

# Contestability Readiness Criteria

LV Final Connections

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## 1. INTRODUCTION

In July 2021, the Utility Regulator (UR) published a paper which confirmed the next steps in taking forward contestability of electricity connections in Northern Ireland. The UR paper specified that Low Voltage (LV) final connections to the Distribution System would form part of the Contestable Works to be undertaken by Independent Connection Providers (ICPs).

Along with the UR and other stakeholders represented on the Contestability Working Group (CWG), NIE Networks has been developing the arrangements for contestable LV final connections. It is imperative that the arrangements minimise any risks introduced by the expansion of the scope of contestability and NIE Networks' management requires to be satisfied that the arrangements are fully in place before allowing LV final connections to be undertaken contestably.

The arrangements include technical, legal and commercial measures, including the development of, among other things:

- An enhanced legal framework
- Reforms relating to safety management and safety rules
- Modifications to ICP accreditation, and
- Updated documentation.

This document sets out in the following sections the arrangements and documentation which must be in place for NIE Networks to permit the extension of contestability to include overhead and underground LV final connections to the Distribution System. <sup>1</sup>

The target date for the implementation of underground and overhead final LV connections is 1 November 2022, the 'Go-live' date.

## 2. SAFETY

### Safety Management System and Safety Rules

The existing contestability arrangements do not permit ICPs to work on the Distribution System and, when undertaking the Contestable Works, ICPs currently operate under their own Safety Management System (SMS), including their own Safety Rules.

With the expansion of contestability to include LV final connections, NIE Networks has had to consider which SMS, including Safety Rules, ICPs should operate under when making the LV final connection to the Northern Ireland Distribution System.

NIE Networks has decided that when making the LV final connection, ICPs shall operate under their own SMS, including their own Safety Rules.

Based on a review of the Model Safety Rules, NIE Networks has now agreed to draft a list of potential areas of concern which will be provided to LRQA to establish if these matters are already addressed in ICP Safety Rules or in a subsidiary procedural document. If not, further discussions will be required. To enable ICPs to undertake LV contestable connections at the Go-Live date,

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<sup>1</sup> Connections to plant (pillars and cabinets) will be implemented at a later date.

this exercise must be completed in October.

### Amendment of NIE Networks' Safety Rules and SRIs

The NIE Networks Safety Rules currently contain provisions for only two categories of people to work on the Distribution System – NIE Networks' staff and staff employed by NIE Networks' contractors.

Allowing an ICP to undertake work on the Distribution System requires changes to the NIE Networks' Safety Rules and Safety Rules Instructions (SRIs). These will require to be in place for Go-live.

## 3. LEGAL DOCUMENTATION

### Access Agreement

A new Framework Network Access Agreement is being developed and will be required for Go-live. The agreement sets out a legal framework for the ICP to gain access to the NIE Networks' Distribution System to complete the LV final connection.

In addition to the framework agreement, a Network Specific Access Agreement process is also being established, which will define the arrangements for specific LV final connections.

### Adoption Agreement

The Tripartite Adoption Agreement currently refers to NIE Networks always undertaking the LV Final Connection, energising the Contestable Works and carrying out the post-energisation Commissioning Tests. Minor clarification amendments are required to reflect the ICP role going forward. It will also set out the remedial actions to be taken if Major Defects are identified in the Contestable Works after energisation.

## 4. REGULATORY DOCUMENTATION

### Statement of Connection Charges

The Statement of Connection Charges (SoCC) is required by Licence Condition 32 of the NIE Networks Distribution Licence and it sets out the basis on which charges will be made for connection to the Distribution System. NIE Networks cannot levy any connection charges on customers which are not included in the SoCC.

Additional charges are required to be incorporated into the SoCC in relation to charges for the provision of Non-contestable Works, for example:

- Assistance in the identification of LV PILC cables
- Hire of a voltage discriminator device (VODCA)
- Emergency disconnection of the Contestable Works in the event of post-energisation test failures, and
- Additional inspections required if the LV final connection is not fit for energisation.

While not a licence requirement, there is an understanding that the SoCC shall be published on the NIE Networks' website at least one month prior to becoming effective, meaning it must be

available to view on the website by 30 September 2022.

### Guidelines For Contestability in new Connections to the Distribution System

The Guidelines is produced jointly with SONI and establishes the principles of contestability. It is not a legally binding document but is referenced in other contractual documents and in the SoCC.

The Guidelines document was required by the UR in 2015, to provide a user's guide to the scope of contestability and to define the applicable processes.

Changes are required to reflect the extension of contestability and to describe other developments, such as the establishment of the Framework Network Access Agreement and the Network Specific Access Agreement.

## 5. ACCREDITATION

### Accreditation requirements

ICP accreditation requirements are set out in the LRQA document, National Electricity Registration Scheme (NERS) in Northern Ireland, dated February 2018.

This document requires to be updated by LRQA to reflect the additional accreditation required by ICPs and to reflect the requirements to assess an ICP's SMS and Safety Rules, which will apply in making the final connection.

It will also need to be updated to reflect additional competencies for LV final connections.

## 6. TECHNICAL SPECIFICATIONS, POLICIES AND PROCESSES

A number of technical documents require to be updated for Go-live:

- Policy 5/009 V4 - LV to 33kV LV to 33 kV Underground Cable Installation
- ICP Material List, March 2022
- Live jointing guidance document, and
- Internal process maps.

## 7. INTERNAL PROCESSES

Internal business processes must be implemented for Go-live which will set out:

- How jobs will be assigned and managed
- How NIE Networks' staff will maintain oversight of Contestable Works which are entirely contestable, and
- The roles of ICP co-ordinator(s) and Connections Delivery Engineers.

## 8. INTERNAL STAFF TRAINING

Training is required to ensure that NIE Networks' staff are competent to:

- Differentiate between Routine and Non-Routine work, as defined in SRI 13, and
- Undertake inspections prior to the ICP making the LV final connection

Measures are being put in place to recruit and train additional inspectors but that is not critical to Go-live.

## 9. IT REQUIREMENTS

ICP Portal will need to be modified to allow ICPs to upload Network Specific Access Agreements in order to carry out live connection works.

There will also need to be a new category within the ICP Portal document library that will allow sharing of HS&E documents such as AORs & SCIs.

There is no requirement to allow ICPs to access CNS and E600 systems at this time. However, this is being considered as part of future updates of both systems.

## 10. EXTERNAL COMMUNICATIONS

As stated above, for LV final connections to be contestable at Go-live ICPs must be made aware that they need to submit their Safety Rules to LRQA for assessment in time for a comparison to be made and any modifications completed. That information will be communicated through the CWG and the ICP Portal.

## 11. LV FINAL CONNECTION TRIALS

The current project plan shows LV final connection trials taking place before Go-live. However, NIE Networks now considers that trials on 'real' jobs are likely to introduce difficulties relating to the new legal framework and the application of ICP SMS and Safety Rules. NIE Networks has therefore decided that trials before Go-live are inappropriate and, instead, NIE Networks will closely monitor early LV final connections after Go-live and provide any relevant observations and recommendations to the ICP.

LV final connection trials are consequently no longer applicable to the Go-live decision and the project plan will be amended accordingly.

## 12. SUMMARY AND CONCLUSIONS

This document sets out the arrangements and documentation which must be in place before the implementation of contestable LV final connections can be permitted.

The document will be of interest not only to NIE Networks but to the members of the Contestability Working Group, ICPs, customers and other stakeholders as it sets out the actions required to be undertaken to ensure the planned Go-live date is achieved.