

**Organisation (if applicable):**

UK Power Networks

**Additional comments:**

**Question 3.1: Do you know of other CNI operators that will be affected by the withdrawal of VLB services that we have not considered above? If so, please provide details of these CNI operators, and, if possible, please outline their awareness and preparedness for the withdrawal.:**

We are not aware of any other CNI operators not listed in the document.

**Question 3.2: Are there any other developments since the last BCMR or prospective developments that may be relevant to our review of this market? Please identify specific developments, explaining why they may be relevant.:**

UK Power Networks is migrating all of its existing intertripping circuits (those that use a communication system which enables both ends of a High Voltage electrical supply circuit to be disconnected from the supply grid in the event of a fault) currently using the VLB services onto a fibre network owned and operated by UK Power Networks. If the Ofcom regulation is removed before this migration is complete there is a risk that the cost of these circuits will increase, or BT may choose to cease one or all of these circuits which may leave the provision of intertripping at risk and therefore our customers' at risk of prolonged power outages.

**Question 4.1: Are there industry associations among the CNI community that you consider we need to contact to increase awareness of the withdrawal of these services?:**

Both the ENA (Energy Networks Association) and the JRC (Joint Radio Company) should be informed.

**Question 4.2: Do you know of any other category of CNI operator that will be affected by the withdrawal, but that would not become aware of it through our programme of engagement? If so, please provide details of the category of CNI operator and your view on how best to raise awareness with them.:**

No

**Question 5.1: Do you agree with our conclusion that the VLB TI retail market no longer satisfies the EC's three criteria test? If not, please explain your view.:**

No we don't agree with this conclusion. With consideration of the three criteria test: (i) there is no alternative infrastructure available to provide these services. Our existing sites are provisioned with copper circuits and as the BT fibre alternative would take as long to install and commission as that of our own fibre network, modern substitutes cannot be used. Modern

copper services do not have guaranteed propagation times or transmit and receive path symmetry so therefore cannot be used for our intertripping protection application. (ii) the nature of the diminishing market creates a barrier to effective competition. UK Power Networks will require time to migrate CNI services from the VLB products provided only by BT who therefore still have a monopoly. This we see as one sided and without regulatory protection could lead to pricing pressures and poor support for these existing services or in the worst case cessation of individual circuits. This situation could lead to the loss of the provision of intertripping services and therefore leave the power network at risk.

**Question 6.1: Do you know of any CNI operators that rely on retail VLB leased lines provided by KCOM? If so, please provide information about the CNI operator and contact information.:**

We are not aware of the situation other CNI operators face.