Distribution Performance Report 2009

Prepared by:

Distribution System Operator

ESB Networks Ltd.

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ESB Networks

www.esb.ie/esbnetworks

CONTENTS

1.0 Executive Summary

During 2009, ESB Networks Ltd. (ESBN) stayed within the allowances set by the Commission for Energy Regulation (CER) – both for operating expenditure and capital expenditure - while at the same time continuing to deliver a complex suite of technical work programmes and to maintain and improve customer service.

Customer Service

The service provided by the Customer Contact Centre continued to improve during the year. Customer service, as perceived by our customers across a wide range of benchmarks, is now at a very high standard. The number of customer complaints reduced for the fourth successive year. Overall customer satisfaction as measured by the CER increased again in 2009 to 90%.

Cost Performance

In nominal terms the Total Controllable Operating Cost reduced by 2.3% in 2009. However the cost per customer and cost per units distributed increased by 1.2% and 2.3% in real terms due to the unusual circumstances of the economy:

- The volume of Units Distributed reduced by almost 5%, this is mainly due to the decline in economic activity throughout the country.
- Although the Total Operating Cost reduced during 2009 in nominal terms, when the annual deflation rate of 4.5% for 2009 is applied these costs increased by 2.3% in real terms.

Achievement of capital programme

The capital programme proceeded satisfactorily in 2009 and, in general , the programme was on target at the end of the year. The Low Voltage (LV) Urban Programme was 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. During 2009 a solution was agreed between ESBN, CER and CCMA (City & County Managers Association). 65.7 MW of renewable generation was connected during the year.

Supply Quality & Reliability

Significant improvements to the quality and security of supply were delivered during 2009. The number and length of customer interruptions were both reduced to much lower levels, through focussed operations management. In addition, voltage quality on the network improved significantly during the period.

Safety

There was one electrical fatality due to contact with ESBN infrastructure during 2009 when a 20 year old man climbed a steel pylon and made contact with a live 38kV overhead electricity line conductor.

A number of initiatives were taken and publicity campaigns conducted.

- Codes of Practice and involvement with the Health & Safety Authority (HSA)
- Development of Primary Schools Safety Promotional Pack with Agri Aware and FBD Insurance
- Map Sharing Agreement with Bord Gais
- Advertising/Promotion 2009
    - 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 most of the local and national radio stations (MORI Survey showed a 74% awareness level)
    - Provision of stands at Agriculture and Construction Machinery shows and safety Conferences including the National Ploughing Championships, Tullamore National Livestock Show and the National Machinery Plant Exhibition 2009.
- The second Safe Driving Programme was launched and it coincided with the launch of a Strategic Alliance with the Road Safety Authority (RSA)

Market Services

The Meter Registration System Operator (MRSO) reported a sharp increase in the volume of changes of supplier in 2009 as a result of increased competition in the domestic sector. This increase posed management challenges but the standard of service was maintained in accordance with service levels.

Improvements in 2009

PR2 also saw important developments for national energy efficiency improvements. ESBN has undertaken a smart metering trial, in conjunction with industry participants, to assess the potential for the roll-out of a smart metering system that could bring improved energy efficiency across the full electrical energy spectrum. This work is being carried on into PR3.

Service Level Agreements

Performance against SLAs was in general very good in 2009. Out of 42 standards, 32 were met. In most of the exceptions, performance was marginally outside of a very demanding target e.g. no consecutive block estimates in 98% of cases vs. a target of 99%. In addition the key target of achieving one actual meter reading per year in 98% of cases was met. This is a very high level of performance and is challenging and costly to achieve.

Compliance with licence requirements

In January 2009, the CER issued a revised DSO licence to ESB Networks Ltd., a subsidiary company established to comply with the requirements for separation of a recent EU directive. A separate Distribution Asset owner licence was issued to ESB.

ESB Networks Ltd. appointed a Compliance Officer. The Compliance Officer duly submitted a Compliance plan to the CER. 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 Distribution System Operator (DSO) licence. To support this, records are maintained of compliance activities under each clause of the licence. These records are subject to internal audit.

2.0 Introduction

ESB Networks Ltd. has been granted the Distribution System Operator (DSO) licence by the Commission of Energy Regulation (CER). The licence imposes a range of obligations and performance measures on DSO. Condition 13 of the DSO licence requires the DSO to report annually on its performance under the licence. This report – the annual Performance Report – is prepared in order to fulfil that obligation for 2009.

The criteria reported upon in this report have been approved by the CER in accordance with Condition 13 of the DSO licence. A copy of the licence can be found at the following link:
http://www.esb.ie/esbnetworks/download_documents/reports_codes.jsp

Performance is reported under the following headings:

- Publication, review and proposed revisions
- Customer Service
- Cost Performance
- Achievement of capital programme
- Supply Quality & Reliability
- Safety
- Market Services
- Improvements in 2009
- Access to Land and/or Premises
- Service Level Agreements
- Records and Reporting
- Compliance with licence requirements

2.1 Publication of report on ESBN website:

In compliance with Conditions 13 & 17 of the DSO Licence this Performance Report will be published on the ESBN Website at the following link:
http://www.esb.ie/esbnetworks/download_documents/reports_codes.jsp

2.2 Review of performance criteria and recommended revisions:

In Table 4, Capacity added is included as a measure of load reinforcement, to align with CER's PR2 decision.

3.0 Customer Service

Key indicators of customer service performance include service delivery by ESBN's Customer Contact Centre and the treatment of complaints by staff of the DSO. Table 1 summarises the performance in this area.

TABLE 1 Customer Service Key Indicators

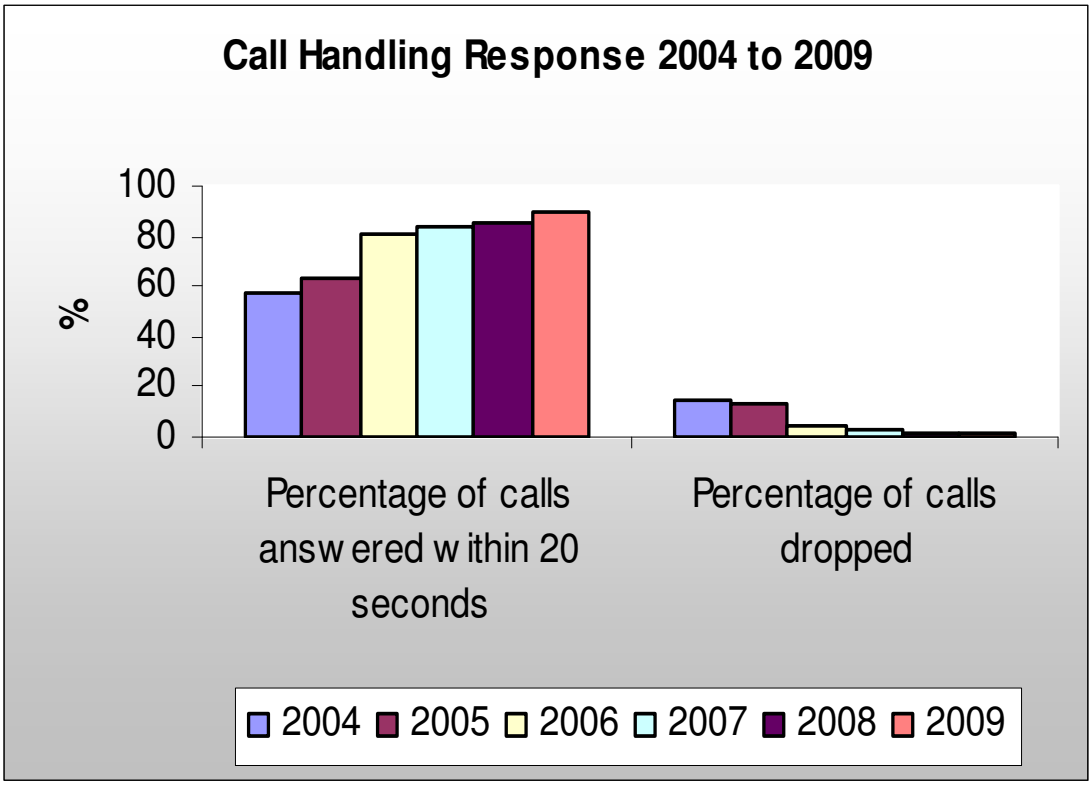
Description of Criteria	Value
Call Handling Response[1]	
Percentage of calls answered within 20 seconds	90%
Percentage of calls dropped[2]	1.1%
Networks customer calls to the call centre	759812[3]

Graph 1 shows the trends in Call Handling Response since 2004. The percentage of calls answered within 20 seconds has continued to improve each year and the percentage of calls dropped has continued to reduce, reflecting the benefits achieved by the investments in Intelligent Voice Recognition technology.

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 terminated the call without waiting for a response.

3 The exact number of calls relating to ESBN issues are identified.



Graph 1

3.1 Customer Performance Report 2009

The Distribution System Customer Service Code, Complaints Handling Procedure and Disconnection Code of Practice have been submitted to and approved by the CER. These procedures are published by ESBN on our website as follows:

- Distribution System Customer Service Code www.esb.ie/esbnetworks/about_us/customer_charter/customer_charter.jsp
- Complaints Handling Procedure www.esb.ie/esbnetworks/about_us/complaints.jsp
- Disconnection Code of Practice www.esb.ie/esbnetworks/downloads/revised_deenergisation_code_of_practice_june_06.pdf

3.2 Customer Service Code

3.2.1 Customer Service Code (Arrangements)

ESBN 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.

ESBN 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 times to complete each activity are measured and management reports issue monthly to line managers to monitor service delivery. ESBN'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 ESBN 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.

Significant progress was made during 2009 on initiatives to protect the interests of vulnerable customers on life support equipment. The final phase of this work is due for market release in mid 2010.

3.3 Complaints Handling Procedure

3.3.1 Complaints Handling Procedure (Arrangements)

ESBN 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 -
a) A dedicated phone line in our Customer Contact Centre
b) By email to a dedicated email address
c) In writing through the local ESBN office

Full details of ESBN's complaints procedure and the relevant 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 are empowered to resolve complaints promptly and our target is to respond to 92% of all complaints received through these channels within 5 working days. ESBN 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 2009 with Graph 2 giving a graphical representation of the figures.

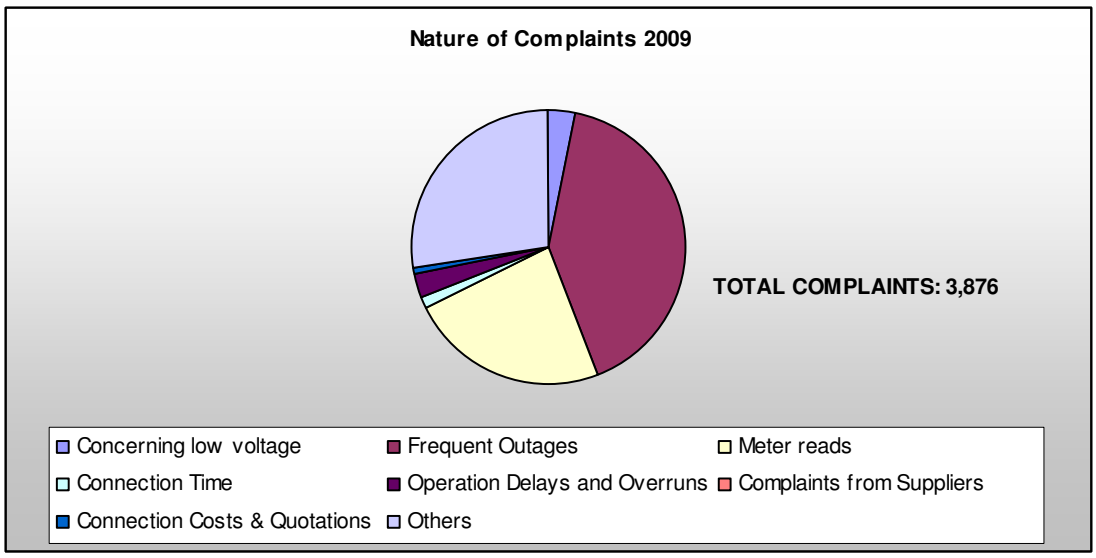
TABLE 2 Complaints[4] and No. of Terminations and De-Energisations

Description of Criteria	Number
Complaints received	**Number**
Concerning low voltage	134
For frequent outages	1,581
Time to connect customers	57
Operation Delays and Overruns	102
From Suppliers	0
On connection costs and budget quotations	38
On Meter reading and Estimated reads	901
Others	1,063
Total complaints received in 2009	3,876
Connection points terminated[5]	6,994
Connection points de-energised[6]	10,459

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 ESBN, or an outside party

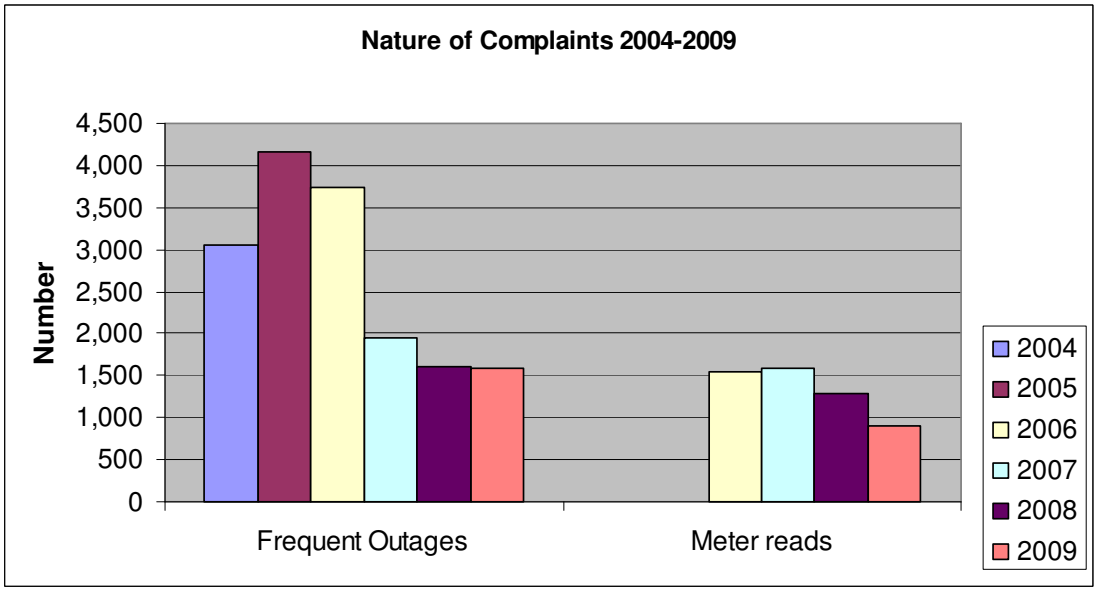
5 This figure includes connection points in vacant premises that have been terminated following previous de-energisation and de-registration, it also includes MPRNs associated with housing scheme quotations that have not progressed

6 De-energisation for non-payment

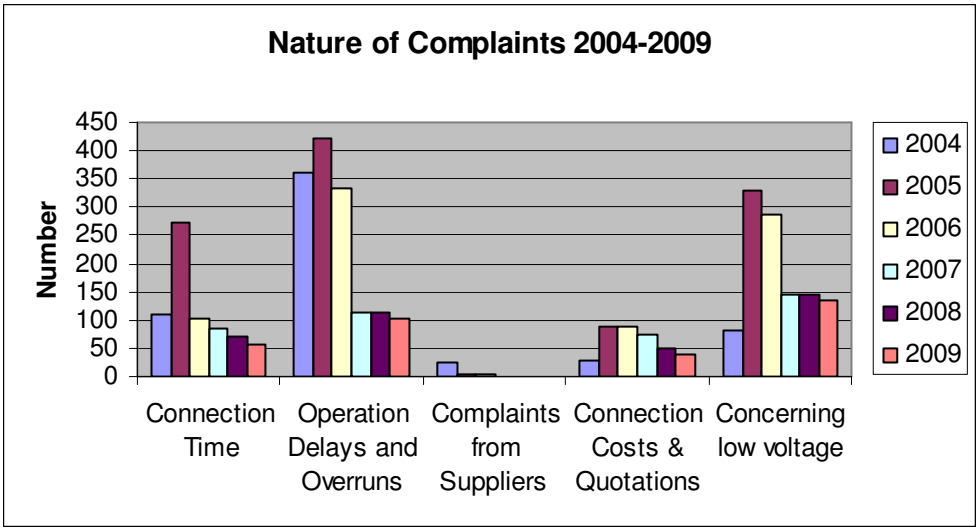


Graph 2

Graphs 3 and 4 indicate the trends in numbers in the main categories of service complaints received over the 6 year period 2004 to 2009.



Graph 3



Graph 4

As can be seen in graph 3 and 4 the number of complaints in each category has reduced during 2009. In particular, the number of complaints concerning low voltage continues to reduce due to continued investment in the LV refurbishment programme.

There has been a major improvement in complaints relating to frequent outages in recent years due to increased focus on Live-Line working and the introduction of portable generators to contain and minimize the amount of network disconnected.

The number of complaints relating to the Time to Connect customers, Operation Delays and Overruns, Connection Costs and Budget Quotations have all reduced in 2009, due to the decline in economic activity and consequent reduction in work backlogs.

The number of complaints relating to Meter Reading and Estimated Reads[7] has reduced by 30% in 2009.

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

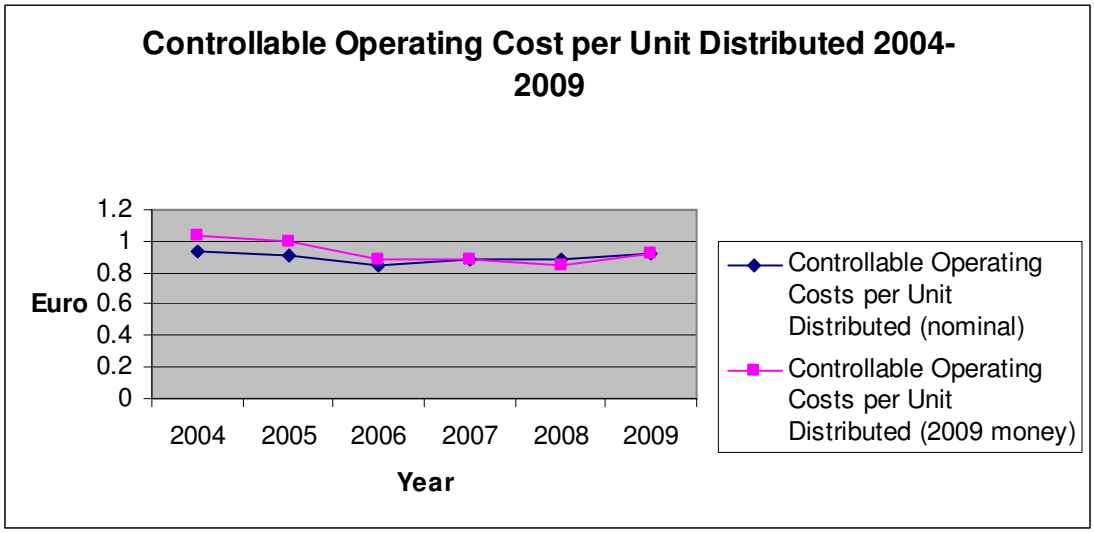
4.0 Cost Performance

CER have set targets for operating expenditure and the DSO will aim to achieve these and, where possible, improve on them. Table 3 summarises the DSO's performance in 2009 in relation to two key cost criteria.

TABLE 3 Cost Performance

Description of criteria	2009 Value
Controllable Costs	
Controllable Operating Cost per unit distributed	€0.92 / kWh
Controllable Operating Cost per customer	€93.93 / Customer

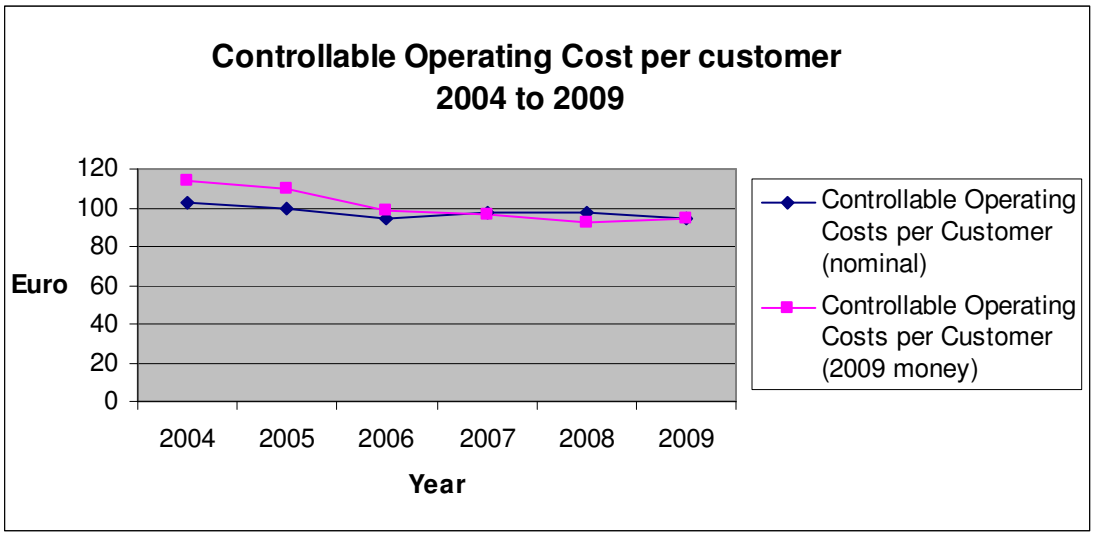
The aim is to keep these Controllable Costs as low as possible whilst maintaining the operational integrity and efficiency of the Networks. Graphs 5 and 6 below show the real and nominal values of Controllable Operating Costs per Unit Distributed and per Customer.



Graph 5

In nominal terms the Total Controllable Operating Cost reduced by 2.3% in 2009 but as can be seen from Graph 5 the Controllable Operating Cost per Unit Distributed increased in both nominal and real terms. The reasons behind these increases are as follows:

- The volume of Units Distributed reduced by almost 5%, this is mainly due to the decline in economic activity throughout the country.
- Although the Total Operating Cost reduced during 2009 in nominal terms, when the annual deflation rate of 4.5% for 2009 is applied these costs increased by 2.3% in real terms.



Graph 6

Graph 6 shows that in 2009 the Controllable Operating Cost per Customer reduced in nominal terms but increased in real terms. The reasons behind these increases are as follows:

- Controllable Operating Cost per customer reduced by 3.3% in nominal terms during 2009. This was due to a reduction in the Total nominal Operating Costs and a marginal increase in the total no. of customers.
- Due to the 2009 deflation rate of 4.5% the Operating Cost per customer increased by 1.2% in real terms.

5.0 Achievement of Capital Programme

The DSO agreed an extensive capital programme with the CER for completion over the period 2006-2010. 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 2009 in relation to its overall capital programme are summarised in Table 4.

TABLE 4 Progress of Capital Programmes

Description of criteria	Value	Progress Comment (In relation to 2006-2010 Targets)
Total Capital Investment Programme Capital Investment Programme (2006-2010) achieved to date (%) (i.e. percentage of allowed capital spent)	66.9%	Distribution Capex Delivery is at 66.9% at the end of 2009. The make up of this is as follows: • NRP has been fully delivered • 82% of Reinforcement. • 44% of LVR • 41% of Asset Replacement
LV Refurbishment Programme in 2009 Groups completed (no.)	8,158	On Target
LV Urban Programme in 2009 Spans completed (no.)	4,861	See comment below
HV Cable Replacement Programme 2009 110kV ducting for oil filled (km) completed to-date	3.8km	7km to be completed by end of 2010
Capacity added during 2009 Increase in 110kV/MV capacity Increase in 38kV/MV capacity	140 MVA 61 MVA	On track to deliver the overall capacity target
Rebuild & Refurbishment of 50's copper 38kV line in 2009	569 km	On Target

Description of criteria	Value	Progress Comment (In relation to 2006-2010 Targets)
MV Substations Asset Replacement in 2009		
1. Metrovicker Units (no.)	13	On Target
2. Oil-filled Switchgear Subs (no.)	13	On Target
3. Cast Resin Kiosks (no.)	255	On Target
20kV Conversion (km) in 2009	6,652	On Target
Embedded Generation connected to the Distribution System in 2009		
No. of Windfarms Connected	12	The total capacity of all Windfarms that are connected to the Distribution System is 572MW. (The Total Capacity connected to both the Distribution & Transmission Systems is 1264MW)
Total MW Connected	65.7	

LV Urban Programme:

The LV Urban Programme was 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. During 2009 a solution was agreed between ESBN, CER and CCMA (City & County Managers Association). Due to this factor the LV Urban Programme for PR2 has been delayed.

6.0 Supply Quality and Reliability

Supply reliability is an essential aspect of distribution system performance. The total number of interruptions of 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

Description of criterion					Value
Number of Outages[8]					
Voltage	*Urban customers*[9]		*Rural customers*		Total
	Fault[10]	Planned	Fault	Planned	
LV	7007	44	13296	1337	21684
10kV	1095	186	4589	3689	9559
20kV	444	609	3239	1447	5739
38kV	11	0	38	0	49
> 38 kV					
UNKNOWN	41	37	78	183	339
Total exc Storm Days and Major Renewal Programmes	**8598**	**876**	**21240**	**6656**	**37370**

8 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.

9 For continuity monitoring purposes, ESBN 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.

10 Fault data does not include outages on major storm days

In an overall context, the number of LV outages increased in the period 2005-2008 but have reduced in the period 2008-2009.

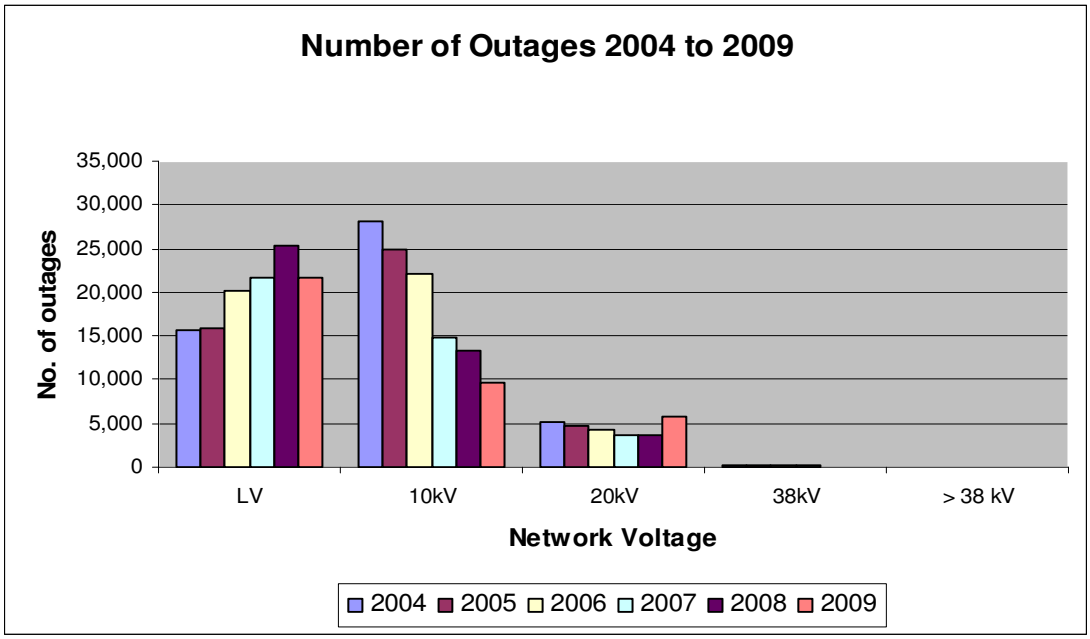
The increase in LV outages between 2005 and 2008 is believed to be due in part to the following factors:

- Improved Reporting: It is believed that customers are making greater use of the ESBN 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 ESBN 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 2005 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.

The reduction in LV outages in 2009 are due to the following factors:

- The reduction is mainly due to more benign weather conditions during 2009
- Further progress on the LVR and LVU refurbishment programs

MV faults have increased slightly but planned outages have reduced substantially since 2005. The main factor behind the reduction in planned outages up to 2007 was due to the MV renewal programme coming to a close. Since 2007 the number of planned outages have continued to reduce due to the increased use of live working techniques at MV, improved outage management and the reduction in new business volumes.
In relation to MV fault outages the number of recorded 20kV outages increased in 2009 and the number of 10kV outages decreased. The reasons for the increase in 20kV is that the volume of 20kV networks on the system has increased, another factor was the improved accuracy in the reporting of the voltage level of MV outages. The main reason for the reduction in 10kV fault outages is due to more benign weather conditions during 2009 and the reduction in volume of 10kV networks due to 20kV conversion.



Graph 7

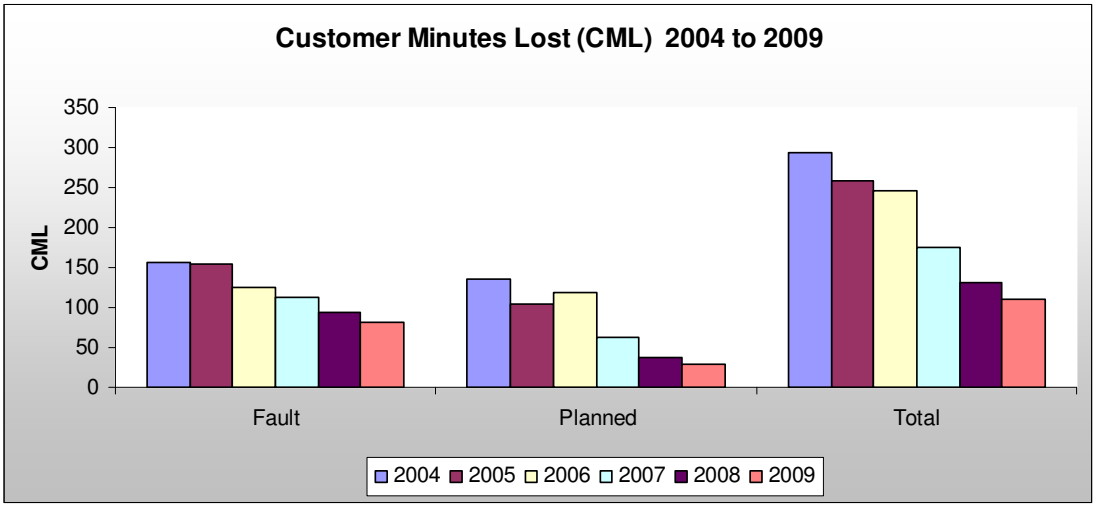
The impact of outages on customers across the entire distribution system is measured by two parameters; average number of interruptions per customer connected in the year (CI) and the average number of minutes without supply per customer connected in the year (CML). CER has set targets for Customer Interruptions (CI) and Customer Minutes Lost (CML) for the period 2006-2010. CER has incorporated an incentive/penalty scheme in the DSO's revenue control formula whereby ESBN 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 ESBN's control, there is an adjustment for storms days.[11]

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

Description of criteria	Value		
Customer Minutes Lost			
	Fault	**Planned**	**Total**
Total **(including Major Renewal Programmes)**	**81.3**	**59.3**	**140.6**
Major Renewal Programmes		29.2	29.2
Total (excluding Major Renewal Programmes)	**81.3**	**30.1**	**111.4**

11 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

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 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 CMLs have been improving year on year through a number of initiatives which were implemented. The reduction of CMLs 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, examples of these can be seen in figures 1 and 2 below. 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.

Figure 1 MV Pole Mounted Recloser

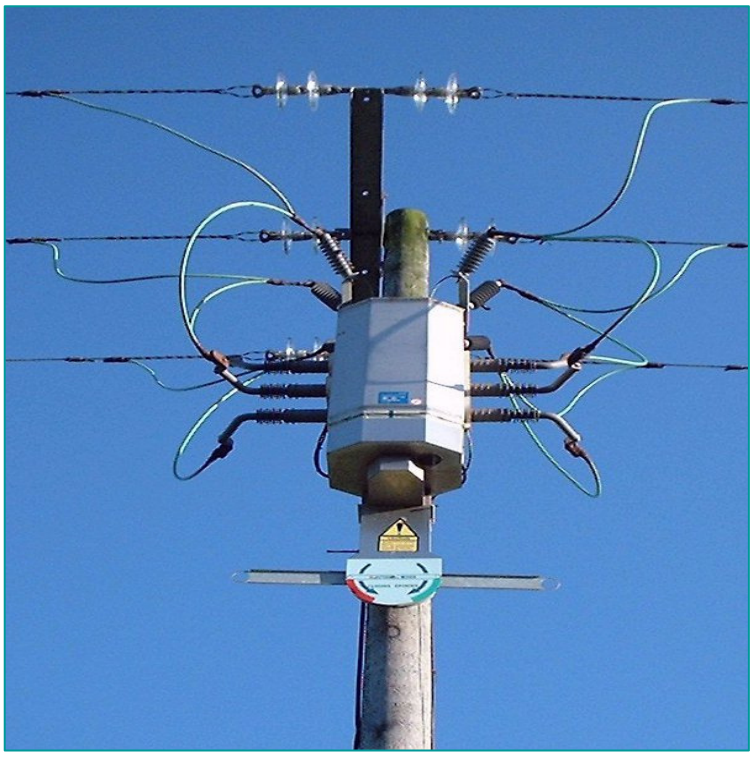


Figure 2 MV Soule Switch

Table 7 shows the number of storm days and details of the weather on those days.

TABLE 7 Storm Days

Description of criteria	Value
Storms and exceptional events Number of storm days	4
Description of storm days[12] **17th January 2009** Strong winds and rain. Gusts exceeding 120kmh, 161,424 customers affected **18th January 2009** Strong winds and rain. Gusts exceeding 120kmh, 42,023 customers affected **30th December 2009** Strong winds and snow. 56,886 customers affected **31st December 2009** Strong winds and snow. 24,158 customers affected Total no of customers affected by storm days in 2009 = 284,491	

TABLE 8 Faults Exceeding 4 Hours Duration and Voltage Quality Problems

Description of criteria	Value
Additional items	
Percentage of faults exceeding 4 hours restoration time[13]	17.5%
Customer Reports of problems relating to Voltage Quality	3,060
Verified problems relating to Voltage Quality	1,119[14]

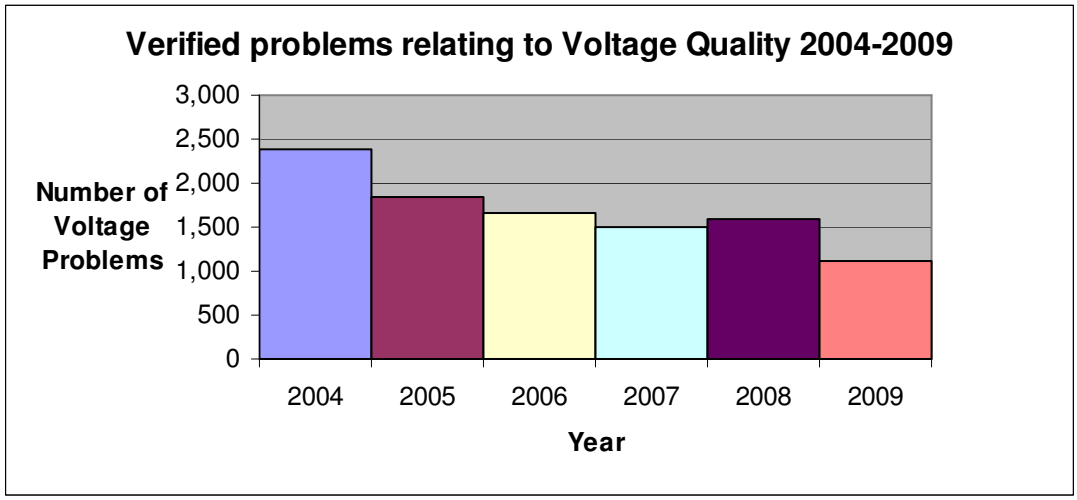
12 As per previous footnote 10 a storm day is defined as a day in which the reported customer hours lost due to fault exceeds 61,570.

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

14 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.

The Percentage of faults exceeding 4 hours restoration time was 17.5% in 2009. This shows a reduction on last years figure which was 18.6%.

The number of voltage quality requests are not categorized as service complaints but are essentially requests for a technical investigation of possible voltage problems. The number of Customers that reported problems relating to voltage quality reduced from last years figure of 3,447, the figure of 3,060 in 2009 was an 11% reduction on 2008 and arises due to continued investment in the LV refurbishment programme. Graph 9 illustrates the trend in verified problems relating to Voltage Quality from customers.



Graph 9

7.0 Safety

Fatalities and Serious Injuries

There was one electrical fatality due to contact with ESBN infrastructure during 2009. This occurred on the 24th July 2009 when a 20 year old man made contact with a live 38kV overhead electricity line conductor at the top of a steel pylon that he had climbed. There were also two fatalities from contact with electricity on the customers side of the meter during 2009.

The total number of electrical fatalities for the 10 year period from 2000 to 2009 is 36 (21 of these were on the networks side of the meter and 15 were on the customers side). The 10 year rolling total for electrical fatalities showed a decrease of 1 on the networks side of the metre and an increase of 1 on the customer side when compared to the 1999 to 2008 period.

There were no reported incidents of serious injuries to members of the public arising from contact with ESBN infrastructure in 2009. This is a significant improvement on 2008 when four people received significant injuries from contact on the networks side of the meter.

Public Safety Initiatives 2009

- **Codes of Practice and involvement with the HSA**

  Code of Practice for Avoiding Danger from Overhead Lines
  Presentations made at 15 Seminars/Conferences during 2009 with approximately 1000 attendees in total.

  Input to the development of "HSA Guidelines on Safe Working near Overhead Electricity Lines in Agriculture". Note that the Working Group is being lead by the HSA with input by ESBN, Teagasc and the Agricultural Contractors representative body.

  Participation on Working Group established to update the "HSA Code of Practice for Avoiding Danger from Underground Services" – public consultation process completed and final draft approved by the Board of the HSA. Revised Code is to be formally issued in January 2010.

KEEP SAFE multi agency safety awareness promotional events for 5th and 6th Class primary school children –ESBN have continued to input and participate with the HSA on this pilot programme. During 2009 pilots were held in Sligo and Ballina involving 8 primary schools. This is a follow on to the pilots launched in Donegal in 2008 which also involved 8 primary schools.

- **Development of Primary Schools Safety Promotional Pack with Agri Aware and FBD Insurance**

  One of the key objectives in ESBN Public Safety Plan is to raise safety awareness amongst the young about the potential dangers that can arise from electricity. During 2009 significant progress was made in developing a teacher's Resource Pack for primary schools in association with Agri Aware and FBD Insurance. This will be issued to all primary schools in early 2010.

- **Map Sharing Agreement with Bord Gais**

  Formal Agreements were reached with Bord Gais for the exchange of electronic copies of all Gas and Electricity infrastructure map records between both organisations for use by staff and contractors. The Bord Gais map records have been incorporated into ESBN electronic map record systems and Bord Gais have likewise incorporated ESBN's map records into their recording systems. This is a significant advancement in helping to minimise the risk of future dangerous damage incidents due to Dig-Ins on both gas pipelines and underground electricity cables.

Advertising/Promotion 2009

- 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 most of the local and national radio stations(Note results from IPSOS MORI Survey to benchmark performance on the public safety radio advertising campaign were very positive with a 74% awareness finding)
- Provision of stands at Agriculture and Construction Machinery shows and safety Conferences including the National Ploughing Championships, Tullamore National Livestock Show and the National Machinery Plant Exhibition 2009

Safe Driving Programme

ESBN launched its first Safe Driving Programme in 2004 with the primary objective of creating an awareness of safe driving behaviours and practices. The programme was very successful and resulted in reduced injuries to staff and the general public, and a reduction in vehicle collisions. The second Safe Driving Programme was launched in June 2009, and coincided with the launch of a Strategic Alliance with the Road Safety Authority (RSA), where ESBN and the RSA have agreed to support each others programmes and campaigns. The Safe Driving Programme is managed for ESB by the Fleet and Equipment section of ESBN and already as part of the programme a number of iniatives have been realized. A new policy for fleet collision investigations has been developed. ESBN presented at the 'Road Safety at Work' International Conference, jointly held by the RSA and the HSA in June 2009. ESBN has signed up to the European Road Safety Charter in Brussels, where along with other organisations the common goal is to halve the number of traffic related fatalities by 2010. Within ESBN, the number of collisions involving ESBN Fleet reduced from 244 in 2008 to 193 in 2009.

Dangerous Occurrences

Table 9 reports on the number of dangerous occurrences associated with the networks infrastructure during 2009. These figures are broken down as third party damages[15] and non-third party notifiable fault incidents[16].

TABLE 9 Dangerous Occurrences

Description of criteria	2008	2009
Number of safety incidents		
3rd Party Plant Damages (excluding underground cable Dig-Ins)	260	265
3rd Party Plant Damages caused by underground cable Dig-Ins	1114	802
Non 3rd party – MV and 38kV notifiable fault incidents (e.g.line drops)	206*	178*
Non 3rd party – LV notifiable fault incidents	968*	676*

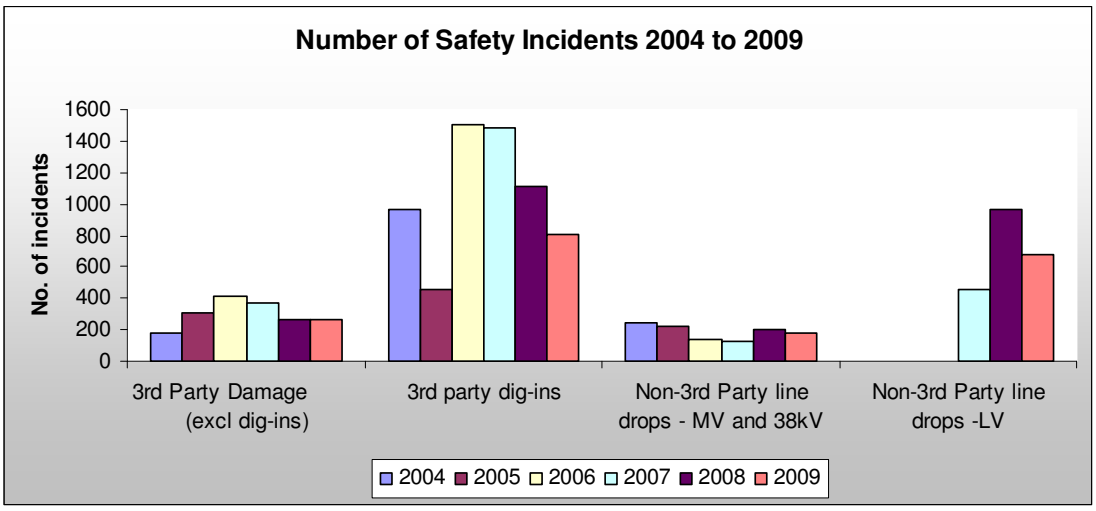
15 Third party damages are incidents where third parties cause damage to the networks infrastructure. These are broken down into incidents that involve damage to underground electricity cables termed 'Dig-Ins' and incidents that cause damage to other plant such as overhead lines, minipillars and substations. 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. 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.

16 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 ESBN are required under Health and Safety legislation to notify the HSA of these incidents.

* This data is based on records from the new OMS[17] (Outage 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 TCM[18] (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 and 2009 when compared with 2007 – see Graph 10. The data for 2009 is comparable with the data from 2008 and shows a reduction of 14% in 2009.

The increase at LV since 2007- see Graph 10- is also a result of improved reporting, coupled with an overall increase in the level of faults. The data for 2009 is comparable with the 2008 data and shows a reduction of 30% which is mainly due to more benign weather conditions during 2009. For a more detailed explanation on LV faults refer to Section 6 Supply Quality and Reliability.



Graph 10

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

17 Outage 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, timber etc.

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

8.0 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 CER so directs in writing, of its operation of any particular cases specified, or of classes specified, by the CER. Condition 7, 8 and 9 relate to Market Services and the records of their general operation that are kept by ESBN are as follows:

8.1 Provision of Metering and Data Services

8.1.1 Salient business and transaction data were maintained on the services provided under Condition 9 of DSO licence 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.

8.2 Meter Point Registration Service

8.2.1 In compliance with licence 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.

8.3 Detection and Prevention of Theft of Electricity

8.3.1 In compliance with licence 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.

9.0 Improvements in 2009

Customer Service

ESBN 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 /'08, a further improvement in service was delivered in 2009 and is reflected through a number of achievements:

- Similar to the previous year's improvement, a reduction of a further 40% was achieved for the number of charter payments made to customers in 2009 compared to 2008.
- Achievement of a new low in Customer Minutes Lost (CMLs) at 141 No., a reduction of 14 No. (i.e. 9%) 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 90% and 1.1% respectively being achieved in 2009.
- Overall customer satisfaction with Contact Centre handling of Networks' enquiries increased a further two percentage points in 2009 to a very high level of 85%.
- The full benefits of the Mobile Data Management technology were achieved in 2009 resulting in improved 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 2009.
- 4,562 jobs were undertaken using live working techniques delivering a saving of approx. 6.5 million customer hours lost.

Renewable Generation

2009 has been an eventful year in the area of renewable generation. Gate 3 – the 3rd Gate under Group Processing – commenced following a direction from CER in December 2008. Under Gate 3 the Distribution System Operator (DSO) and Transmission System Operator (TSO) will issue over 4000MW of connection offers to developers of renewable generation. To facilitate this TSO and DSO are working closely to ensure offers are issued on time to all parties and taking account of the many changes taking place in this area of business.

As part of Gate 3, DSO have made some changes to the benefit of customers :

1. Losses policy was revised to reflect the fact that the cost of losses is borne by industry and therefore should not be a factor in determining the Least Cost Technically Acceptable (LCTA) Connection Method in relation to dedicated assets.
2. Customers were allowed propose their own connection method for consideration by the System Operators prior to finalising their studies.
3. DSO hold customer meetings with all parties once their shallow connection method has been studied but in advance of Transmission Studies being completed.
4. Prior to Gate 3, offers were always issued in the first instance based on the LCTA connection – which typically is an overhead connection option. This led to frequent requests for modifications which imposes additional costs and time delays on the customers in question. For Gate 3, DSO has given customers the option of opting to cable shared or dedicated assets for their first offer.

In addition to the above there have been a number of improvements in the Commercial area pertaining to Generation. These include:

1. Changes to the connection offer documentation following extensive engagement with CER and the industry.
2. Delaying the last payment for a connection until post-energisation.
3. Ongoing work to improve the information available on the ESBN web site.
4. Introduction of a shortened application form for parties applying for connection as part of the Group Processing Approach.
5. A proposal to substantially increase the timeline (to 45 years) for rebating generators for connection assets, where other parties utilised those assets.[19]
6. A new Commercial Relations manager has been appointed to oversee interactions with customers throughout the post offer acceptance phase.

19 This proposal has yet to be approved

Further changes in this area include

1. Contestability for distribution connections was signed into law on the 15th of June 2009. This legislation now permits offers for connection to the electricity network at distribution level on a contestable basis i.e. the applicant and/or the DSO may arrange the construction of the connection to the system.
2. CER published a direction providing clarity on when generators might be eligible for processing outside the Group Processing Approach.

Sustainability

In 2009, ESBN launched its new strategy around Sustainability "Sustainable Networks Strategy Towards 2020", which aims to deliver a world-class sustainable networks business for Ireland. This strategy is designed to ensure:

- Delivery of a networks infrastructure and services that support national economic growth and sustainability targets, and

- Underpin business and value growth with excellence in safety, customer service, asset management and people development.

ESBN successfully embedded sustainability in its business during 2009 through positive engagement with staff, suppliers, key stakeholders and customers. Significant progress was made across all areas of our sustainability program and some of the key highlights are outlined below:

- ESBN installed 10,000 smart meters and associated communications and IT systems to support the Smart Metering User Trial which was established by CER as part of the national smart metering plan. ESBN provides the relevant Electricity Supplier with daily consumption data for these customers. About 1200 customers received in-home display units linked to their meters.

- Sustainability was emphasised as a core value of ESBN through the ongoing monitoring and communication of sustainability performance in line with our plan to reduce carbon emissions by 30% by 2013. ESBN made significant progress during 2009 to improve sustainability performance across all aspects of its business and to reduce its internal carbon footprint. Many initiatives were introduced and significant progress was made in reducing by 9% energy usage in our buildings and improving by 9% our waste recycling rates.

- In the context of Sustainable Networks 2020 Strategy, ESBN continues to work towards becoming a world leader in smart networks implementation. A number of projects were initiated in 2009 to assist in this aim including:

    - Membership of and an approved research and demonstration programme with The Electric Power Research Institute (EPRI), an American based Research Institute, geared to enable the smart networks strategy.

- Involvement with MERGE (Mobile Energy Resources in Grids of Electricity) which is a collaborative project incorporating 17 member organisations and established to assess the strategic impact of the roll out of electric and plug in hybrid vehicles on grid infrastructure.

- The government extended the scope of SFI (Science Foundation Ireland) as the agency to cover R&D on Energy. ESBN has been working with ERC (Electricity Research Centre in UCD), Academia, EPRI and some of the largest companies in Ireland, to create a coalition to focus research on the integrated smart networks strategy.

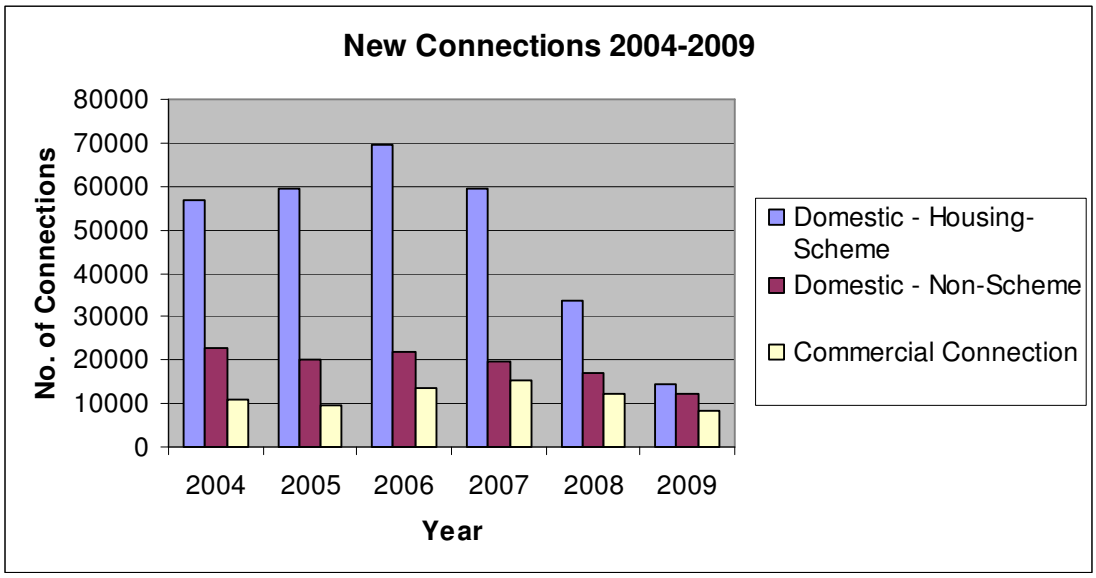
- A package of supports were introduced by ESBN to promote micro-generation in the context of the sustainability strategy, the development of smart networks, the support for the government sustainability strategy and in support of a jobs stimulus package.

- A research pilot was initiated to assess the possibility of using pure biodiesel (B100) and biodiesel blends (B20/B30) in ESB fleet vehicles. The fuels are tested across a range of vehicles with a view to deciding what fuel or fuel blend is most suitable for adaptation in fleet vehicles. The vehicle trial is unique in that it involves both on-road and off-road vehicles.

- ESBN erected the first electric vehicle charging posts, giving visible evidence of the ESBN rollout of public charging infrastructure.

New Connections

In 2009 a total of 34,851 new connections were completed by ESBN. This was a decrease of over 28,000 on 2008, and reflected the general economic downturn. Indications are for a further drop in new connections in 2010.



Graph 11

Operations

- During 2009 SCADA (System Control and Data Acquisition) installation was completed in a further seven 110kV stations and three 38kV stations. SCADA coverage is now at 98% 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 180 automatic network switches and reclosers installed bringing the total number installed and remotely controlled from SCADA to 1,085.
- The rollout of centralised control of the medium voltage (MV) distribution system into the two Distribution Control Centres (DCCs) commenced during 2009 with Killarney & Drogheda Areas now being controlled from the Distribution Control Centres(DCCs). The programme for the remaining 32 Areas will commence in Q1 2010 with a target of having all 34 Areas being controlled from the DCCs by the end of 2011.
- Work was completed on the upgrade of the SCADA system to Network Manager 3 during 2009. This system is the latest version of the SCADA System and was required to facilitate the further deployment of Network management and control technologies on the MV Networks and for embedded generation.
- The 38kV LBFM (Load Break Fault Make Switch), sourced to replace the 38kV ABS (air break switch) on the 38kV overhead network, have been installed in a total of 12 locations. Work is continuing to install a further 10 during 2010.. This device is also being fitted with a remote control facility to allow it to be fully controllable from the DCCs.
- There were 50 operational incidents reported in 2009 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 2008 outcome of 47 incidents.
- Continuing 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 in service in Baltinglass and returning very good results on fault performance and supply continuity to our customers supplied from Baltinglass station. The development of the Kilmacthomas system is awaiting the delivery of a replacement neutral earth resistor which is expected by Q2 2010. A review of both systems will be undertaken in 2010 with a view to making a recommendation for ESBN in the treatment of the neutral for its 20kV system.

- NDCC and SDCC SCADA Databases were merged into one during 2009. The primary site for the SCADA system is now based in Leopardstown and the Disaster/Recovery site is located in the SDCC site in Wilton.
- The SCADA Load Flow module and the inter-connected 38kV network model were delivered and tested for the NDCC 38kV network. Similar work for the SDCC is in progress and will be delivered during 2010.
- The interface between SCADA and OMS (Outage Management System) was delivered with full client level navigation between applications.
- A total of 180 new Distribution Automation Devices (Soule / Nulec) were connected to SCADA and a further 200 devices had their older GSM modems replaced by GPRS modems.
- The link between ESBN DCC and the Eirgrid NCC was upgraded from an Elcom link to ICCP and a fully resilient network routing for Eirgrid NCC to ESBN DCC SCADA communication was installed .
- A number of enhancements were made to the HV Voluntary Outage management intranet application.
- Towards the end of 2009 a project was commenced to install, configure and deploy a dedicated storage area network (SAN) for OMS in the two data centres (SDCC & NDCC). This work will be completed during 2010.
- An OMS Notice Board intranet application was developed for Call Centre Agents to provide up to date and accurate information about the progress of OMS outages and / recently restored outages.
- The OMS online intranet application was enhanced to provide “easier to use” dialogs and menus with a graphical dashboard screen for a national overview of outage information.
- Improvements were made to the Customer and Network data interface from OMS to the Intelligent Voice Recognition (IVR) system. All customer and network data was brought up to date. A prioritisation enhancement was developed and tested for “Vulnerable Customers”, this will be going live during 2010.

IWM (Integrated Work Management)

A new Integrated Work Management (IWM) IT system went live in July 2009. This is a very important system which 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 fully implemented, IWM will allow the retirement of a number of legacy systems such as DWMS, TA database, and PMI workbooks.

10.0 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 ESBN 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 ESBN 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 ESBN 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 ESBN livery or be clearly identified as working on behalf of ESBN.
- ESBN 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 number of the customer contact centre is available via briefing material to all team members and is printed on every DSO vehicle.

11.0 Service Level Agreements

There are three market roles that ESBN performs that are central to supporting a fully open market; these roles are the Meter Registration System Operator (MRSO), 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. They set out performance standards which the DSO must strive to achieve and report on, as laid down in Condition 13 of the DSO licence. As provided in that Condition, the standards and/or targets of performance may be determined by the CER from time to time.

Performance against SLAs:

Performance against SLAs was in general very good. Significant progress was made in 2008 and these levels were generally maintained in 2009. In addition the key target of achieving one actual meter reading per year in 98% of cases was met. This is a very high level of performance and is challenging and costly to achieve due to issues of access against the backdrop of increases in vacant buildings and remote unmanned sites, such as mobile phone masts.

Out of 42 standards, 32 were met. In most of the exceptions, performance was marginally outside of a very demanding target e.g. no consecutive block estimates in 98% of cases vs. a target of 99%.

As in 2007 and 2008, MRSO met or exceeded all standards in transmitting timely data to the Single Electricity Market (SEM). The other standards for MRSO were met or exceeded in all but one case. (The exception involved a small sample where access could not be obtained in 3 cases.)

In addition, all standards for quoting customers for a new connection and connecting them on receipt of the ElectroTechnical Council of Ireland (ETCI) cert were met.

SLA Report

The Service Level Agreement (SLA) Report in the following Tables contain the complete set of results for 2009. 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 2009. The target for the number of transactions to be completed within the SLA timeline for all SLAs with the exception of 14 A and 14B is set at 95%. The target levels for 14A and 14B are stated in the comments column of the table. The Comments column is used to provide an explanation of the reason why the actual performance has not reached the set performance target.

Terminology used within SLA Report

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

Special Read – In some cases a supplier may request ESBN 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.

TABLE 10 Change of Supplier

Market Processes		Standard Approval timelines (SLA)	Actual Performance		Comments
Description	No.		Within SLA timeline	Within twice timeline	
Change of Supplier(NQH)	**1A**	Validate within 5 days	100%	100%	
	1B	Using customer read - Complete within 3 days	99.29%	99.7%	
	1B	Using special read - Complete within 10 days	71.00%	100%	100% achieved Q 1 & 2. Q 3 & 4 achieved 42% but this is for a total of just 5 special reads where 3 were twice SLA timeline due to access issues
	1B	Using scheduled read - Complete within 3 days	97.36%	98.32%	
Change of Supplier(QH)	**2A**	Validate within 5 days	99.84%	99.84%	
	2B	Complete within 3 days	99.29%	99.43%	
Change of Supplier Cancellation	**3A**	Validate cancellation within 5 days	100%	100%	
	3B	Complete cancellation within 5 days	100%	100%	

TABLE 11 New Connections and Connection Agreements

Market Processes		Standard Approval timelines (SLA)	Actual Performance		Comments
Description	No.		Within SLA timeline	Within twice timeline	
New Connection and registration with supplier (NQH)	**5A**	Prepare Quote- Within 7 working days where no site visit required. Within 15 working days where site visit required	98%	100%	Calculations for this SLA were based on records for quotations issued within customer charter guidelines
	5B	Complete connection- Within 10 working days of receipt of ETCI certificate.	98%	100%	
	5C	Data Processing – Issue details to Supplier within 10 Days	97%	99%	
New Connection and registration with supplier (QH)	**6A**	Prepare Quote- Within 7 working days where no site visit required. Within 15 working days where site visit required	98%	100%	Calculations for this SLA were based on records for quotations issued within customer charter guidelines
	6B	Complete Connection- Within 10 working days of receipt of ETCI certificate.	98%	100%	
	6C	Data Processing – Issue details to Supplier within 10 Days	97%	100%	
Change to meter point characteristics	**8A**	Prepare quote- Within 7 working days where no site visit required. Within 15 working days where site visit required	98%	100%	Calculations for this SLA were based on records for quotations issued within customer charter guidelines
	8B	Complete change- Within 10 working days of receipt of ETCI certificate.	98%	100%	
	8C	Process Change- Issue details to Supplier within 10 Days	95%	97%	

TABLE 12 Meter Works

Market Processes		Standard Approval timelines (SLA)	Actual Performance		Comments
Description	No.		Within SLA timeline	Within twice timeline	
De-energisation of Meter Point	**9A**	De-energise within 5 days	79.84%	90.79%	Conflict between SLA which requires work done within 5 Working Days and CER Code of Practice which states that disconnections for Non Payment of Account (NPA) are not to be carried out on Fridays. Single SLA Calendar in SAP. Actual Performance is approx. 8 % points higher
	9B	Issue Meter details to Supplier within 10 Days	98%	99%	
Re-energisation of Meter Point	**10A**	Re-energise within 5 days	95.60%	97.61%	
	10B	Issue Meter details to Supplier within 10 Days	99%	100%	
Change of Meter Configuration	**11A**	Reconfigure within 5 days after the receipt and validation of Supplier request	86.50%	92%	The majority of the calls that were outside standard occurred in one area and were due to resources issues
	11B	Process Data within 10 Days	98%	99%	
Meter Problems and Reports of damage	**12A**	Repair or Replace faulty meter within 5 days	71.25%	82.55%	Large number of Duplicate entries. Majority of Calls generated by meter readers and are not strictly customer service requests.
	12B	When a faulty meter is Repaired or Replaced- Process Meter Data within 5 days	93%	97%	Significant improvement on 2008 outcome - 526 Service Orders outside SLA

TABLE 13 Meter Data

Market Processes		Standard Approval timelines (SLA)	Actual Performance		Comments
Description	No.		Within SLA timeline	Within twice timeline	
NQH Meter Reading	**14A**	Scheduled Read-Distribution of Reads to Suppliers within 7 days	99%	100%	
	14A	2 Scheduled reading visits per annum	100%	N/A	Within SLA timeline target is **100%**
	14A	4 Scheduled reading visits per annum	92%	N/A	Within SLA timeline target is **97%.** The meter reading year changed to a calendar year in September 2009. Prior to this the year ended on the 31st of March. The next fully accurate figure that can be measured will be at the end of the 2010 calendar year. The result achieved for March 2009 was 96.102%
	14A	Actual reads for scheduled meter reading visits	85%	N/A	Within SLA timeline target is **80%**
	14A	Actual reads for scheduled MD meter reads	98%	N/A	Within SLA timeline target is **98%**
	14A	One actual read per annum	98%	N/A	Within SLA timeline target is **98%**
	14B	No Consecutive Block Estimations	98%	N/A	Within SLA timeline target is **99%.** Considerable improvement on 2008 performance
	14B	No Consecutive MD Block Estimations	100%	N/A	Within SLA timeline target is **100%**
	14C	Out of Cycle Customer Read- Readings processed within 3 days	94%	98%	13.25% increase in out of cycle reads in 2009
QH Data Collection	**15A**	D+4 QH data-Send to SEM-O / Suppliers in 1 workday	100%	100%	
	15B	QH Actual Data	On D+4		Within 10 days
		Send to suppliers within 4 and 10 days**	99.24%	99.4% ***	**SEM Timeline *** Based on a sample of the Data
Request for Special Read	**18A**	Site visit by 7 days	79%	100%	Process to be reviewed in 2010. Following the opening of domestic competition requests for special reads have increased significantly (+ 86% on 2008).
	18B	Issue of Meter details within 3 Days	65%	100%	See 18A

TABLE 14 Miscellaneous MRSO Processes

Market Processes		Standard Approval timelines (SLA)	Actual Performance		Comments
Description	No.		Within SLA timeline	Within twice timeline	
Data Aggregation	**16**	Issue of aggregated data to SEM-O/TSO/Suppliers and Generators within 5 days	99.00%	N/A	
Change of SSAC	**20**	Complete process in 3 days	100%	100%	
De-registration	**21**	Auto Completion within 5 days	100%	100%	
		Manual Completion within 10 days	100%	100%	

TABLE 15 Change of Customer

Market Processes		Standard Approval timelines (SLA)	Actual Performance		Comments
Description	No.		Within SLA timeline	Within twice timeline	
Change Customer Details	**24**	Complete within 5 days	100%	100%	
Change of Legal Entity	**25**	Complete within 5 days	99%	99%	

12.0 Records and Reporting

Table 16 serves to illustrate the sections of this report that meet the requirements of Condition 17 Records and Reporting.

TABLE 16 Compliance Matrix

Clause		Requirement	Performance Report Reference		
No.	Title		Ref.	Page No.	Comment
13.3	Performance of the Distribution Business	Review of criteria	2.2	6	
13.4		Report annually on performance	Entire report	-	
13.5		Publication of criteria	2.1	6	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	8.3	29	
		8 Meter Point Registration Service	8.2	29	
		9 Provision of Metering and Data Services	8.1	29	
		13 Performance Reporting	Entire Report		
		14 Access to Land or Premises	10	39	
		15 Customer Service Code and Complaints Handling Procedure	3.2.1 3.3.1	9 9	
17.3		Report annually on performance	Entire report	-	
17.4		Publication of Report	2.1	6	
17.5		Presented in a standard form to be approved by the CER	2.2	6	

13.0 Compliance with licence requirements

The Compliance Officer for ESBN has submitted a Compliance plan to the CER. 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 licence. To support this, records are maintained of compliance activities under each clause of the licence. These records are subject to internal audit.