

DISTRIBUTION PERFORMANCE REPORT
2008



Prepared by:
Distribution System Operator
ESB Networks Ltd.
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Introduction

Condition 13 of the Distribution System Operator (DSO) licence requires the DSO to report annually on the performance of the Distribution Business. The criteria to be reported upon have been approved by the Commission for Energy Regulation (CER) in accordance with Condition 13 of the DSO licence.

http://www.esb.ie/esbnetworks/download_documents/reports_codes.jsp

This report has been prepared by the DSO for the year ending December 2008.

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Criteria

The report covers the performance of the Distribution Business for the year ending December 2008 under the following headings:

- 0.0 Publication, Review and proposed revisions to this report
- 1.0 Customer Service
- 2.0 Cost Performance
- 3.0 Achievement of capital programme
- 4.0 Supply Quality & Reliability
- 5.0 Safety
- 6.0 Market Services
- 7.0 Improvements in 2008
- 8.0 Access to Land and/or Premises
- 9.0 Service Level Agreements
- 10.0 Records and Reporting
- 11.0 Compliance with licence requirements

0. Publication, Review and proposed revisions

0.1 Publication of report on ESB Networks Ltd. website:

In compliance with Conditions 13 & 17 of the DSO License this Performance Report will be published on the ESB Networks Ltd. Website at the following link :

http://www.esb.ie/esbnetworks/download_documents/reports_codes.jsp

0.2 Recent review of performance criteria and recommended revisions:

The following revisions to the report are hereby proposed:

a) We propose a new format for the Performance Report to include statements on compliance with “Condition 17 – Records & Reporting”

b) For the purpose of providing extra information on the progress of Capital Programmes we propose that Table 4 in Section 3 should include the following:

3.8 MV Substations Asset Replacement in 2008

3.9 20kV Conversion (km) in 2008

3.10 Embedded Generation in 2008

c) The measures used in previous years for reporting the performance in relation to SLA 15 – QH Data Collection, are no longer the most accurate. We propose 2 new measures to be used to report the performance for 2008, these are recorded under SLA 15A & 15B in Section 9.0 of this report.

1.0 Customer Service

Critical indicators of customer service performance include service delivery by the Customer Contact Centre (located in Cork) and the treatment of complaints by staff of the DSO. Table 1 summarises the performance of some of the key indicators of customer service in this area.

TABLE 1. CUSTOMER SERVICE KEY INDICATORS

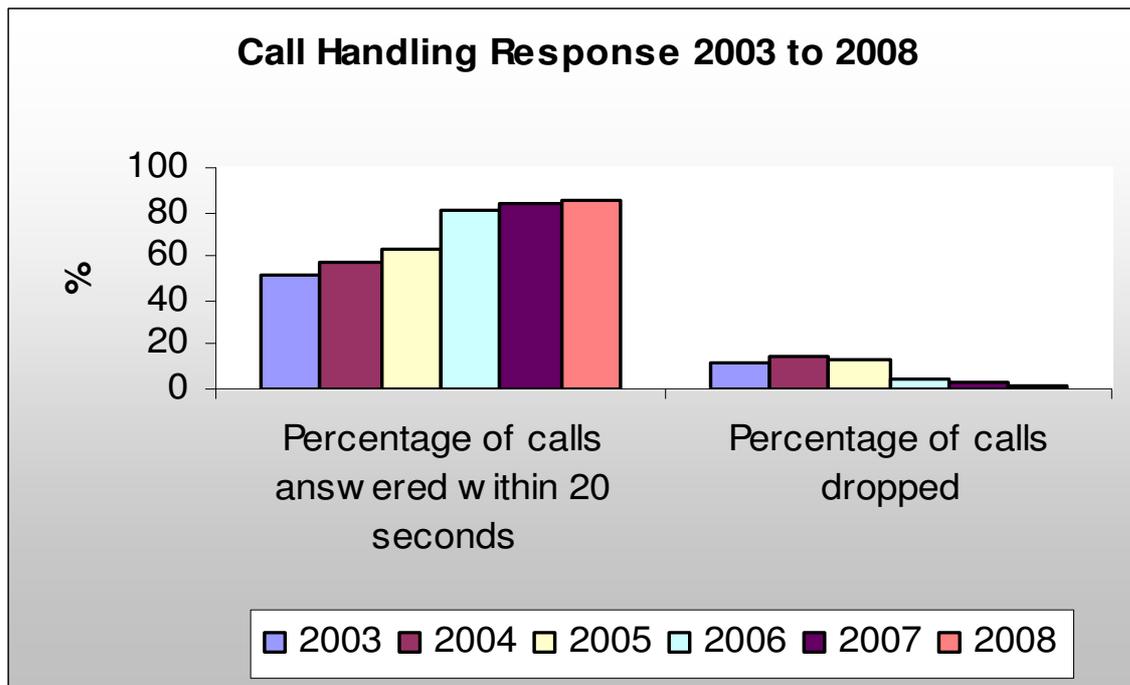
NO.	Description of Criteria	Value
1.1	Call Handling Response¹	
1.1.1	Percentage of calls answered within 20 seconds	85.60%
1.1.2	Percentage of calls dropped ²	1.70%
1.1.3	Networks customer calls to the call centre	809069 ³

Graph 1 shows the trends in Call Handling Response since 2003. The percentage of calls answered within 20 seconds has continued to improve each year and the percentage of calls dropped has continued to reduce each year.

¹ Note both sets of figures are inclusive of storms, which has the effect of reducing the percentage of calls handled and increasing the percentage of calls dropped.

² Where the customer has hung up without waiting for a response.

³ The exact number of calls relating to ESB Networks Ltd. issues are identified. In previous years calls relating to Networks issues were reported as a percentage of total calls to the Contact centre.



Graph 1

Customer Performance Report 2008

The Distribution System Customer Service Code, Complaints Handling Procedure and Disconnection Code of Practice have been submitted to the Commission and subsequently approved by them. They are published by ESB Networks Ltd. on our website as follows:

- Distribution System Customer Service Code www.esb/esbnetworks/about_us/customer_charter/customer_charter.jsp
- Complaints Handling Procedure www.esb/esbnetworks/about_us/complaints.jsp
- Disconnection Code of Practice www.esb/esbnetworks/downloads/revised_de-energisation_code_of_practice_june_06.pdf

1.2 Customer Service Code

1.2.1 Customer Service Code (Arrangements)

ESB Networks Ltd. strives to provide services to a high level of quality and in a timely fashion to meet customer requirements and is committed to making service excellence a priority in all customer dealings, in particular in the areas of Telephone Response, Restoration of Supply Outages and meeting the 12 Service Performance Guarantees in our Customer Charter.

ESB Networks Ltd. work management systems are designed to capture the time of initiation of all customer service requests and the time of completion of same. The response time to complete every activity is subsequently calculated and management reports issue monthly to line managers to monitor service delivery. ESB Networks Ltd.'s work management systems will automatically compare the actual response time for every service against the Customer Charter service levels and will automatically generate a Charter Default if the response time exceeds the target service delivery. All Charter defaults are screened to filter any cases where ESB Networks Ltd. is not responsible for the failure to meet the Customer Charter. Charter Payments will automatically issue to our customers in respect of all remaining charter defaults.

ESB Networks Ltd. is presently implementing a number of customer service initiatives to ensure that the interests of vulnerable customers on life support equipment are protected. These initiatives include caller identification for priority telephone access and a database to ensure 'Life Support' customers cannot be de-energised through the disconnection for non-payment process.

1.3 Complaints Handling Procedure

1.3.2 Complaints Handling Procedure.(Arrangements)

ESB Networks Ltd. employs a simple and effective complaints handling procedure to support quick and efficient resolution of problems.

The complaints procedure encourage initial complaints to be submitted via three channels - by ringing a dedicated phone line in our Customer Contact Centre, by email to a dedicated email address or in writing through the local ESB Networks Ltd. Office. Full details of ESB Networks Ltd. complaints procedure and the above contact points are published on our web site at the following link:

http://www.esb.ie/esbnetworks/about_us/complaints.jsp#complaint

Staff in our Customer Contact Centre and local management is empowered to resolve complaints promptly and our target is to respond to 92% of all complaints received through these channels within 5 working days. ESB Networks Ltd. Complaints Facilitator produces a monthly management report to monitor the volume of complaints received and our response performance in relation to these complaints.

Table 2 gives a breakdown of the complaints received over the year 2008 with Graph 2 giving a graphical representation of the figures thereafter.

TABLE 2 COMPLAINTS⁴ AND NO. OF TERMINATIONS AND DE-ENERGISATIONS

No.	Description of Criteria	Number
1.3	Complaints received	Number
1.3.1	Concerning low voltage	144
1.3.2	For frequent outages	1,605
1.3.3	Time to connect customers	71
1.3.4	Operation Delays and Overruns	112
1.3.5	From Suppliers	0
1.3.6	On connection costs and budget quotations	49
1.3.7	On Meter reading and Estimated reads	1,278
1.3.8	Others	1,159
1.4	Total complaints received in 2008⁵	4,418
1.5	Connection points terminated⁶	1,672
1.6	Connection points de-energised⁷	10,682

Note that two of the categories have been altered from previous years:

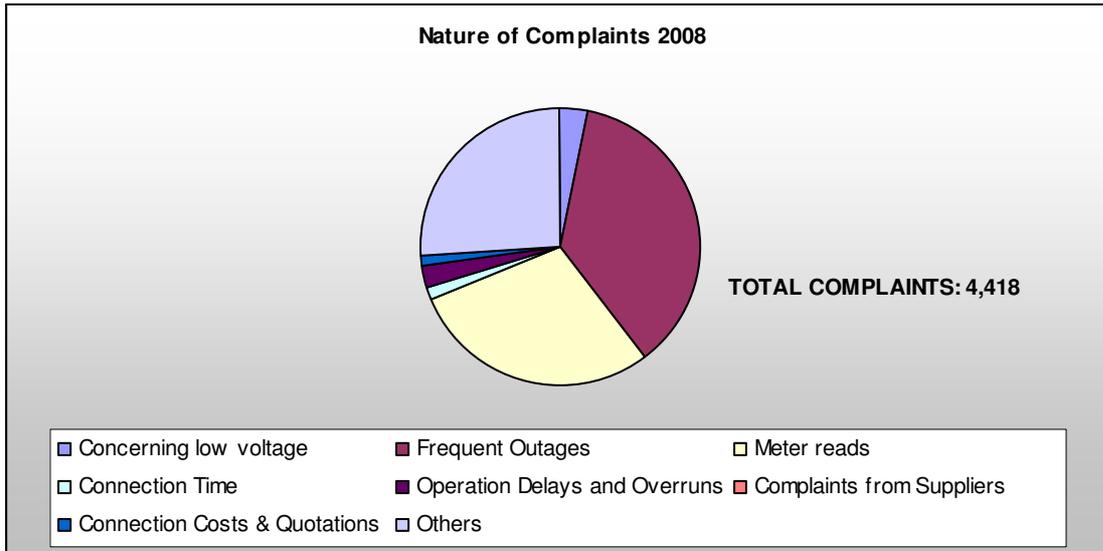
- 'Other Distribution Services' is now described as 'Operation Delays and Overruns' as this is a more accurate description of the complaint types in this category.
- The category: 'Relating to Supply Quality' covers complaints concerning supply quality. Previously the number of Customer Reports of problems relating to Voltage Quality was incorrectly included under this heading. This quantity is covered in Table 8 below.
- An "Others" category has been added, this figure represents all other complaints that are not included in categories 1.3.1 to 1.3.7

⁴ Please note, complaints specifically relate to queries which cannot be resolved in the area in which they have arisen, but instead have to be referred to another party – either within ESB Networks Ltd., or an outside party

⁵ Includes extra categories

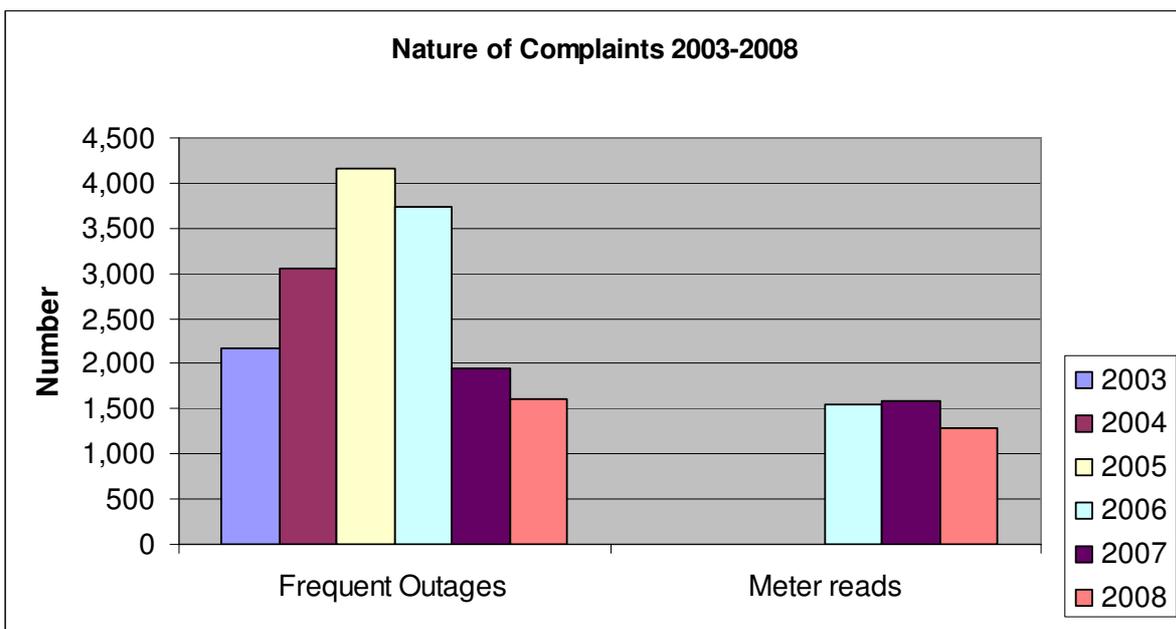
⁶ These are connection points in vacant premises that have been terminated following previous de-energisation and de-registration.

⁷ De-energisation for non-payment.

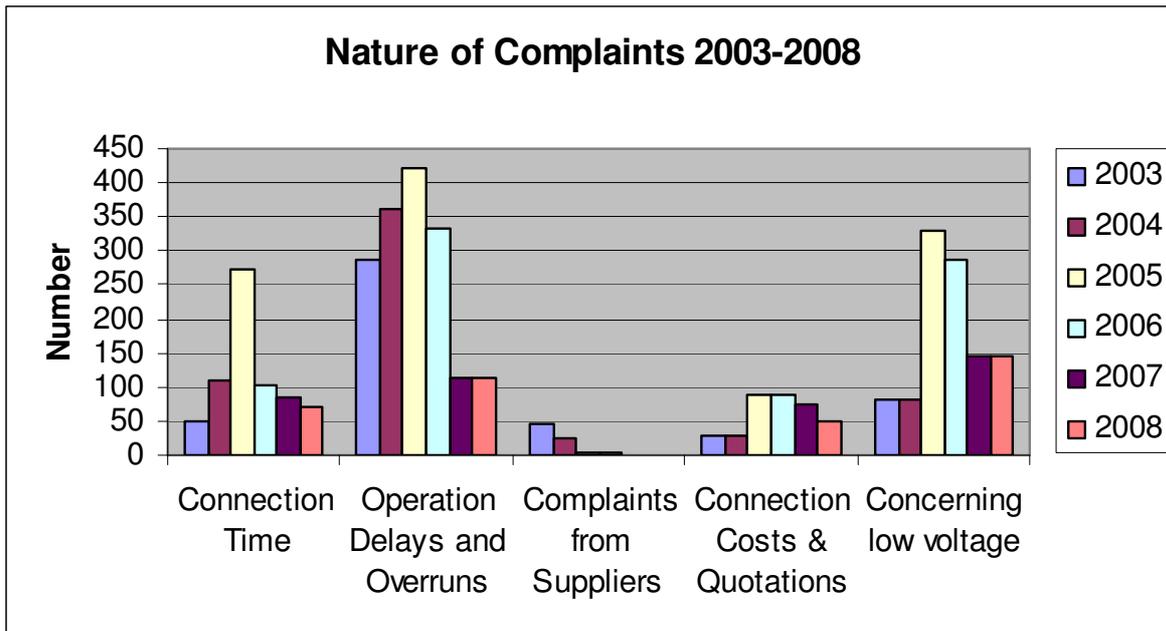


Graph 2

Graphs 3 and 4 indicate the trends in numbers in the main categories of service complaints received over the 6 year period 2003 to 2008.



Graph 3



Graph 4

As can be seen in graph 3 and 4 the no. of complaints in each category was lower in 2008 than they were in 2007.

The no. of supply quality complaints continues to reduce due to continued investment in the LV refurbishment programme.

There has been a major improvement in complaints relating to frequent outages due to increased focus on Live Line Working and the introduction of Standby Generators to contain and minimize the amount of network disconnected.

The no. of complaints relating to the Time to Connect customers, Other Distribution Services and Connection Costs and budget quotations have all reduced in 2008, this is partly due to the decline in Economic activity and the consequent reduction in the backlog of work.

The no. of complaints relating to Meter Reading and Estimated Reads⁸ reduced by 17% in 2008 this was due to increased focus and activity in this area including the appointment of additional meter readers.

⁸ Please note meter reading complaints have only been separately reported since 2006

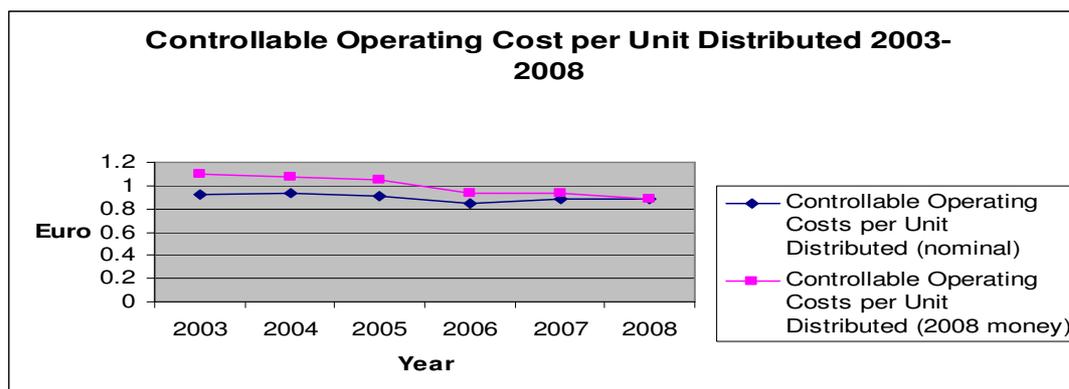
2.0 Cost Performance

The Commission for Energy Regulation has set targets for operating expenditure and the DSO aims to achieve these and, where possible, improve on them. Table 2 (below) summarises the DSO's performance in 2008 in relation to two key cost criteria.

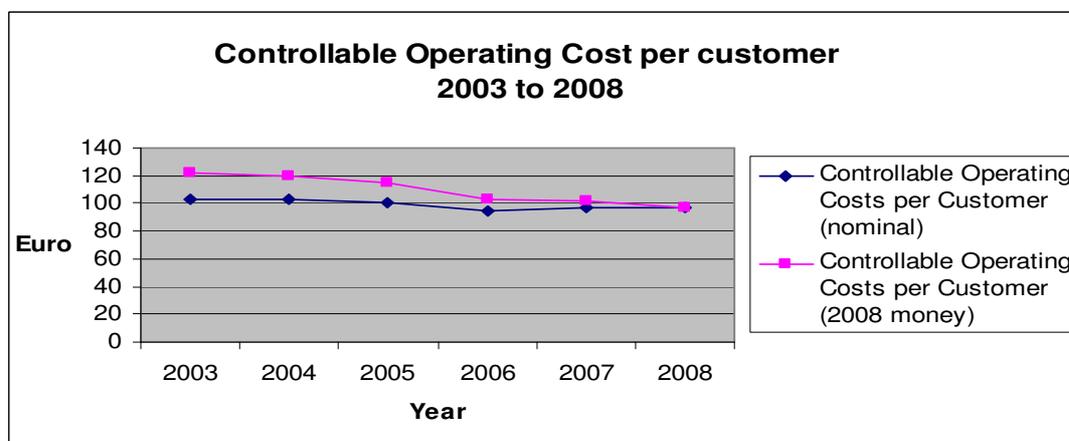
TABLE 3. COST PERFORMANCE

No.	Description of criteria	2008 Value
2.1	Controllable Costs	
2.1.1	Controllable Operating Cost per unit distributed	€0.89 / kWh
2.1.2	Controllable Operating Cost per customer	€97.14 / Customer

The aim is to keep these Controllable Costs as low as possible whilst maintaining the operational integrity and efficiency of the Networks. Graphs 5 and 6 below show the real and nominal values of Controllable Operating Costs per Unit Distributed, and per Customer. The graphs show that in real terms these costs have been reducing since 2003.



Graph 5



Graph 6

3.0 Achievement of capital programme

The DSO agreed an extensive capital programme with the Commission for Energy Regulation for completion over the period 2006-1010. This program included:

- Low Voltage (LV) refurbishment Programme.
- Replacement of High Voltage (HV) cables in Dublin City.
- Extensive Load Reinforcement Programme
- Completion of the MV Overhead Line Refurbishment Programme
- Rebuild and refurbishment of 50's copper 38kV lines.
- MV Substations Asset Replacement

Some key indicators of the DSO's performance in 2008 in relation to its overall capital programme are summarised in Table 4.

TABLE 4 PROGRESS OF CAPITAL PROGRAMME

No.	Description of criteria	Value	Progress Comment (In relation to 2006-2010 Targets)
3.1	Total Capital Investment Programme		
3.1.1	Capital Investment Programme (2006-2010) achieved to date (%) (i.e. percentage of allowed capital spent)	49%	Distribution Capex Delivery is at 49% at the end of 2008. The make up of this is as follows: <ul style="list-style-type: none"> • NRP has been fully delivered • 58% of Reinforcement. • 29% of LVR • 36% of Asset Replacement
3.2	LV Refurbishment Programme		
3.2.1	Groups completed in 2008 (no.)	9,099	On Target
3.3	LV Urban Programme		
3.3.1	Spans completed in 2008 (no.)	1,740	See Comment below
3.4	HV Cable Programme		
3.4.1	110kV gas filled cable replaced in 2008 (km)	Completed by 2007	Completed
3.4.2	110kV ducting for oil filled cable replaced in 2008 (km)	3.8	3.8km completed, an additional 2.5km to be completed by 2010

TABLE 4 PROGRESS OF CAPITAL PROGRAMME

No.	Description of criteria	Value	Progress Comment (In relation to 2006-2010 Targets)
3.5	New stations Constructed in 2008⁹		
3.5.1	110kV stations (no.)	4	On track to deliver the overall capacity target
3.5.2	38kV stations (no.) - new - expansion of existing 110kV station - rebuild of 38kV station	3 1 2	
3.6	Stations uprated in 2008		
3.6.1	110kV stations uprated (no.)	5	
3.6.2	38kV stations uprated (no.)	12	
3.7	Rebuild & Refurbishment of 50's copper 38kV line in 2008	118km	On Target
3.8	MV Substations Asset Replacement in 2008		
	1. Metrovicker Units (no.)	2.0	On Target
	2. Oil-filled Switchgear Subs (no.)	28	On Target
	3. Cast Resin Kiosks (no.)	138	On Target
3.9	20kV Conversion (km) in 2008	5,252	On Target
3.10	Embedded Generation in 2008		
	No. of Windfarms Connected	8	1,005 MW have been connected, with an additional 1,420 in progress
	Total MW Connected	75.14	

⁹ These are stations constructed but not necessarily commissioned in 2008

LV Urban Programme:

The LV Urban Programme has been delayed due to discussions with the local authorities on the replacement of their Public Lighting Lanterns which share the same poles as the LV Urban Networks. A solution has recently been agreed between ESB Networks Ltd., CER and CCMA (City & County Managers Association), due to this factor the LV Urban Programme for PR2 has been delayed.

4.0 Supply Quality and Reliability

Supply reliability is an essential aspect of distribution system performance. The total number of interruptions to supply is given in Table 5 and the trend over the past 6 years is shown in graph 7.

TABLE 5 NUMBER OF OUTAGES BY CONNECTION VOLTAGE

No.	Description of criterion				Value	
4.1	Number of Outages ¹⁰(> 1 minute duration)					
	Voltage	Urban customers¹¹		Rural customers		Total
		Fault¹²	Planned	Fault	Planned	
	LV	7693	36	16562	1037	25328
	10kV	1493	759	6547	4591	13390
	20kV	217	200	1826	1428	3671
	38kV	14	0	51	0	65
	> 38 kV					
	UNKNOWN	38	29	101	111	279
	Total exc Storm Days and Major Renewal Programmes	9455	1024	25087	7167	42733

¹⁰ Short interruptions lasting less than one minute are not included. In some fault situations, there can be a number of temporary supply restorations followed by an interruption before supply is permanently restored. One interruption per customer affected is recorded in these situations. The figures do not include customer outages which resulted from problems on the Transmission System, e.g. operation of under-frequency relays.

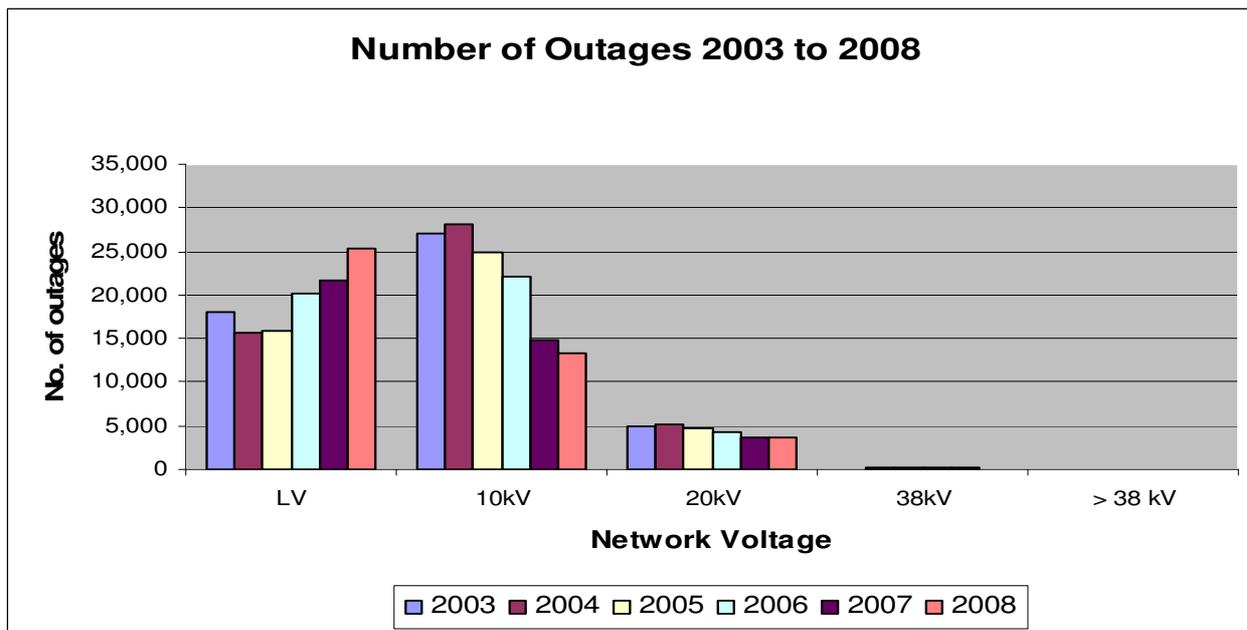
¹¹ For continuity monitoring purposes, ESB Networks Ltd. defines the cities of Dublin, Cork, Limerick, Galway and Waterford as urban areas. Other areas including provincial towns are classified as rural for continuity purposes.

¹² Fault data does not include outages on major storm days

In an overall context, the number of outages has increased in the period 2004-2008, this growth has been driven by the corresponding rise in the volume of LV outages since 2004. This increase in LV outages is believed to be due in part to the following factors:

- **Improved Reporting:** It is believed that customers are making greater use of the ESB Networks Customer Contact Centre to report faults. In previous years some faults affecting small numbers of customers may not have been recorded in all cases and customers instead made direct contact with locally based ESB Networks staff. This is believed to have applied in rural locations particularly.
- **Prioritisation of Timber Cutting:** A further reason for the increase in the number of LV faults is that since 2004 a greater proportion of the timber cutting budget has been allocated to MV Networks. It is believed that this has contributed to the overall improvement in continuity in rural areas as a fault on MV Networks will generally affect a much greater number of customers than a fault on LV Networks.
- **Network Condition:** The LV networks are generally in a poorer condition than our MV networks. We have commenced with our LVR & LVU refurbishment programs however as both programs are designed to run over consecutive Price Reviews, the refurbished networks as a percentage of the total is relatively low.

Graph 7 indicates that the number of MV outages has reduced substantially over the past 5 years. This improvement is due to a number of factors including the MV overhead line refurbishment programs, the increased use of live working techniques at MV, improved outage management and the reduction in new business volumes.



Graph 7

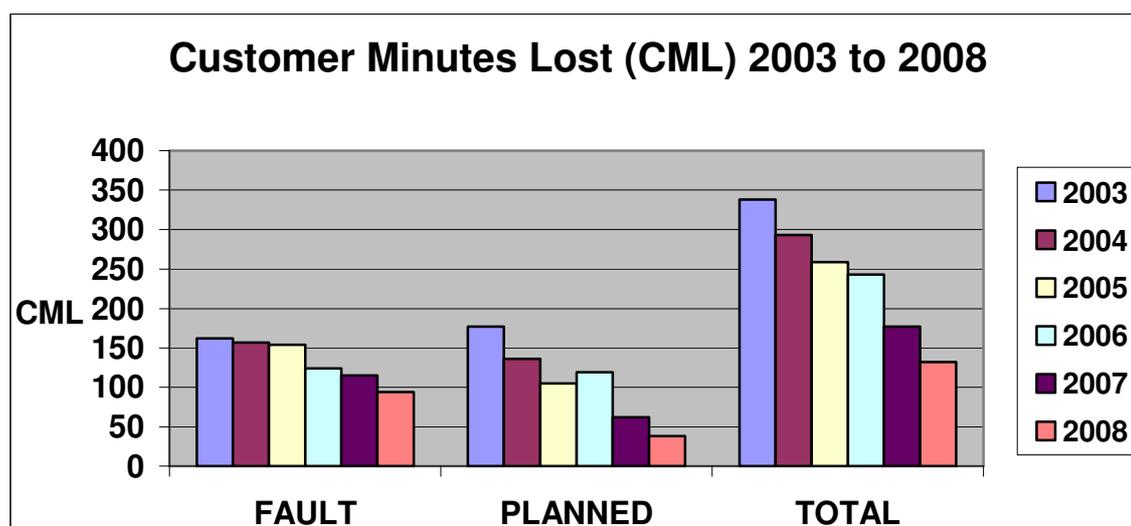
The impact of outages on customers across the entire distribution system is measured by two parameters; average number of interruptions per customer connected in the year (CI) and the average number of minutes without supply per customer connected in the year (CML). CER has set targets for CI and CML for the period 2006-2010. CER has incorporated an incentive/penalty scheme in the DSOs revenue control formula whereby ESB Networks Ltd. is allowed to recover more or less additional use of system revenues depending on performance against those targets. As the effects of severe weather can cause wide variations in these measures which is outside of ESB Networks Ltd. control, there is an adjustment for storms days¹³

¹³ Storm days are days where the reported customer hours lost due to faults is greater than 61,570. 61,570 was the average of two standard deviations from the mean of the daily fault data for the 3 years 1999,2000, and 2001. Fault data for storm days is excluded and fault statistics are then annualised to 365 days. For example if 12 days are excluded because CML exceeded 61,570, the remaining data is annualised by applying the factor $365 / (365 - 12) = 1.034$.

Table 6 Continuity – Customer Minutes Lost (CML) weighted average

No.	Description of criteria	Value		
4.2	Customer Minutes Lost			
		Fault	Planned	Total
	Total (including Major Renewal Programmes)	94	61	155
	Major Renewal Programmes	-	23	23
	Total (excluding Major Renewal Programmes)	94	38	132

Overall performance has been within target, this is as a result of significant improvement initiatives. Major renewal programmes are programmes carried out under the price determination such as the MV overhead network renewal programme, 20kV Conversions and LV Renewal programme which have a significant effect on improving reliability. Outages arising from these work programmes are included in the reported figures and are reckonable in the incentive/penalty scheme. In order to show the long term underlying trend the graph below excludes the effect of these major renewal programmes.



Graph 8

The Customer Minutes Lost have been improving year on year through a number of initiatives which were implemented. The reduction of Customer Minutes Lost on MV Networks is due to the investment in the refurbishment of the medium voltage networks and the deployment of downline automatic reclosers and switches which can be operated remotely from the two SCADA Control Centres. These have the effect of reducing the number of customers affected by faults and permit faster restoration of supply. Planned outage performance was improved through limiting outage duration for certain types of work to four hours, carrying out live-line working where possible and effective work management/scheduling for planned outages.

Table 7 details the weather conditions on the five storm days in 2008.

Table 7. Storm Days

Description of criteria	Value
4.4 Storms and exceptional events 4.4.1 Storm days (no)	5
4.4.2 Description of storm days¹⁴ <u>8th January 2008</u> Strong winds and rain. 75,340 customers affected <u>9th January 2008</u> Strong winds and rain. 40,720 customers affected <u>10th March 2008</u> Wind and Rain Gusting in excess of 100kmh. 35,998 customers affected <u>11th March 2008</u> Wind and Rain Gusting in excess of 100kmh. 58,859 customers affected <u>12th March 2008</u> Wind and Rain Gusting in excess of 100kmh. 64,576 customers affected	

¹⁴ As per previous footnote, a storm day is defined as a day in which the reported customer hours lost due to fault exceeds 61,570.

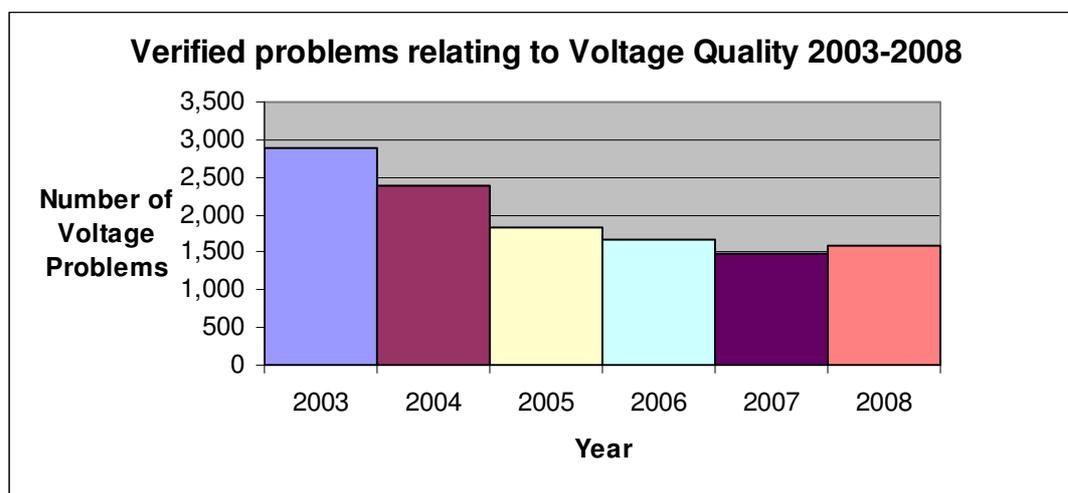
TABLE 8 FAULTS EXCEEDING 4 HOURS DURATION AND VOLTAGE QUALITY PROBLEMS

No.	Description of criteria	Value
4.3	Additional items	
4.3.1	Percentage of faults exceeding 4 hours restoration time ¹⁵	18.6%
4.3.2	Customer Reports of problems relating to Voltage Quality	3,447
4.3.3	Verified problems relating to Voltage Quality	1,586 ¹⁶

The Percentage of faults exceeding 4 hours restoration time have shown a slight decrease on last years figure of 18.8% .

The No. of Customers that reported problems relating to voltage quality reduced from last years figure of 3635, the figure of 3447 in 2008 was a 5% reduction on 2007 and arises due to continued investment in the LV refurbishment programme. The no. of voltage quality requests are not categorized as service complaints but are essentially requests for a technical investigation of possible voltage problems.

Graph 9 illustrates the trend in verified problems relating to Voltage Quality from customers. The volume of these complaints during 2008 show a marginal increase on the 2007 figure. There does not appear to be any underlying reason for this change.

**Graph 9**

¹⁵ As with previous outage statistics, this figure does not include outages due to major storms.

¹⁶ Verified problems relating to Supply Quality are where the local area has determined that – following a customer complaint – the voltage at the customer location is outside standard. The voltage will be measured on load as part of a visit to the premises, and the Network Technician will examine the general group design. In the event that these checks are inconclusive, a voltage recorder will be installed.

5.0 Safety

There was one fatality due to contact with electricity in 2008. This occurred when a man operating a lorry-mounted crane on a farm construction site made contact with an overhead 10kV line that was crossing the site.

In addition to the one fatality in 2008 there were also four people who received injuries as a result of contact with electricity networks on the supply side of the meter.

Public Safety Initiatives 2008

A number of significant public safety initiatives were undertaken in 2008 which includes the following: Work was completed on the development of a new “ESB Networks Code of Practice for Avoiding Danger from Overhead Electricity Lines” with the assistance of the Health and Safety Authority. This Code of Practice received statutory approval from the HSA and the Minister for Labour Affairs.

Presentations on the content and implications of the new Code of Practice were delivered to seven construction related seminars during 2008.

Progress was made in conjunction with the Health and Safety Authority on the development of guidelines on “Safe Working near Overhead Lines in Agriculture”.

ESB Networks Ltd. made significant input into the development and delivery of a schools safety programme being piloted by the Health and Safety Authority. This “Keep Safe” programme was delivered to fifth and sixth class pupils in 8 schools in Donegal.

- Other public safety initiatives undertaken in 2008 included the delivery of a national public safety awareness campaign through:
 - Advertising in the National and technical press.
 - TV advertising in the national agricultural livestock marts.
 - Broadcasting of full range of public safety radio advertisements on the vast majority of the local (28 no.) and national (3 no.) radio stations.
 - Provision of stands at Agriculture and Construction Machinery shows and safety Conferences.
 - Direct mailing of safety packages to all sailing clubs advising on the dangers of contact with overhead lines.

Table 9 shows the number of dangerous occurrences associated with the networks infrastructure during 2008. These figures are broken down as third party damages¹⁷ and non-third party notifiable fault incidents¹⁸.

TABLE 9 DANGEROUS OCCURRENCES

No.	Description of criteria	Value
5.1	Number of safety incidents	
5.1.1	3 rd Party Plant Damages (excluding underground cable Dig-Ins)	260
5.1.2	3 rd Party Plant Damages caused by underground cable Dig-Ins	1,114
5.1.3	Non 3 rd party – MV and 38kV notifiable fault incidents (e.g. line drops)	206*
5.1.4	Non 3 rd party – LV notifiable fault incidents	968*

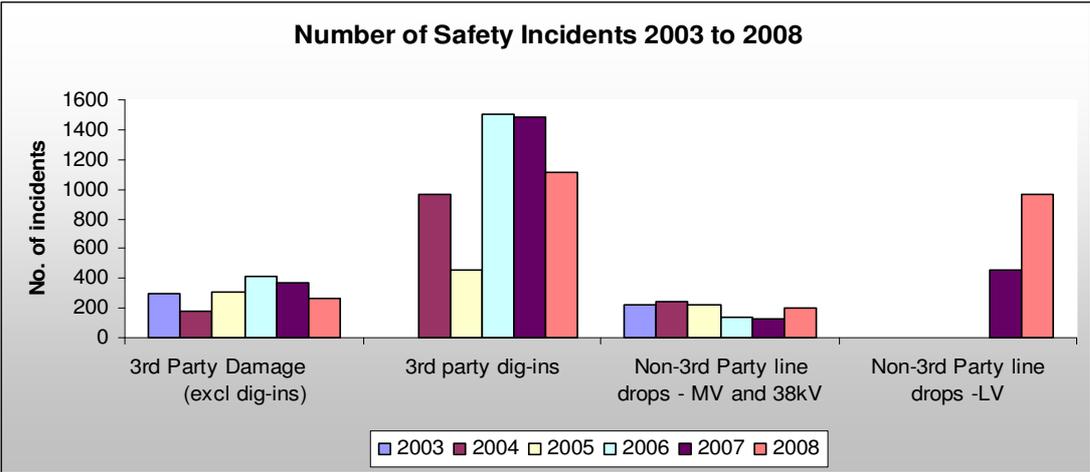
* This data is based on the first full year of records for the new OMS¹⁹ (Operations Management System) fault recording system and is not directly comparable with previous year's data. It includes incidents of reduced clearances which were not captured on the earlier TCM²⁰ (Trouble Call Management) System and the structure of the new system also has forced more comprehensive overall reporting. These improvements in reporting are the reason for the increase in the number of MV and 38kV notifiable incidents in 2008. The increase at LV is also a result of improved reporting, coupled with an overall increase in the level of faults. For a more detailed explanation of the increase in LV faults refer to Section 4 Supply Quality and Reliability.

17 Third party damages are incidents where third parties cause damage to the networks infrastructure. These are broken down into incidents that involve damage to underground electricity cables termed 'Dig-Ins' and incidents that cause damage to other plant such as overhead lines, minipillars and substations. There is a public safety risk of injury arising from third party damages principally to the persons involved in the activity that causes the damage e.g. digging/excavation in the case of underground cables or the operation of high reach plant in the case of overhead lines. The direct costs associated with the repairs of third party damages are invoiced to the party responsible for causing the damage. A large unrecoverable consequential cost of third party damages is the disruption caused to consumers due to the supply interruption and loss of electricity supply.

18 Non-third party notifiable fault incidents are principally incidents on the overhead lines networks where an overhead line conductor/wire falls e.g. in stormy conditions or due to corrosion or other plant item failure. Such incidents carry a public safety risk and ESB Networks Ltd. are required under Health and Safety legislation to notify the Health and Safety Authority of these incidents.

19 Operations Management System (OMS) is a computer database that records all LV and MV planned outages and fault incidents that result in a loss of supply to customers e.g. arising from various causes such as plant item failures due to rot/corrosion, major storms, third party damages, timber etc.

20 Trouble Call Management (TCM) system. Old computer database that has been replaced by OMS.



Graph 10

Please note Non-3rd Party Line Drops-LV have only been separately reported since 2007

6.0 Market Services

Condition 17 of the DSO Licence states that the Licensee shall keep a record of its general operation of the arrangements mentioned in Conditions 7, 8, 9, 13, 14 and 15 and, if the Commission so directs in writing, of its operation of any particular cases specified, or of classes specified, by the Commission. Condition 7, 8 and 9 relate to Market Services and the records of their general operation that are kept by ESB Networks Ltd. are as follows:

6.1 Provision of Metering and Data Services

6.1.1 Salient business and transaction data were maintained on the services provided under Condition 9 of DSO license Provision of Metering and Data Services. These services include, Provision of Metering Equipment, Installation, Commissioning, Testing, Repair and Maintenance of Metering Equipment and Data Collection.

6.2 Meter Point Registration Service

6.2.1 In compliance with license condition 8 records were kept in respect of the Meter Point Registration Service i.e. of MPRN, identity of the Supplier, Meter Class, premises address and other information required for Change of Supplier.

6.3 Detection and Prevention of Theft of Electricity

6.3.1 In compliance with license condition 7 records were kept in respect of incidents where theft of electricity was suspected or where there was interference with Metering Equipment and that these incidents were reported to the Supplier.

7.0 Improvements in 2008

Customer Service

ESB Networks Ltd. delivered significant improvements in Customer Service performance in the first phase of its 2006-2010 Customer Service Improvement Plan. It is now building on this with the goal of achieving Customer Service Excellence in the second phase. By devoting the required resources to ensure consolidation of the higher performance levels achieved in 2006 /'07, a further improvement in service was delivered in 2008 and is reflected through a number of achievements:

- A reduction of 40% was achieved for the number of charter payments made to customers in 2008 compared to 2007.
- Achievement of a new low in Customer Minutes Lost (CMLs) at 155 No., a reduction of 39 No. (i.e. 20%) on the previous year.
- Performance in the National Customer Contact Centre continued to improve in both call answering and call abandon rates, with results of 85.6% and 1.7% respectively being achieved in 2008.
- Overall customer satisfaction with Contact Centre handling of Networks' enquiries increased a further two percentage points in 2008 to a very high level of 81%.
- The full roll out of the Mobile Data Management technology during 2008 meant that our technicians now receive customer service work orders in the field. This gives a quicker response time and accurate and timely updating of customer information.
- There was an overall average reduction of 12% in the volume of customer complaints over the twelve months of 2008.
- 5,723 jobs were undertaken using live working techniques delivering a saving of approx. 7.3m customer hours lost due to planned outages.

Mobile Data Management Rollout

During 2008 Customer Services rolled out Mobile Devices to 350 Network Technicians (NTs) across all locations in the country. The mobile devices allow Network Technicians to record meter service call information²¹ on a hand held device. This process covered all types of meter service calls. As a result of the rollout, 75% of all meter calls are now completed electronically on site. This has cut down on paper information that has to be sent through the postal system with its inherent delays and also allows for the information to be updated on our database almost immediately upon physical completion of the job. Within 6 months of operation, the new process has meant a much improved service to suppliers. In addition, 80,000 fewer A4 pages were printed out. This will be an ongoing saving. It is planned to increase the number of the devices so that the details from over 80% of all meter service calls can be updated electronically on site by the Network Technicians.

Renewable Generation

Gate 2 offers were completed with all offers issued by September 2008. As of October 2009 there have been 44 Modification requests in relation to Gate 2 offers and Modified offers had been issued to 30 of these.

In preparation for Gate 3 the following improvements were proposed to CER in response to requests from the wind industry:

- A new losses policy was put in place for dedicated connection assets. Under the new policy losses are no longer considered as a technical criteria in the determination of the Connection Method.
- In the interests of improved customer service, DSO will be meeting with customers pre-offer issue to set out the connection method to be offered and address any customer queries in relation to same.
- Subject to certain conditions and time constraints, distribution connection generators will have the option of opting for a cable (underground) connection pre offer. This will prevent the delays and costs associated with requesting a modification post offer issue.
- Developers will be given the option of proposing a connection method which they deem appropriate for their sub-group as a whole. This method will be offered only if it is the most economic, technically acceptable method or if all customers affected agree.

Following significant input from DSO including the above, CER published their Gate 3 direction outlining which renewable generators would be included in Gate 3 and the criteria for processing Gate 3.

²¹ Meter service call information refers to any details that a Network Technician records about a customer's electricity meter and any work carried out during a call out to the customer's site.

PAS 55

ESB Networks Ltd. received accreditation to PAS 55 in July 2008. This is a major milestone for ESB Networks Ltd. in the pursuit of its strategic goal of achieving excellence in Asset Management. It is the first time that an Irish company has achieved accreditation to this standard.

PAS 55 is a publicly available specification produced by the British Standards Institution. It is a specification for a Management System designed for companies who manage significant physical asset bases. It involves a stringent process of assessment which benchmarks best international practice in asset management. For example, OFGEM, the UK Energy Regulator, has required all of the Distribution Network Operators in UK to achieve accreditation to this standard by June 2008.

The accreditation audit was carried out in two phases by Lloyds Register, UK. The focus of stage 1 was on ESB Networks Ltd's. Asset Management Department. Over the course of Stage 1 a full audit was carried out of our Asset Management Policy, Strategy and our detailed Network Plans with emphasis on the robustness of our investment appraisal processes and a particular emphasis on risk management. The audit confirmed that quality processes were in place to ensure that optimum investment decisions are made and that these decisions are kept under continuous review.

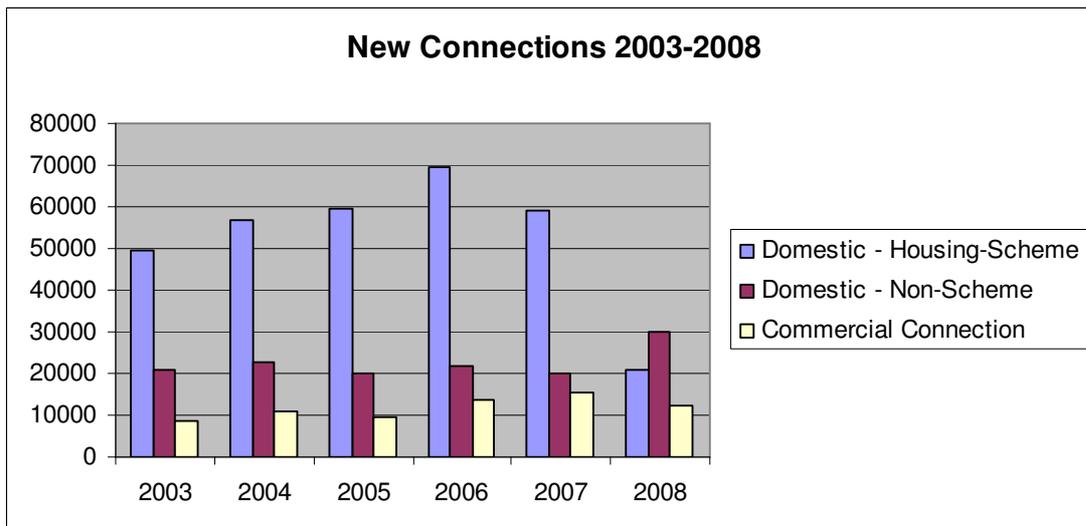
Stage 2 of the audit followed a total of sixteen processes in the Networks business from end to end. These ranged from the planning and construction of a new 110KV to MV station to the connection of both urban and rural customers. All of our major programmes were also covered including 20KV conversion, LV Renewal, HV Cable replacement, timber clearance, Siemens lines and stations replacement/refurbishment and MV substation maintenance. Our process for handling faults, both urban and rural was also audited as was our system for carrying out both safety and quality audits. Our training school in Portlaoise including our HV test facility was audited also. The focus of Stage 2 was to confirm that systems were in place to ensure that assets were built to the required quality standard, whether delivered by our own staff or by contractors, and were fit for purpose

Stage 1 and Stage 2 of the audit were very successful and the Lloyds auditors recommended ESB Networks Ltd. be awarded a certificate against the requirements of BSI PAS 55-1:2004.

Achievement of accreditation to PAS 55 is an external validation that our processes, systems and work delivery are at best international standard.

New Connections

In 2008 a total of 63,099 new connections were completed by ESB Networks Ltd. This was a decrease of over 31,000 on 2007, and reflected the general economic downturn. Indications are for a further drop in new connections in 2009. Our current prediction is that there will be 35,000 for the year.



Graph 11

Operations

- During 2008 SCADA (System Control and Data Acquisition) installation was completed in a further nine 110kV stations and three 38kV stations. SCADA coverage is now at 96% for 110kV stations and 90% for 38kV stations. SCADA provides powerful centralised facilities for remote monitoring and operation of substations. Its benefits include significantly improved operating performance, supply reliability, safety and customer service.
- Further rollout of the Distribution Automation Project continued with a further 343 automatic network switches and reclosers installed bringing the total number installed and remotely controlled from SCADA to 895.
- The rollout of centralised control of the medium voltage (MV) distribution system into the two Distribution Control Centres has commenced with Killarney & Drogheda Areas. The programme will be completed for the remaining Areas over the next 18 months.
- Work commenced on the upgrade of the SCADA system to Network Manager 3. The upgrade will be completed by the end of 2009.
- The 38kV LBFM (Load Break Fault Make Switch), sourced to replace the 38kV ABS (air break switch) on the 38kV overhead network, has undergone Risk Assessment and are currently being installed. This device is also being fitted with a remote control facility to allow it to be fully controllable from SCADA. The initial unit has been installed and commissioned for a windfarm connection in Co Cork.
- There were 47 operational incidents reported in 2008 at MV and HV where supply was lost to customers either inadvertently as a result of 3rd party coming in contact with network, failure of plant or through operational error when operating the plant. This is in line with 2007 outcome of 47 incidents. A minor injury occurred to a member of staff when, during a fault voltage, was transferred to the cable screen he was working on.
- Good progress was made on the prototype testing of alternative methods of treating the neutral on the 20kV system. A Faulted Phase Earthing system is being tested in Kilmacthomas and the Arc Suppressed System is being trialled in Baltinglas. These systems have the potential to reduce the number of outages.
- A daily next day outage report was developed. This is circulated to local management highlighting all significant fault and planned outages that occurred during the previous day including all unrestored planned outages and a 7 day rolling report to allow users to verify outage details. This has led to a significant improvement in the accuracy of reporting of customer outages.
- A monthly extract process was developed for publishing raw outage data on a shared drive available to users on an as-needed basis. This data forms the basis of quarterly reports, balanced scorecard, annual and regulatory reports.

- The Outage Management System was updated to interface to the new implementation of customer to network referencing (LINK) on SAP IS-U. Customer to network referencing is a key element that facilitates acting to address likely network problems based on customer calls. The SAP IS-U LINK solution provides a greatly enhanced replacement for the legacy LINK referencing solution which was based on AREAS. The IS-U LINK solution went live in Oct'08 and has bedded in successfully. IS-U LINK has essentially two elements - 1) asset life cycle scenarios for MV substations and outlets which are synchronised across 5 Networks applications - ARM, DFIS, SAP IS-U, AREAS and OMS and 2) a referencing solution linking Customer MPRNs to network outlets and synchronised across SAP IS-U, OMS and AREAS. The main benefits of the new solution include - enhanced data quality through improved system validation; system aided processes for dealing with exceptions and suspect data; synchronisation of core data across relevant applications; improved outage notification data. A significant portion of the project included data cleansing and successful data reconciliation both pre and post release of the solution.
- OMS was modified to support the Centralised MV control pilots in Killarney and Drogheda areas. It now carries the operational standing instructions for each MV network outlet and displays the unique Switch IDs for all overhead switching devices as on the Operations Area Network Diagrams.

Smart Metering

A detailed tendering process was carried out which concluded in July 2008 when Smart Meter and IT Vendors for the Customer Behaviour Trial and Technology trials were selected. The aim of the Customer Behaviour Trial was to establish how information from smart meters can help customers reduce their peak usage and overall consumption.

Extensive work was carried out with the Meter Vendor for the Customer Behaviour trial. The aim of the Customer Behaviour Trial was to establish how information from smart meters can help customers reduce their peak usage and overall consumption. The Head End hardware and software were successfully installed in Sept/Oct. 08.

Extensive testing was carried out to verify the correct operation of the smart meters communicating with the central computer systems. The first Smart meter was installed on 15th Dec.08 and ESB Networks Ltd. had installed 250 smart meters nationally by the end of 2008.

LUAS PROJECT

The following summarises ESB Networks Ltd. works on each of the LUAS lines during 2008:

LUAS B1 line (Sandyford - Cherrywood) :

- Outstanding cable diversionary works from 2007 have been completed.
- Designs have been prepared and issued for the 4 new connections for traction supplies and the 10 LUAS stops and traffic signals, which will be installed in 2009 in conjunction with the LUAS ducting schedule. (Expect to see LUAS running in early 2011).

LUAS C1 line (Connolly Stn - Spencer dock):

- All diversionary works completed in 2008 (45 cables totalling 4km of cable).
- The traction supply including an underground substation has also been completed. The remaining new connections for LUAS stops and traffic signals will be completed in 2009 in conjunction with the LUAS schedule. (Expect to see LUAS running in 2010)

LUAS A1 line (Tallaght - Saggart):

- All designs were finalised in 2008 for diversions and new connections which will progress in 2009 in conjunction with the LUAS schedule. (Expect to see LUAS running in 2011).

Metro North (Stephens Green via Airport to Bellingstown) :

- Detailed design work has been completed for diversionary works at Stephen's Green, O'Connell Street and Parnell's Square to enable major excavations for Metro stations.
- Significant design work on traction supplies via three 110kV stations (incl ESB Networks Ltd's first underground 110kV station) has been completed. Civil works by LUAS expected to start in late 2009.

Metro West (Orbital line from Tallaght to Ballymun), LUAS F (College Green - Lucan), LUAS BXD (Stephen's Green to O'Connell St and onto Cabra):

- Preliminary design works on traction supplies and HV cable diversions were ongoing.

IWM (Integrated Work Management)

Integrated Work management (IWM) is a hugely important project and the solution will be used to manage all of the capital work programmes from large projects down to individual customer connections. The solution is SAP based and uses a new module in SAP called Compatible Units; this allows work to be specified and issued based on standard units of construction work. It will also draw on other SAP modules such as PS (project systems) and xRPM (resource and portfolio management). This latter feature will allow the definition and tracking of capital work from a portfolio viewpoint. When implemented, IWM will allow the retirement of a number of legacy systems such as DWMS, TA database, and PMI workbooks. The IWM project went live in mid July 2009.

8.0 Access to Land and/or Premises

Pursuant to Condition 14 of the DSO Licence and as required in Condition 17, the following are the general principles and procedures that ESB Networks Ltd. will follow in respect of any person acting on its behalf who requires access to land and/or premises for the purposes set out in this licence.

- All such employees or representatives acting on behalf of ESB Networks Ltd. will possess the skills necessary to perform the duties for which access is required and will be appropriate persons to visit and enter the land and/or premises.
- Both employees and representatives of ESB Networks Ltd. will be in possession of identity cards that clearly identify them as such. These identifications will be available to the persons occupying the land and/or premises. All vehicles arriving on these sites will either carry the full ESB Networks Ltd. livery or be clearly identified as working on behalf of ESB Networks Ltd.
- ESB Networks Ltd. will ensure that any person visiting land and/or premises on its behalf will be able to inform Final Customers connected to the Distribution System, on request, of a contact point for help and advice they may require in relation to the distribution of electricity.

Records are maintained of individual training, levels of approval to carry out work and the issue of ID cards. The contact no. of the customer contact centre is available via briefing material to all team members and is printed on every DSO vehicle.

9.0 Service Level Agreements

There are three market roles that ESB Networks Ltd. performs that are central to supporting a fully open market; these roles are the Meter Registration System Operator, Data Collector and Meter Operator. These functions involve daily processes to support the market. The processes are detailed in a suite of documents referred to as the Market Process Documents (MPDs).

Service Level Agreements (SLA) set out the target service levels the DSO will operate to in providing market roles to all market participants. The format of the SLAs, in general terms, outline the time frames within which suppliers can expect the required transactions to have been completed in response to the supplier message. These market messages and related SLA's are based on the agreed processes approved by CER.

The document ESB Networks Ltd. Service Level Agreement – published 2/11/2004 – provides more detail on all SLAs. This document can be referenced on ESB Networks Ltd. Website.

http://www.esb.ie/esbnetworks/downloads/esb_networks_sla_nov2004.pdf

The Service Level Agreement (SLA) Report overleaf contains the complete set of results available for 2008. The report provides a description of each SLA and the measure against which its level of performance is reported. It is inevitable that a small number of exceptional transactions will require special manual handling for a number of reasons, to accommodate such cases the performance targets are set below 100%, in most cases it is 95%. The performance target timeline for those transactions that do exceed the SLA timeline is set at twice the SLA timeline.

The actual performance is measured as the percentage of transactions that were completed within the agreed SLA timeline and the percentage completed within twice the SLA timeline during 2008. The Comments column is used to provide an explanation of the reason why the actual performance has not reached the set performance target and the Actions column explains what actions will be carried out to improve performance in the future.

Performance against SLAs:

Significant progress was made during the year on performance against SLAs. Out of 42 standards, 32 were met. In all of the 10 exceptions, the gap had continued to narrow since 2007 and, as a result, two of the ten were being met in 2008.

As in 2007, all standards in the key area of MRSO were met or exceeded including the provision of data to the SEM. Also for the second year the standards for quoting customers for a new connection and connecting them on receipt of the ETCI cert were met.

As a result of a dedicated project being established, the measure of at least one meter reading per annum in 98% of cases was met for the first time. This is of major importance to suppliers in terms of their costs. It is also very important for customers and suppliers at a time when the number of changes of supplier has increased sharply. Against the backdrop of increases in vacant buildings and remote unmanned sites, such as mobile phone masts, reaching the target is a significant achievement.

Terminology used within SLA Report

Scheduled Read – A scheduled read is the meter read taken by the meter reader (working on behalf of ESB Networks Ltd.) on a 2 monthly cycle.

Special Read – In some cases a supplier may request ESB Networks Ltd. to take a special read additional to the normal scheduled read cycle. Typically this will be taken where a Change of Supplier is required.

Customer Read – In the event that a meter reader cannot gain access to read a meter, a card will be left at the customer site, suggesting that the customer read the meter themselves, in which case a bill will be based on the customer read. In addition customers can take a meter read at any time, and a bill will be issued based on this read. This is termed an **Out of cycle customer read**

Block Estimates – As per SLA, each customer will be visited 4 times per annum, and bills should be based on actual meter reads on these occasions. The remaining two bills will be based on estimates. These are planned or block estimates.

De-Registration – where an account is no longer registered to a supplier. Typically this will be where an account is de-energised.

Energisation – is the actions taken to allow the flow of electricity to a premises

2008 DISTRIBUTION PERFORMANCE REPORT

No.	SLA		Performance Targets		Actual performance		Comments	Actions identified where targets are not met
	Description	Agreed Measures	Within SLA timeline	Within twice SLA timeline	Within SLA timeline	Within twice SLA timeline		
	Change of Supplier requests for Non Quarter Hour (NQH) customers							
1A	Validate Change of Supplier(NQH)	Validate within 5 days	95%	5%	100%	0%		
1B	Complete Change of Supplier(NQH) Using Customer Read	Complete within 3 days	95%	5%	96.64%	2.85%		
	Using Special Read	Complete within 10 days	95%	5%	98.44%	0%		
	Using Scheduled Read	Complete within 3 days	95%	5%	98.69%	0.52%		
	Change of Supplier requests for Quarter Hour (QH) customers							
2A	Validate Change of Supplier(QH)	Validate within 5 days	95%	5%	99.91%	0%		
2B	Complete Change of Supplier(QH)	Complete within 3 days	95%	5%	97.67%	1.90%		
	Change of Supplier Cancellation							
3A	Validate Change of Supplier Cancellation	Validate cancellation within 5 days	95%	5%	100%	0%		
3B	Complete Change of Supplier Cancellation	Complete cancellation within 5 days	95%	5%	100%	0%		
	New Connection for Non Quarter Hour (NQH) customer and registration with supplier							
5A	Prepare Quote for New Connection to NQH customer	Within 7 working days where no site visit required Within 15 working days where site visit required	95%	5%	97%	3%	Calculations for this SLA were based on records for quotations issued within customer charter guidelines	
5B	Complete connection on receipt of ETCI certificate	Within 10 working days of receipt of certificate.	95%	5%	98%	2%		
5C	Data Processing NQH New Connection	Issue details to Supplier within 10 Days	95%	5%	95%	4%		
	New Connection for Quarter Hour (QH) customer and registration with supplier							
6A	Prepare Quote for New Connection to QH customer	Within 7 working days where no site visit required Within 15 working days where site visit required	95%	5%	97%	3%	Calculations for this SLA were based on records for connections completed within customer charter guidelines	
6B	Complete connection on receipt of ETCI certificate	Within 10 working days of receipt of certificate.	95%	5%	98%	2%		
6C	Data Processing QH New Connection	Issue details to Supplier within 10 Days	95%	5%	88%	4%	This covers a small number of Service Orders (75 in total) - the process can be delayed due to manual processes to ensure data configuration is correct before account is set up. Only 6 Service Orders were processed outside SLA timeline	Local areas need to ensure correct metering is installed in line with MCC on service orders
	Change to meter point characteristics (covers a range of criteria including changes to connection agreement							
8A	Prepare quote for change in meter point characteristics	Within 7 working days where no site visit required Within 15 working days where site visit required	95%	5%	97%	3%		
8B	Complete change on receipt of ETCI certificate	Within 10 working days of receipt of certificate.	95%	5%	98%	2%		
8C	Process Change of Meter Point Characteristics	Issue details to Supplier within 10 Days	95%	5%	89%	6%	117 Service Orders were outside SLA timeline. Majority were delayed due to incorrect Master Data Configuration which prevented account being set up on Database	Local areas need to ensure correct metering is installed in line with MCC on service orders

2008 DISTRIBUTION PERFORMANCE REPORT

No.	SLA Description	Agreed Measures	Performance Targets		Actual performance		Comments	Actions identified where targets are not met
			Within SLA timeline	Within twice SLA timeline	Within SLA timeline	Within twice SLA timeline		
9	De-energisation of Meter Point (this can be at request of supplier, e.g. for non-payment of account, or at request of customer, e.g. when moving house)							
9A	De-energisation of Meter Point	De-energise within 5 days	95%	5%	84.42%	9.91%	While this figure is still below standard it should be noted that the figure represents a significant improvement on 2007.	Additional resources, introduction of handheld technology and a stricter adherence to process are continuing to pay dividends. We would expect further improvement in these figures in 2009
9B	De-energisation of Meter Point	Issue Meter details to Supplier within 10 Days	95%	5%	90%	5%	Significant improvement on 2007	MDM should improve this process
10	Re-energisation of Meter Point (delays can be caused due to customer interdependencies e.g. delivery of wiring certificate)							
10A	Re-energisation of Meter Point	Re-energise within 5 days	95%	5%	95.43%	2.64%		
10B	Re-energisation of Meter Point	Issue Meter details to Supplier within 10 Days	95%	5%	93%	5%	Significant improvement on 2007	MDM should improve this process
11	Change of Meter Configuration (delays can be caused due to customer interdependencies e.g. delivery of wiring certificate)							
11A	Receipt and validation of request and completion of physical work	Reconfigure within 5 days	95%	5%	88.87%	6.03%	While this figure is still below standard it should be noted that the figure represents a significantly improvement on 2007.	Additional resources, introduction of handheld technology and a stricter adherence to process are continuing to pay dividends. We would expect further improvement in these figures in 2009
11B	Processing of data	Process Data within 10 Days	95%	5%	90%	7%	178 Service Orders outside SLA time-line	When all orders are updated via mobile this target can be achieved
12	Meter Problems and Reports of damage							
12A	Repair or Replace faulty meter	Complete Physical work within 5 days	95%	5%	71.61%	12.20%	This category has also measured calls reported by Meter Readers, the recording of some of these calls are duplicated.	Work is on-going at present to adjust the IT Systems to eliminate the problem of duplicate entries.
12B	Repair or Replace faulty meter	Process Meter Data within 5 days	95%	5%	77%	12%	Performance has improved in 1st Quarter 2009 & SLA being met	
14	NQH Meter Reading							
14A	Scheduled Read*	Distribution of Reads to Suppliers within 7 days (Includes Block Estimates)	95%	5%	99%	0%	*Measured for the 12 months to end March 2009.	
		2 Scheduled reading visits per annum	100%		100%			
		4 Scheduled reading visits per annum	97%		96.5%			
		Actual reads for scheduled meter reading visits	80%		84%			
		Actual reads for scheduled MD meter reads	98%		98%			
		One actual read per annum	98%		98%			
14B	Block Estimates	No Consecutive Block Estimations	99%		96%		Considerable improvement on 2007 performance	Stricter adherence to processes are continuing to pay dividends. We expect further improvement in these figures in 2009
		No Consecutive MD Block Estimations	100%		100%			
14C	Out of Cycle Customer Read	Readings processed within 3 days	95%	5%	98%	1%		
15	QH Data Collection							
15A	D+4 QH data (incl. estimates)	Send to SEM-O/suppliers in 1 workday	95%	5%	98%	2%		
			On D+4	Within 10 days	On D+4	Within 10 days		
15B	QH Actual Data	Send to suppliers within 4 and 10 days**	95%	5%	98.75%	99.32%***	**SEM Timeline *** Based on a sample of the Data	

2008 DISTRIBUTION PERFORMANCE REPORT

No.	SLA	Agreed Measures	Performance Targets		Actual performance		Comments	Actions identified where targets are not met
	Description		Within SLA timeline	Within twice SLA timeline	Within SLA timeline	Within twice SLA timeline		
16	Data Aggregation							
16	Data Aggregation	Issue of aggregated data to SEM-O/TSO/Suppliers and Generators within 5 days	95%	5%	99.44%	0.66%		
18	Request for Special Read							
18A	Request for Special Read	Site visit by 7 days	95%	5%	76%	24%	Due to the archiving of the messages we were unable to pull out the Requested Date from the Supplier. There is a field in the message where if the Supplier wants a requested date in the future the clock on the SLA would only start from there. All the requests for Special Reads are based on 7 working days from the receipt of the valid Supplier's request. This means that the report could be giving us a result that is worse than we actually achieved. The same comments and actions on SLA 18A apply for this SLA also	To ensure that this will not happen next year we have already retrieved the data for the first five months of this year.
18B	Request for Special Read	Issue of Meter details within 3 Days	95%	5%	46%	54%		
20	Change of SSAC							
20	Change of SSAC	Complete process in 3 days	95%	5%	99.94%	0.02%		
21	De-registration							
21	De-registration	Auto Completion within 5 days	95%	5%	100%	0%		
		Manual Completion within 10 days	95%	5%	100%	0%		
24	Change Customer Details							
24	Change Customer Details	Complete within 5 days	95%	5%	100%****	0%	****Based on a sample of the data. This is an accurate reflection of the Total data because there is a fully automated system in place	
25	Change of Legal Entity							
25	Change of Legal Entity	Complete within 5 days	95%	5%	100%	0%		

PERFORMANCE REPORT

10.0 Records and Reporting

Table 10 serves to illustrate the sections of this report that meet the requirements of Condition 17 Records and Reporting.

Table 10. Compliance Matrix

Clause		Requirement	Performance Report Reference		Comment
No.	Title		Ref.	Page No.	
13.3	Performance of the Distribution Business	Review of criteria	0.2	5	
13.4		Report annually on performance	Entire report	-	
13.5		Publication of criteria	0.1	5	Within report
17.1	Records and Reporting	Maintain a record of its general operation under Conditions 7, 8, 9, 13, 14 and 15:			
		7 Theft of Electricity	6.3	25	
		8 Meter Point Registration Service	6.2	25	
		9 Provision of Metering and Data Services	6.1	25	
		13 Performance Reporting	Entire Report		
		14 Access to Land or Premises	8	34	
		15 Customer Service Code and Complaints Handling Procedure	1.2.1	7	
			1.3.2	8	
17.3		Report annually on performance	Entire report	-	
17.4		Publication of Report	0.1	5	
17.5		Presented in a standard form to be approved by the Commission	0.2	5	

11.0 Compliance with licence requirements

The Compliance Officer for ESB Networks Ltd. has submitted a Compliance plan to the Commission. The Compliance Plan identifies a manager responsible for each area within the plan. The Regulation Manager is responsible in the Plan for signing off each year on compliance with the licence conditions of the DSO license. To support this, records are maintained of compliance activities under each clause of the license. These records are subject to internal audit.