

**Respondent Details**

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<b>Respondent Name:</b>	Carl Hashim
<b>Designation:</b>	
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No.	Question	Your response	Consent to Publish Response (Y/N)
Q1	How would you define 'contestability'?	<p>The relevant market segment, as regards the Distribution system, could potentially include all LV/MV voltage levels i.e. LV, 6.6kV, 11kV and 33kV.</p> <p>Activities that could be considered contestable include design, procurement and building of sole use connection assets.</p> <p>Implementation of contestability needs to consider a range of matters, including design standards, specification of equipment and materials, approval of proposed connection design, inspection, testing, commissioning, wayleaves and easements, routing decisions.</p> <p>In relation to the Transmission system, SONI will hold its own views; NIE would in principle also support Transmission connection contestability, with a broadly similar approach to implementation as for the Distribution system.</p>	Y
Q2	<p>What do you see as the main benefits of introducing contestability in new connections:</p> <p>A) To the consumer?</p> <p>B) To your company?</p>	Contestability introduces competition to this aspect of the electricity industry in Northern Ireland.	Y
Q3	What is the nature of your company's business?	Northern Ireland Distribution Network Operator (DNO) and Transmission Owner.	Y
Q4	<p>What is your role in making new connections to the electricity network...</p> <p>A) At present?</p> <p>B) In the future?</p>	NIE currently has responsibility for quoting for connections to the Distribution system, and for constructing the physical connection. With respect to the Transmission system, SONI has responsibility for quoting the connectee; while NIE is responsible for constructing the connection.	Y
Q5	<p>What past experience do you have in making new connections to the electricity network...</p> <p>A) in Northern Ireland?</p> <p>B) or elsewhere? (Please state location)</p>	NIE is currently the sole provider of all activities associated with connection to the distribution network, and of construction services for connections to the transmission network.	Y
Q6	What type of connections are you interested in?	Question for other respondents.	Y
Q7	<p>Should contestability be applied to:</p> <p>A) Transmission and distribution connections?</p> <p>B) Onshore and offshore connections?</p>	Could be potentially applicable to all cases defined in A) and B).	Y

No.	Question	Your response	Consent to Publish Response (Y/N)
Q8	To what extent should different rules apply to Transmission Network Operators and Distribution System Operators?	NIE considers that as a general principle, and unless there are strong reasons to differ, the rules should be the same for contestability in connections at the transmission and distribution levels.	Y
Q9	To what extent should different rules apply to offshore connections and onshore connections?	Consideration should be given to both onshore and offshore connections. The approach to offshore should take into account the different risk profile of offshore network build; where the various risks are best placed - and therefore in the interests of the NI customer; and given this, how interfaces should be defined.	Y
Q10	What industry codes would require updating to facilitate contestable connections?	<p>The design and connection of new load or generation to the distribution network must be in accordance with the 'Distribution Code' (and the 'Grid Code' for larger load and generator connections), meet with NIE's 'System Security and Planning Standards (SSPS)' and the NI ESQC Regulations. If the design of the connection assets, as well as their construction, became open to contestability, the 3rd party would have to ensure compliance with these requirements before NIE would agree a connection to the distribution network. This may require an amendment to the D Code and the SSPS and will require some form of contractual sign-off by both parties.</p> <p>NIE would still have a responsibility for the shallow and deep reinforcement of the existing distribution network to ensure compliance with licence and statutory obligations following the connection of a new section of network supplying a load or generation customer. This will necessitate NIE obtaining the same level of information that is required by the party designing the contestable element of the connection asset. This will ultimately be the responsibility of the prospective customer seeking the connection and their associated Connection Agreement. Consequently, the customer will be dealing with more than one party for terms for connection to the network. Areas of responsibility will need to be clearly defined and documented.</p> <p>In addition, and assuming that connection assets built by a competitor will need to be transferred to NIE upon</p>	Y
Q11	What works should be deemed as non-contestable?	NIE would suggest the following activities are non-contestable: definition of point of connection; design of point of connection and any reinforcement or diversion works needed; making final connection to network.	Y
Q12	How should operations and maintenance be managed during the lifetime of a contestable asset?	The DNO (NIE) should be responsible for operation and maintenance throughout the lifetime of the asset, and - assuming we retain the current approach - this will be paid for by the connectee.	Y
Q13	Should different degrees of contestability be introduced for each connection type?	The experience in GB suggests that it may be appropriate to consider some market segments more suited to contestability than others. Therefore NIE's answer to this question is 'potentially, yes'.	Y

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Q14	What are the barriers to introducing contestable connections?	Other than any specific legislative or regulatory requirements that could potentially be considered barriers, NIE does not perceive any other specific barriers. Clarity is needed however on the rationale for what are defined as contestable activities, in each relevant market segment, and crucially on clear agreement and definition of interfaces in the processes between the DNO and connectees and their agents. If contestability is introduced at the transmission level, SONI's role in the connection process will need to be clarified.	Y
Q15	What is the current impact of not having contestability in the connections market?	Reduced choice for connectees.	Y
Q16	What is your view of best practice in regard to contestable connections?	Refer to Q14.	Y
Q17	What type of arrangements would achieve the right balance between contestable and non-contestable works?	Refer to Q1.	Y
Q18	What problems could arise from the introduction of contestability?	Initial confusion if processes and interfaces are not properly defined; undermining of DNO's ability to meet its licence obligations if these are not properly taken into account - for example routing decisions. These need to take account of DNO licence obligation to develop the network efficiently, which would be undermined if a route corridor was used up, so that future backbone network development was forced into a less efficient route.	Y
Q19	How much of a factor is the cost/timing of a new connection in regards to setting up a business/generator?	Question for other respondents.	Y

No.	Question	Your response	Consent to Publish Response (Y/N)
I1-1	Describe your issue		
I1-2	How often does this issue arise?		
I1-3	Where does the issue arise?		
I1-4	What more could be done to deal with the issue?		
I1-5	Why can't the issue be dealt with or what are the barriers to implementing change?		
I1-6	How has delivery of your connection been affected by this issue?		

No.	Question	Your response	Consent to Publish Response (Y/N)
I2-1	Describe your issue		
I2-2	How often does this issue arise?		
I2-3	Where does the issue arise?		
I2-4	What more could be done to deal with the issue?		
I2-5	Why can't the issue be dealt with or what are the barriers to implementing change?		
I2-6	How has delivery of your connection been affected by this issue?		

No.	Question	Your response	Consent to Publish Response (Y/N)
I3-1	Describe your issue		
I3-2	How often does this issue arise?		
I3-3	Where does the issue arise?		
I3-4	What more could be done to deal with the issue?		
I3-5	Why can't the issue be dealt with or what are the barriers to implementing change?		
I3-6	How has delivery of your connection been affected by this issue?		