ofgem
Making a positive difference
for energy consumers

Response template – Incentive on Connections Engagement

1.1 We are seeking views on how well the DNOs have engaged with their large connection customers to ensure they are delivering a service that meets these customers' needs.

1.2 The questions we have asked are directly linked to the minimum criteria set out in the ICE guidance document. You can find this on our website here.

1.3 We have added an optional section for additional comments and considerations, which is an opportunity for you to provide extra feedback or evidence that you may want to share with us.

1.4 If you have any questions on this document, please contact connections@ofgem.gov.uk.

1.5 **Responses should be sent by e-mail by 16 August 2022 to the address above.**

1.6 Unless marked confidential, all responses will be published by placing them in Ofgem's library and on our website www.ofgem.gov.uk. Respondents may request that their response is kept confidential. Ofgem shall respect this request, subject to any obligations to disclose information, for example, under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004.

1.7 Respondents who wish to have their responses kept confidential should clearly mark the document/s to that effect and include clear reasons for confidentiality. We ask you to consider this carefully as sharing the comments with the relevant DNO may help improve their performance and ensure a transparent and effective ICE process. Respondents are asked to put any confidential material in the appendices to their responses.

1.8 We will consider the responses to this consultation and these will be used alongside other evidence for our assessment of the ICE plans.

1.9 Each of the questions asked by this consultation is set out in the template below.

1.10 **Please ensure that you indicate the DNO or specific licence area** to which your experiences relate. Please note that Northern Ireland is not subject to this consultation.

1.11 When considering your responses to these questions, please consider your experiences, the actions that the DNO has undertaken or committed to undertake, and the actions that you consider it could reasonably undertake.

1.12 **Please make sure you highlight which year a specific event happened in. The regulatory year runs from 1 April to 31 March**.

Annex: response template

<table>
<tr><th colspan="5">About you and your work</th></tr>
<tr><td>What is the name of your company?</td><td colspan="4">Centrica</td></tr>
<tr><td>Is your response confidential? Please explain which parts and why.

For a fair process, we prefer the DNOs to be able to respond to any comments made, particularly if they are negative. Please consider carefully before marking any part of your response confidential.</td><td colspan="4">No</td></tr>
<tr><td>Which DNO’s ICE submission is your response related to?

If you wish to provide a response to the ICE submission of more than one DNO group, please use a separate template for each group.</td><td colspan="4">UKPN – all regions</td></tr>
<tr><td rowspan="7">What type of connection do you generally require?

For each type of connection, how many applications have you made in the past year, and what is the total MVA (Mega Volt Ampere)?</td><td colspan="2">Type of connection</td><td>Total number of connections</td><td>Total MVA of connections</td></tr>
<tr><td rowspan="4">Metered Demand Connections</td><td>Low Voltage (LV) Work</td><td colspan="2" rowspan="2">We provide some feedback on our experience as a large volume installer of EV charge-points across DNOs.

Our DNO-specific comments are mostly on our DG HV and EHV connections.</td></tr>
<tr><td>High Voltage (HV) Work</td></tr>
<tr><td>HV and Extra High Voltage (EHV) Work</td><td></td><td></td></tr>
<tr><td>EHV work and above</td><td></td><td></td></tr>
<tr><td rowspan="2">Metered Distributed</td><td>LV work</td><td></td><td></td></tr>
<tr><td>HV and EHV work</td><td colspan="2">This response covers HV and EHV DG connections.</td></tr>
</table>

	Generation (DG)			
	Unmetered Connections	Local Authority (LA) work		
		Private finance initiatives (PFI) Work		
		Other work		

Section 1: Looking Back report 2021/22								
We want your views on how well the DNOs have engaged with connections stakeholders over the last regulatory year								
1. How many of the DNO's stakeholder engagement events have you been invited to this year? (This can include engagement outside official events.) Please tick a box.	none	1	2	3	4	5	6	>6
						x		
2. How many DNO Stakeholder events have you been to? This can also include meetings outside of official engagement events. Please tick a box.	none	1	2	3	4	5	6	>6
					x			
3. Tell us about how the DNO engaged with you: **a)** What did the DNO do? **b)** How did the DNO do it? **c)** Did the DNO have a robust engagement strategy?	UKPN holds regular engagement forums for DG and DER customers. UKPN has also been holding stakeholder sessions for its Regional Development Programme (RDP) development in the East of England.							
The DNO's work plan								
4. *Objectives:* Have you seen the DNOs work plans and the objectives they outline? **a)** Does it take into consideration your needs? If so, how? **b)** If it doesn't please explain why.	Yes a) Initiatives were prioritised with the input of stakeholders. Ranking was discussed at stakeholder workshops. The initiatives align with our key asks. There was a mix of implementing regulatory required or industry agreed changes, plus initiatives that were unique to UKPN.							

5. *Actions:* Do you think the DNO has delivered its work plan? **a)** How has the DNO done this? **b)** If you do not think the DNO has delivered its work plan, please explain why.	Yes a) UKPN gives detailed explanations of how each initiative was delivered. We also recognise delivery of these initiatives in the areas where we are active.
6. *Outputs:* Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Did the DNO meet these outputs? Please explain why.	Yes. The status updates on **how** outputs were delivered are more detailed that many other DNOs, which is helpful.
Your feedback on the DNOs stakeholder engagement performance	
7. Do you think the DNO's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders?	Yes. The make-up of the looking back actions aligns with the sort of improvements that we have been asking for.

8. How satisfied are you with the DNO's overall engagement performance? Please tick one box.	very unsatisfied	not satisfied	satisfied	very satisfied
				x

9. General feedback – please provide any further feedback on the DNO's engagement performance in 2021/22, not covered in your responses above.	• On Statement of Works, we have a feeling that UKPN could put in project progressions quicker to NG ESO. We would also welcome more regular updates on submitted project progressions/SoW. • Overall UKPN provides a good service for DG Connections. • Supporting EV Chargepoint installations – at the other end of the scale UKPN received excellent feedback from our team responsible for installing EV chargepoints and heat pumps. They said that the UKPN online portal was great and designed to make the service more efficient. UKPN is also ultra responsive to queries and requests concerning EV CP connections. We rarely have to chase UKPN for updates.

Section 2: Looking Forward plans 2022/23	
We want your views on what the DNO aims to achieve in the coming year	
10. Are you satisfied that the DNO has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	Yes.
11. Do you agree that the DNO has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the DNO provided reasonable and well-justified reasons? What other activities should the DNO do?	Yes The actions align with our needs, especially around improving information provision e.g. details of headroom at GSPs; information to support curtailment forecasting and, looking forward, preparing to share digitilised network capacity and location data. We strongly support the introduction of SLAs for customer connection journeys – these help us deliver a better service to our final customers.
12. Do you consider that the DNO has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?	The measures are clear and appropriate and detailed.
13. Would you agree that the DNO's proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If not, has the DNO provided robust evidence that it has pursued this engagement?	The strategy is clearly informed by stakeholder needs. It has also been discussed at stakeholder engagement sessions.

Section 3 (optional): Other comments and considerations	
This is an opportunity for you to provide extra feedback on specific areas	
14. Would you like to share any other comments or any further considerations on how you think DNOs could better meet the needs of all larger customer types?	In this section we provide a summary of what DNOs **as an overall group** could do to better meet the needs of all larger customer types. There needs to be a concerted effort by DNOs (working with Ofgem as needed) to address chronic capacity shortages on

	distribution networks; improve customer communications, overall transparency and processes where DG connections require transmission reinforcement (CMP298 may facilitate, but does not deliver this); review processes hampering the connection flexible assets (e.g. how storage is assessed); address inconsistencies between DNOs not being resolved e.g. A&D fees and charges for minor works for residential LCT (EV/HP) installations. There are staff and skills shortages impacting connections delivery at distribution and transmission level. Some DNOs services are being impacted more than others. These need addressing in time for the mass uptake of LCTs needed to deliver Net Zero. We want DNOs to actively implement the agreed ENA Queue Management (QM) Guidelines. Evidence of implementation is currently low. We note the ENA Open Networks Project WS2 P2 is due to report on QM monitoring in December 2022. DG projects can find themselves stuck in two separate queues – one for distribution reinforcement and the other for transmission works. We support the ESO in adapting the ENA QM guidelines for transmission (CMP 376 – as updated in July 2022) as well as considering a more fundamental reform of the connections process with the aim of providing a more joined-up process for DG projects with transmission impacts. The latter would need the cooperation and support of the DNOs and Ofgem. <u>DNO support for large volume installers of EV chargepoints and heat pumps</u> Our key asks for improvements across the DNO sector are similar to last year. • Service level standards and DNO communications have generally improved over the past twelve

	months. However, but we still spend a lot of time chasing for updates. • Some DNOs still appear understaffed. This mirrors our experience connecting DG at HV & EHV levels. • Best practice occurs where the DNO gives status updates throughout the customer journey. We want to avoid having to chase for updates because this ties up DNO time and our time. Ideally status-updates should be automated (i.e., via portals or API.) • Some DNOs still don't have accurate information on their LV network and fuse sizes. This creates delays. • We remain frustrated at the inconsistencies in the way DNOs charge or don't charge residential customers for works needed to enable their installation. There can even be inconsistencies within DNO regions. We note this issue was recognised in the recent BEIS Ofgem Electricity Networks Strategic Framework (p62) and Ofgem wrote to DNOs on 3 December 2021. We are not aware of any further progress. • Portals where we can self-serve save DNO and installer time. Some portals are better than others. We've supportive of the ENA's work to develop an industry-wide solution, building on the iDentify project.