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2 May 2023

Dear Thomas,

Thank you for giving us the opportunity to comment on Ofgem's proposed amendments to the Electricity (Connection Guaranteed Standards of Performance) Regulations 2015. This submission is not confidential and may be published on our website.

Answers to consultation questions are provided below:

Q1. Do you agree with the proposed new payment levels updated to reflect inflation since 2015?

The proposed payment levels will be made more appropriate by reflecting inflation since payment values were last updated in 2015.

However, we cannot determine whether the new payment levels reflect the inconvenience costs, as it is unclear how Ofgem established payments at that initial level in the first place.

Q2. Do you agree with the proposed mechanism for the annual adjustment of payment levels?

Yes, yearly inflation updates ensure payments remain appropriate.

We agree that the future payment adjustments are based on the payment levels in January 2023 and then rounded to the nearest multiple of £5. We support this option rather than taking January 2015 as the base payment level because it will align with the proposed change in GSOP severe weather compensations arrangement and another regulatory framework like RIIO-GD 2 price control approach.

Patron HRH The Princess Royal Chief Executive Dame Clare Moriarty

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Q3. Do you agree with the proposed amendments to the Electricity (Connection Standards of Performance) Regulations 2015?

No answer

Q4. Do you agree with the proposed implementation date for the new payment levels?

We agree with the proposal to implement new payment levels on the date the amendments to the regulation come into force. It will ensure that customers receive the updated payment amounts at the earliest date.

Q5. What are your views on proposed interim arrangements?

We prefer the implementation of a new payment level immediately. But we agree that there is a need for an interim arrangement between the decision being made and new regulations taking effect if the implementation was set to 1st April 2024. We recommend that all DNOs voluntarily increase payments to the new level during the interim period, similar to DNOs voluntarily lifting the cap during Storm Arwen.

Q6. Do you agree with the proposed arrangement for communication of future updates in payment levels to customers?

We agree that DNOs should work together to update the payment levels annually and be responsible for publishing information about connection GSOPs, including payment levels, on their websites so that consumers can access them easily. At the same time, Ofgem should also make that information available on its website.

Best Regards,

TungHing Sum

Policy Researcher Citizens Advice

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