*
etc	
*If applicable	

We publish the market segments where an ICP is able to self-approve its own designs on our website.

A relevant extract of the above document is provided below:

.16.3 Table One - The market segments where the ICP is able to self-approve its designs					
Relevant Market Segment (RMS)	Self-approval of designs available (Yes/No)	Comment			
LV demand	Yes	Up to 250kVA			
HV demand	Yes	Up to 3,000kVA			
HVEHV demand	No	Reference to NPg needs to be made.			
EHV132 demand	No	Reference to NPg needs to be made.			
DG LV	Yes	Up to 190kW			
DG HVEHV	Yes	Up to 190kW			
UMS LA	Yes	Any design must be compliant with NPg CoP IMP/001/007			
UMS Other	Yes	As above			
UMS PFI	Yes	As above			

Criteria - Northern Powergrid require any ICP wishing to approve its own designs to hold the relevant NERs accreditation (Electrical Design of Distribution Networks)

The qualifying criteria that applies to ICPs to allow them to move between the different levels of design approval is published on our website.

A relevant extract of the above document is provided below:

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

Level	Criteria
1	Full Design Approvals can be undertaken for the categories as per table 1. These will be inspected as per our published inspection tables at Level 1 rates.
2	Full Design Approvals can be undertaken for the categories as per table 1. These will be inspected as per our published inspection tables at Level 2 rates.
3	Full Design Approvals can be undertaken for the categories as per table 1. These will be inspected as per our published inspection tables at Level 3 rates.
( th	information, places contact our dedicated Connections Insuit Services team on 0112

For further information, please contact our dedicated Connections Input Services team on **0113 241 5245** or email <u>cinc.connections@northernpowergrid.com</u>

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.

Although ICPs are able to self-approve their own designs, they are able to ask us to approve their designs. Consequently, ICPs are still utilising the input services provided by Northern Powergrid for this activity. We will continue to offer this input service in line with SLC15, where requested by an ICP to do so.

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 POINT OF CONNECTION, 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 ICPs elect to self approve their own designs, they are able to commence their contestable works with any required corrective actions being fedback to the ICP in line with the equivalent SLC15 design approval standard, to ensure a timely response is provided, so enabling them to take the required corrective actions at the earliest opportunity possible.

Where corrective actions are required, we request the ICP re-submits its self-approved design with the relevant corrective actions made, which ensures that both the ICP's and Northern Powergrid's operatives are working to a compliant approved design on site.

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.

We are committed to working closely with both ICPs and NERS to ensure the competency of ICPs.

During the period of this report, we have not had the need to notify NERS in relation to the competency of any ICP that is currently active within either of our licence areas.

In instances where we do have concerns with regards to the competency of an ICP, we will highlight those concerns to NERS and the ICP(s) in question in order to resolve the matter in the most effective way.

Market Segment	Self Approval Available (Yes/No)	Comment	Number of SLC15 Designs Approved		
LV demand	Yes	Up to 250kVA	339	46	
HV demand	Yes	Up to 3,000kVA	271	78	
HVEHV demand	No	Discussions will be needed with NPg for anyone wanting to do this work on a job by job basis.	5	1	
EHV132 demand	No	Discussions will be needed with NPg for anyone wanting to do this work on a job by job basis.	0	0	
DG LV	Yes	Up to a maximum of 190kW	15	1	
DG HVEHV	Yes	Up to a maximum of 190kW	25	0	
UMS LA	Yes	Any design must be compliant with NPg CoP IMP/001/007	0	0	
UMS Other	Yes	Any design must be compliant with NPg CoP IMP/001/007	0	0	
UMS PFI	Yes	Any design must be compliant with NPg CoP IMP/001/007	0	0	

### Table 2: Information on Self-Approval of Designs 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023

#### 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.

Our request for final connection (project call off) form facilitates the provision of MPANs for works that we are to adopt. This request for final connection is a requirement of our framework adoption agreement, a copy of which is published on our website.

This form is submitted by the ICP to our dedicated Connections Input Services team who process the MPAN request using the same system and process as is used for our own connections business.

In addition, we have published a guidance document for ICPs which guides them through our MPAN allocation process, along with providing key contact details for our Connections Input Services team and MPAN generation team.

#### 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.

We are not aware of any current areas where NERS accreditation is not available. We will, however, continue to work with both NERS and ICPs to identify any areas of operations not covered by existing scopes of accreditation and to develop new or modify existing scopes as required.

#### 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

We continue to accept G39 authorisations issued to ICP operatives from all DNOs and or Local Authorities accredited under HERS in order to demonstrate an individual's competence to undertake operations/work on public lighting installations and street furniture.

Operatives new to our network and who possess a valid G39 authorisation are given an induction specific to the relevant licensee and are offered access to our training and testing procedures to confirm their competence and understanding of the necessary testing to ensure installations are safe and do not present a safety hazard to the general public.

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

We have developed and published an ICP authorisations options guidance document which sets out the specific requirements for each of the three options set out within paragraph 5.2 of the Competition in Connections Code of Practice.

This includes any generic access requirements such as relevant NERS accreditation(s) and Adoption and Access Agreements. In addition, it provides specific requirements split by voltage for each of the three authorisation options.

Activities	Option 1- ICP (Yes/No)	Option 2 – DNO (Yes/No)	Option 3 – Transfer of control (Yes/No)	Comments
LV Works	Yes	Yes	N/A	Option 3 is not applicable at LV
LV Operations	Yes	Yes	N/A	Option 3 is not applicable at LV
HV Works	No	Yes	Yes	Network access arrangements to be agreed between Northern Powergrid and the ICP on a case specific basis
HV Operations	No	Yes	Yes	Network access arrangements to be agreed between Northern Powergrid and the ICP on a case specific basis
EHV Works	No	Yes	No	Network access arrangements to be agreed between Northern Powergrid and the ICP on a case specific basis
EHV Operations	No	Yes	No	Network access arrangements to be agreed between Northern Powergrid and the ICP on a case specific basis
Unmetered Works	Yes	Yes	N/A	Option 3 is not applicable at LV
Unmetered Operations	Yes	Yes	N/A	Option 3 is not applicable at LV

#### Table 3: Information on Authorisations – As at 31<sup>st</sup> March 2023

#### 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.

We accept NERS accreditation of an ICP and do not undertake any audits to either assess or validate the ability of an ICP to undertake activities covered under NERS.

We only undertake quality assurance inspections of physical works that have been carried out by an ICP where the ICP requires us to adopt the assets it has constructed. Should we have any concerns relating to the competence and/or quality of works carried out by an ICP, we will notify NERS of those concerns in line with our obligations under paragraph 4.16.8 of the Code of Practice.

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.

We continue to work with both ICPs and NERS to extend contestable boundaries and, where there is a requirement to provide Northern Powergrid accreditation in the absence of NERS accreditation, such arrangements will be no more onerous than those used by NERS or by Northern Powergrid for its own connection works.

#### 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 nonconformance 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.

We undertake sample quality assurance ("QA") inspections of assets installed by ICPs prior to adoption of those assets and also of works delivered by our own staff and contractors. Inspections are carried out by our enhanced audit team within the Health, Safety and Training Directorate which is independent of our connections delivery functions.

Furthermore, we employ Lloyd's Register to undertake independent QA inspections of a sample of new connections works undertaken by both ourselves and ICPs. The service from Lloyd's Register independently verifies compliance with installation specifications and allows us to compare Lloyd's Register's findings against the inspection results of our enhanced audit team.

The number of QA inspections of ICPs is dependent upon the scale and type of work being undertaken and also the QA inspection level at which the ICP is operating. Inspection levels of ICPs are reviewed on a six monthly basis.

All ICP QA inspection reports are sent by email to the relevant ICP site managers and include details of any non-conformances identified by the inspection. In an identical manner, all QA inspection reports of work being undertaken by Northern Powergrid are sent to the relevant Northern Powergrid site manager and also include details of any non-conformances identified by the inspection.

An individual QA performance information pack is sent to each ICP that is "active" in our licence areas on a six monthly basis. The pack provides the ICP with information collected over the previous 12 months that includes:

- The number of QA inspections undertaken;
- The number of minor and major non-conformances found; and
- A graphical representation of the ICP's QA inspection performance in comparison to Northern Powergrid's own performance. The graphical information also shows the performance of all other "active" ICPs on an anonymised basis.

An identical QA performance information pack is also sent to Northern Powergrid's senior managers detailing performance of our own works over the same period.

Further details of the site QA process can be found on our website.

We also operate a formal site disputes escalation process through to executive director level for the purposes of ensuring that matters of dispute with installation specification and practice are quickly raised at an appropriately defined and designated level. This means that all parties can work to resolve the issues effectively and efficiently for the benefit of the end customer whilst ensuring quality and safety standards are maintained.

	Number of Inspections Made	% of inspections made	Number of Connections made (exit points)	Comments
DNO	114	2.3%	10,634	N/A
ICPs	86	*9.1%	2,697	*The number of Connections (exit points) is not easily comparable as between the DNO and ICPs. This is due to the definition of Connection meaning that, for an IDNO, a Connection is a single exit point, regardless of the fact that such a Connection will always have multiple, individual connections associated with it. In the DNO's case, each individual Connection is an exit point. The total number of individual connections by ICPs in the period is unavailable.

#### Table 4: Information on Inspections carried out between 1 April 2022 and 31 March 2023

#### 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.

We have developed and published a land rights guide specifically for ICPs and IDNOs.

This guide sets out where land rights are required along with a detailed overview of the options available to ICPs with regards to land rights.

Our land rights process is no more onerous than for activities associated with the construction, replacement, renewal, refurbishment, operation and maintenance of our electricity distribution network.

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.

Our incorporated rights process allows IDNOs to negotiate on behalf of Northern Powergrid to secure, on a 'subject to contract' basis, the land rights required for the connection of the IDNO's network to our network.

In these instances, the IDNO will obtain a transfer or lease of the substation that it will own. Within the same document, the IDNO will incorporate the legal rights that Northern Powergrid will require to cover any easements and access arrangements to the substation. Northern Powergrid will not be a signatory to this document and our legal advisers will not be involved in the process, provided that the document is completed in the agreed form.

If any changes are required to the agreed form of documentation, the IDNO will refer the proposed changes to the Northern Powergrid Wayleave Officer who will then consult with our legal advisers to review the proposed changes. A copy of our standard form of Incorporated Rights Agreement with IDNOs is available upon request from our Wayleaves Team or can be found on our website.

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.

We publish model standard land rights documentation on our website for use by ICPs to enable them to prepare legal documentation for land rights ahead of execution by Northern Powergrid.

The following are direct links to these published documents:

- Northeast Owner and Occupier agreement <u>click here</u>
- Yorkshire Owner and Occupier agreement <u>Click here</u>

#### 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.

We include the requirement for ICPs to provide as-laid drawings and test certificates within the terms of its framework Adoption and Access Agreement.

For high volume LV connections such as unmetered, we have worked closely with ICPs undertaking such activities and, as a result, have modified the terms of the framework Adoption and Access Agreement to allow ICPs to submit as-laid records a maximum of 48 hours after the works have been completed.

Such information is required in the same format and to the same standard as that required from our own staff or sub-contractors. To support this, we provide ICPs with copies of our own test sheets, should they wish to complete these sheets rather than using their own.

#### **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.

We publish our main complaints process on our website at <u>complaints procedure</u> information guide.

In addition to this and following the introduction of the Competition in Connections Code of Practice, we have developed and published further ICP specific complaints escalation procedures for some specific elements of our Competition in Connections process where necessary.