

Our Ref: DSCT/RS BRL/KnowledgeCentre

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SENT BY EMAIL
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Dear Patrick

ACCESS AND FORWARD-LOOKING CHARGES SIGNIFICANT CODE REVIEW: CONSULTATION ON UPDATES TO MINDED TO POSITIONS

Thank you for the opportunity to comment on your SCR updates to minded to positions.

2. Distribution connection charging boundary

Question 2a:

- i Do you believe that it is necessary to introduce a High-Cost Cap (HCC) for demand, and to retain one for generation?

This is probably a suitable protection for DUoS billpayers.

- iv What are your views on the principles we have proposed to determine an appropriate HCC level for demand, including the potential for this to be set at a different level to generation under these principles?

As per our earlier response it is our view that demand and generation should be treated equally in terms of connection costs.

Question 2e: Do our updated proposals to treat storage in line with generation for the purposes of connection charging simplify charging arrangements for these sites and better align with the broader regulatory and legislative framework?

Yes, we agree with your updated proposals to treat storage in line with generation for the purposes of connection charging.

3. Access rights

Question 3a: Do you agree with our proposal to exclude customer interruptions and transmission constraints from the definition of curtailment with respect to distribution network access arrangements?

Yes, we agree, this seems to be a clear approach that avoids overlap. The national connection conditions will need to be updated. Ideally, we would like to see financially firm access at distribution connected generation. We regularly ask DNOs we are in contact with to look to update connection T&Cs in line with DSO and increasing flexibility on the network but continue to be sent



offers on the basis of “national connection conditions”. Please see an example of a queries on one connection offer we have raised below.

1. Your quote includes the statement “we may curtail the actual export and / or import, as appropriate, at any time in order to ensure the safe and efficient operation of the Distribution system”. We are not comfortable with this very broad statement, curtailment of generation is a service provided for a price to network operators (e.g., ODFM), we would not expect to be curtailed except in an emergency or a fault on the single circuit feeding us. Please can you tell us how this is covered by your T&Cs especially as you are now moving towards a DSO model?
2. As per item 6 section 2.3.2A includes a statement on NGET constraints. As per above we are not comfortable with this very broad statement, curtailment of generation is a service provided for a price to network operators (e.g., ODFM), we would not expect to be curtailed except in an emergency or a fault on the single circuit feeding us. Please can you tell us how this is covered by your T&Cs especially as you are now moving towards a DSO model?

Question 3b: Do you agree that the curtailment limit should be offered by the network based on maximum network benefit and agreed with the connecting customer?

Yes, we agree, network operators are in the best place to work out a suitable curtailment limit. In our experience they have not all been well set up to do this to date.

Question 3c: Do you have any views on the principles that should be applied to ensure curtailment limits are set in a consistent manner?

We are concerned that Network Operators will be cautious in how they calculate and offer curtailment limits. This may lead to some projects being considered not viable and not going ahead, slowing progress to net zero. How would ofgem propose mitigating against this cautiousness?

Question 3g: Do you have any comment on our proposal not to further define or standardise time-profiled access arrangements?

We again are concerned that without an ofgem framework this kind of access offer may be slow to develop as network owners may approach this kind of solution with caution and not want to develop arrangements alone, DNOs across GB should offer the same or similar products.

Banks Renewables are members of Renewable UK, Scottish Renewables and IREGG, please see their responses for further detail and for questions we have not covered.

Yours sincerely

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