

Competition in Connections Code of Practice

Reporting Requirements

Electricity North West

September 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 (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.

On receipt of an application from the customer, the application is registered on our corporate SAP based system in around three days on average. On registration, an acknowledgement letter is automatically sent to the customer that highlights they have a choice and directs them to our website for more information.

Information for customers, including what an ICP is and how to find an ICP is described on our website [here](#).

Further information is provided [here](#) that provides:

- a link to the National Electricity Registration Scheme (NERS) operated by LRQA.
- another link listing the ICPs in our area that have registered with us.

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.

A summary of information to help customers understand the requirements for the competitive market is laid out on our website [here](#). This includes general information on the competitive market, what an ICP is and how to find an ICP.

The definitions of what an ICP and IDNO is, are provided [here](#).

Further information is provided [here](#) that provides:

- a link to the National Electricity Registration Scheme (NERS) operated by LRQA.
- another link listing the ICPs in our area that have registered with us.

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 the customer makes a request for a connection, we issue convertible quotes as standard for all metered connections in the Relevant Market Segments where there is contestable works.

The customer then has the choice of work to be carried out by us or to accept the non contestable work offer and use an ICP for the contestable work. An example of our connection offer is shown as a separate annex to this document - [here](#).

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.*

When producing a convertible quotation, we include the information detailed above - see example quotation on our website - [here](#).

- i. A Point of Connection drawing is issued with the offer, example - [here](#).
- ii. The example shows the charges for the reinforcement work.
- iii. Any diversions would be shown in a similar way to the reinforcement charges.

The convertible quote has a breakdown of charges on the third page. These are split between contestable and non-contestable. A summary of the works involved is shown on page two. The options are described throughout the offer and the acceptance form clearly shows them.

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.

This is shown in the example Connection Offer on our website - [here](#).

The charges for the reinforcement works are identical for both Option 1 (ENWL completing all the works) and Option 2 (ICP completing the contestable works).

The non contestable charges for 'operational work', 'Legal' and 'substation locks and notices' are identical for the two options.

The only differences are:

- The assessment and design charges differ between the two options, consistent with our connections charging statement.
- There is a design approval charge ('design charges') included for Option 2 where the ICP undertakes the contestable work.

There is an inspection charge included in Option 1 but not in Option 2. We charge ICPs in arrears for any inspections carried out and therefore these are not included in our offer.

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.*

An overview of how to self-determine points of connection is provided [here](#).

No circumstances have been excluded, but 'network integrity checks' may be required under certain circumstances. These are detailed on our website and in the user guide – [here](#), extract below.

Voltage	Type	Conditions for approval (network integrity check)
Extra High Voltage (33kV and 132kV)	Demand, generation, or mixed	All submissions will be subject to a network integrity check
High Voltage	Demand, generation, or mixed	All submissions >500kVA will be subject to a network integrity check
Low Voltage >100kVA	Demand, generation, or mixed	All submissions >100kVA or >25% feeder rating will be subject to a network integrity check
Low Voltage <100kVA	Demand, generation, or mixed	No network integrity check required

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).*

The information required by ICPs to assess Points of Connection is contained within a comprehensive guide document 'Self Determination of Points of Connection User Guide' accessible on line [here](#).

This guide document gives a link to all relevant documents which are also listed on this website page - [here](#). All relevant documents are now in our G81 section - [here](#) to improve accessibility. This also includes an index showing approved plant and materials and a full list of applicable Policies and where they are stored to assist with user navigation, hyperlinks are added where possible.

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.

- i. The information for geographical network records is found in our Network Asset Viewer, customers can register online [here](#), following registration they can log in [here](#). Customers can use this viewer on a 24/7 basis, and it provides asset information on all assets. It also contains a trace function to assist in linking assets together. The information is equivalent to ENWL and is updated on a regular basis.
- ii. The other information is all held in a secure area of our website. This is accessible once registered. Customers can register [here](#). Once registered and logged in, customers can find load information on the "HV Network Data" page within the Secure Area – Link to log in page – [here](#).
- iii. Relevant design standards and G81 documents are all provided on our website [here](#).
- iv. Information on asset sizes and ratings are located in Appendix 3 in the Long Term Development statement. The transformer data is in Table 2 and circuit data is in Table 1. Link to log in page – [here](#).
- v. Network operational diagrams (schematics) are provided in Appendix 2 in the Long Term Development Statement. Link to log in page – [here](#).

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.

We have representation on NERSAP (National Electricity Registration Scheme Advisory Panel), attendance evidenced on the NERS Advisory Panel minutes, available – [here](#).

The only area that had been identified is the level of design accreditation needed for ICPs that are only undertaking small services work which could be completed under a Standard Design Matrix. We raised this previously which has been considered by the NERS Advisory Panel and a solution agreed.

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.

We discharge the obligation to provide the Standard Design matrix through Electricity Policy Document 283 - Low Voltage Design which is available within the Planning and Design section of the G81 Policy Documents on our website. Link [here](#)

Electricity Policy Document 283 - Low Voltage Design is a complete reference for LV design combining 11 LV planning documents into a single entity to provide a complete reference for LV Design. This document is now in a modular format with links added throughout the document to aid navigation.

See also our response to the following question, 4.9.2.

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

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

The overall process is described in a flowchart contained in our guide document 'Self Determination of Points of Connection User Guide' accessible on our website, [here](#).

More detailed guidance, process flow and the Standard Design Matrix to assist in assessing the capacity that can be connected, is contained in Electricity Policy Document 283 - Low Voltage Design which is available within the Planning and Design section of the G81 Policy Documents on our website. Link [here](#).

Relevant design standards and G81 documents are all provided on this website [here](#).

Information is held in a secure area of our website, which is accessible once registered. Customers can register [here](#). Once registered and logged in, log in can be found [here](#), customers can find load information, capacity data to be used within the Standard Design Matrix and transformer maximum demand indicator readings.

Information on asset sizes and ratings are located in Appendix 3 in the Long Term Development statement. The transformer data is in Table 2 and circuit data is in Table 1.

Geographical data can be found by registering for NAV, registration and access can be found [here](#).

We have also introduced a downloadable version of the asset viewer, customers can register to download our GeoPackage of asset information, [here](#).

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.

Effective communication is covered in process flows described in the user guide document 'Self Determination of Points of Connection User Guide' accessible on line [here](#).

Information relating to self-determination of Point of Connection (PoC) is available on our website [here](#), including previous workshops, training webinars and a 'contact us' link should additional guidance be required.

To simplify the process we have produced a Self Determination 'Notification Form' and 'Acceptance Form' for ICPs to complete at different stages in the process, available on our website [here](#).

In response to a Point of Connection Notice we will provide the following information, which is an extract from our user guide:

Once we have received the information relating to the new PoC, we will undertake an initial check to see if there might be any engineering complexities or challenges which might affect the connection. The initial checks will cover:

- a. Any other known PoC for this site*
- b. Known interactivity in the area*
- c. If the site is surrounded by a heavily loaded network*
- d. Known engineering difficulties in the area*

All of our relevant network information required to undertake a self determined Point of Connection is published on our website as described in our response to 4.6.2 earlier.

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		

The common template has been completed and is available from a link on our website – The link is titled ENWL Competitions in Connections Code of Practice Tables and can be found [here](#).

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

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

The common template has been completed and is available from a link on our website - The link is titled ENWL Competitions in Connections Code of Practice Tables and can be found [here](#).

Table 1: Information on Self Determination of Points of Connection

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	All submissions >100kVA or >25% feeder rating will be subject to a network integrity check	2,104	2,604	0	0
HV demand	Yes	All submissions >500kVA will be subject to a network integrity check	1,637	2,069	0	0
HVEHV demand	Yes	All submissions will be subject to a network integrity check	1	22	0	0
EHV132 demand	Yes	All submissions will be subject to a network integrity check	37	14	0	0
DG LV	Yes	All submissions >100kVA or >25% feeder rating will be subject to a network integrity check	3,158	21	0	0
DG HVEHV	Yes	All submissions >500kVA will be subject to a network integrity check	668	14	0	0
UMS LA	Yes	No check required	178	0	2,014	0
UMS Other	Yes	No check required	238	0	0	0
UMS PFI	Yes	No check required	61	0	152	0

* Data for full year April 22 to March 23

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.

All our standards and policies commonly referred to when undertaking connections work are listed in our User Guide found [here](#).
 All relevant design standards and specifications, including the library of G81 standards is available via our website - [here](#).

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 do not require any onerous boundary requirements between an IDNO's network and our network. For example, a link box is not a requirement as set out in our Engineering Specification ES225, extract below:

- 7.1 *Low Voltage Connections from Low Voltage Network*
 - 7.1.1 *These arrangements are suitable for a connection of up to 300kVA capacity.*
 - 7.1.2 *The IDNO Network may be directly connected to Electricity North West's network by a cable joint. There is no requirement for a link box or feeder pillar at the interface point in order for Electricity North West to fulfil its obligations.*

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

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

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

*If applicable

The common template has been completed and is available from the "ENWL Competition in Connections Code of Practice Table" link on our website found [here](#).

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.

The high level process and user guide for self-approval of design, are on our website - [here](#).

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.

The design approval inspection process is documented in our Self-Approval User Guide, which can be found on our website [here](#). The process for self approval and the audit regime can be found in "Self Approval User Guide" this can be found [here](#).

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.

Arrangements are in place to highlight any concerns we may have of any accredited ICP. None were serious enough for us to request an investigation in the reporting year though we have requested investigations in previous years. One instance of a company incorrectly stating on their website that they were NERS accredited was reported to LRQA by us. LRQA instructed the company to remove this incorrect information.

Any non-conformances we observe are recorded on an electronic system and the ICP receives a non-conformance report which is created via our site inspections.

Table 2: Information on Self Approval of Designs

Market Segment	Self Approval Available (Yes/No)	Comment	Number of SLC15 Designs Approved	Number of Self Approved Designs
LV demand	Yes	Levels apply, see below	668	2
HV demand	Yes	Levels apply, see below	560	4
HVEHV demand	Yes	No levels in place due to small volumes	0	0
EHV132 demand	Yes	No levels in place due to small volumes	0	0
DG LV	Yes	Levels apply, see below	0	0
DG HVEHV	Yes	Levels apply, see below	18	0
UMS LA	Yes	All self approved	0	2,014
UMS Other	Yes	All self approved	0	0
UMS PFI	Yes	All self approved	0	152

* Data for full year April 22 to March 23

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.

The processes for facilitating the provision and registering of MPANs is described – see link [here](#).

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.

Where additional scopes are required ENWL are committed to work with LRQA to create the new requirements in co-ordination with the other DNOs.

We currently use the NERSAP forum to raise these changes. We have previously raised one review of accreditation requirements as described in 4.8.2.

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

The general requirements for authorisations is contained in Part C of the industry's "Competition in Connections Code of Practice"

The ICP can either utilise ENWL authorisation, which is our preferred approach, or self authorise.

For ENWL authorisation we acknowledge third party G39 training. This information is contained in CP614, Authorisations, Section 12, available on our website in the Operations section of G81 Policy - [here](#), with the relevant extract shown below:

12.3 Street Lighting Contractors

12.3.1 For street lighting contractors working for local authorities, provided that the third party contractor's employee is authorised to carry out the work for their employer and their employer can show that they have the necessary experience and technical knowledge then they can be authorised, for removal and replacement of the cut-out fuse, as follows:

*(a) Prior acceptance in writing of third party training covering ENA Engineering Recommendation G39/1; **AND***

(b) Interview by the System Operations Manager or nominated deputy.

For self authorisation the application of these requirements is contained in the ENWL CP639 Work on Street Lighting and Street Furniture, section 5 with the relevant extract shown below:

5.3 Self Assessment and Authorisation

(a) As an alternative to authorisation from Electricity North West, Authorities or their Agents who are G39 certified and follow recognised nationally accredited operative competency scheme such as the Highways Electrical Association's Electrical Registration Scheme (HERS) shall, by written agreement with Electricity North West, be allowed to operate a regime of self-assessment and administration of authorisation.

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*

Our approach to the authorisation of ICP employees is summarised on website [here](#). Links are provided on this website to give more detailed information on self-authorisation, ENWL authorisation and delegated ENWL authorisation (transfer of control). Further information can be found in Code of Practice 635 "Accreditation and Authorisations of Independent Connection Providers (ICPs)", a copy of this can be found in the G81 Policy Documents under Operations - [here](#).

All three options are available plus a fourth not included in the Code of Practice. The table below shows how our options align with the Code of Practice options. In addition, for ICPs that chose to use Option 2 in the Code of Practice, they can be approved by us to carry out the interview and assessment of their staff to be given an Electricity North West authorisation.

Electricity North West options	Alignment to Code of Practice options
Option A – Self-authorisation	LV is Option 1- ICP authorisation of ICP employees and contractors. HV is Option 3 – Transfer of control
Option B – Electricity North West authorisation	Option 2 – DNO authorisation of ICP employees
Option C – Delegated Electricity North West authorisation	This is not a requirement in the Code of Practice but an additional option that we offer. It is similar to Option 2 but allows the ICP's own staff to carry out the authorisation interview process, subject to our approval.

Table 3: Information on Authorisations

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

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.

Audits of ICPs accredited under NERS will be undertaken by LRQA. We do not undertake audits on ICPs, only inspections.

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 only utilise NERS for the accreditation of ICPs and therefore this requirement does not apply.

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.

We have an inspection policy that covers all our work; it covers connections work carried out by us and our contractors, connections work completed by ICPs and all other work on our network carried out by our term contractors. Our quality assurance regime is therefore the same for ICPs and our own connections activities.

There is a single team that carry out these inspections on a consistent basis and sit in our Health, Safety, Environment and Quality (HSEQ) section which is independent from any of the operational sections that are inspected.

The team is a small team and they regularly liaise to moderate any inspection findings with any issues raised to their line manager to ensure a fair and consistent approach. Importantly this moderation is across all the activities to ensure that there is consistency across the different work types and the different providers.

ICPs provide us with a weekly whereabouts (updated for any changes) and we decide which sites to visit in response to their activities. We do not believe we cause any delays to ICPs completing their works.

Our quality assurance regime is built up from a series of defined questions for each specific activity ie there will be a different set of questions for cable laying and cable jointing. Each

question is assigned a score based on our view of the risk associated with the activity. Scores are assigned as a 5, 10, 15 or 20. If the inspection finds the aspect to be assessed is not met then this results in a score for that activity. If the inspection scores 20 or more then the inspection is classified as a fail. This means that minor non-conformances will not necessarily result in an inspection being failed.

All non-conformances are communicated to the operatives verbally on site if they are present and are also entered into our inspection database. This database is accessible to each ICP for their inspections through a web interface. Each non-conformance is also emailed to the ICPs nominated representative. The ICP updates the system when the non-conformance has been rectified. A weekly list is also sent to each ICP identifying any non-conformances that are still unresolved on the system. An ICP update automatically notifies the inspector that notified the non-conformance and then they can then decide if a further inspection is necessary.

Table 4: Information on Inspections

	Number of Inspections Made	% of inspections made	Number of Connections made (exit points)	Comments
DNO	532	82%	4,572	
ICPs	119	18%	2,689	

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.

Guidance and criteria relating to land rights are provided on our website - [here](#). These are no more onerous than those relating to our own connections activities.

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.

Details of our incorporated lands rights process can be found in our specific guidance notes on land rights. The ICP information can be found – [here](#). The IDNO information can be found – [here](#).

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 provide model Land Rights documentation upon request by ICPs.

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 specify our requirements for as laid drawings through a ICP/IDNO user guide to assist them, this document can be found - [here](#). There is an internal Code of Practice instructing ENWL staff of the as-laid requirements, both documents contain the same information.

The specifications for the asset testing and commission can be found in the Commissioning section of the G81 Policy on our website - [here](#) and commissioning forms can be located [here](#). The standards outlined are applied internally and externally.

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.

Where a party considers that we are not meeting our obligations, the complaints process to follow is published on our website - [here](#).