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Response to the Consultation 'Connections end-to-end review'

UK Power Distribution is a licensed independent electricity distribution network operator (IDNO), operating since 2016 across Great Britain.

As a network operator, we look forward to reading the responses to the consultation, to understand how we can improve our services. We have not found it appropriate for us, as an IDNO, to answer the questions in detail, as these are targeted to customers who request a connection. We provide instead a list of issues that we frequently encounter as an IDNO, when adopting a new network, or when applying with a DNO, for generation, on one of our existing networks. These issues are not just ours: they eventually affect our customers' experience of the connection process.

We remain at your disposal to discuss any element of our response in detail if necessary.

Best regards,

Anne-Claire Leydier
Head of Regulation



Annex: Our input to the consultation

1. Much time could be saved if the requirements for the DNO to add generation capacity at the time of issuing a demand Point of Connection could be relaxed.

As things are, generation install and export capacity can only be given when a full G99 application is made, with the size, fault level contribution and manufacturer are known. This is rarely the case on new projects, at the time of the POC request, which involve multiple parties such as a developer, landlord, and consultant. Our experience is that even though all agree that generation will be installed, the full details of the generation equipment are only known when new landlords or tenants take possession of the building, several months down the line, and so no application to the DNO can be made at the time of the POC application. In other words, the current rules require developers to know the exact details of generation to be installed before an application can be made to the DNO, but this clashes with real life practices, meaning the ability to install generation on a site (and time and cost associated with it), can only be understood months after the demand POC has been made. This is detrimental to the connection customer, and also to the DNO, who would benefit from knowing as early as possible about upcoming generation applications.

In addition, and to give some context, our own statistics show that more than half of our sites with distribution warehouses, industrial units, or schools typically end up with solar photovoltaic on their roofs because developers are building to a certain sustainability standard, and because large international tenants follow the demands of their environmental social governance.

In order to address this issue, we would like to see the ability to make some form of generation application at an early stage, when not all the details are known, which would allow DNOs and IDNOs to manage their POCs and BCAs; and also manage customer expectations. This possibility was introduced as part of conversations around Developer Forecasting Transmission Capacity, but the concept was unfortunately dropped over the Summer.



2. Some technical standards related to generation application are not applied consistently amongst DNOs and within DNOs.

- The requirement, according to ENA EREC G5 to produce a harmonics study stage 3, instead of stage 2, for a generation application at 11kV, for a DNO/IDNO POC at 33kV: when the customer equipment is not directly connected at 33kV and successfully passes Stage 2 assessment, we believe, it does not qualify for a stage 3 study, but there are occasions, in such scenarios, when we have been asked to produce it.
- When generation export capacity is to be set at 0, the DNOs have different requirements, some being satisfied with the commissioning of a G100, others require their presence during commissioning alongside the IDNO, and some insist on the installation of a constraint panel or loss-of-mains schemes. While differences between DNOs are to be expected, we are finding inconsistencies among engineers within the same organizations, which can lead to confusion and inefficiencies.
- We often face challenges in submitting multiple G98 applications during the POC stage. DNOs frequently perceive multiple G98 applications as a bulk supply, prompting them to request G99 forms to be completed instead. Transferring an existing application form to another for the sake of process seems a waste of time: it is both unnecessary and causes frustration for ICPs. While it is possible to notify the DNO of G98 installations after the site is live, our approach differs from that of the DNOs: we maintain greater flexibility with cable sizing, and having prior knowledge of planned domestic generation can significantly influence and optimize the design.

3. We often lack visibility in the progress of land rights and would like to explore the possibility for standard response time.

We understand that securing landrights is a complex issue that often takes time, so are not expecting guaranteed standards on resolving these; instead, we would like to see a better effort from DNOs to acknowledge receipt of our initial submissions, and to respond to queries within an acceptable timeframe (i.e. a few working days). At present, although



the exception rather than the rule, it can sometimes take weeks before queries are answered, and there is nothing to hold the DNOs accountable to.

4. **We would like to explore the possibility of standardisation of landrights requirements across DNOs**

Landrights is often the main cause for delay on a project, and as such, is subject to a specific focus in our organisation. At present, each DNO's requirements can differ greatly. As an example, Northern Powergrid ask for landrights items as part of their new design approval process – in contrast to all other DNOs. Finding a way to standardise landrights requirements would go a long way to streamline processes and gain time where possible. In addition, and topical to the agenda of Net Zero, we would like to see a renewed effort to find a collective approach to electric vehicle landrights, which has also been discussed previously. We understand some of this may be covered in the 'Land rights and consents for electricity network infrastructure: call for evidence' from DESNZ.