

OFGEM End-to-End Consultation

Theme 1 - Visibility and accuracy of connections data and network capacity

Question 1a. Do you agree with the issues we have set out under Theme 1 - Visibility and accuracy of connections data and network capacity? Are there any other issues under this theme that we should consider or be aware of?

Yes.

Question 1b. Do you agree with proposal 1a (new regulatory requirement on single digital view tools)? Do you have any views on how this should be implemented?

I take the stance that not all digital information needs to be on one single tool, but that they should all easily be navigated to from a central page on OFGEM / the DNO etc. websites, with links to other organisations that border them geographically or are adjacent in the electricity system too. The data should be available via both a downloadable and a GIS/mapped format.

Question 1c. Do you agree with proposal 1b (new regulatory requirement on the creation of guidance / standards for data visualisation tools)? Do you have any views on how this should be implemented?

Yes. Data should be represented to the same scales and/or symbols for easy comparison, and all parties should provide a minimum of certain criteria (e.g. when upgrade works will be occurring, what current headroom capacity is for connections etc.)

Question 1d. Do you agree with proposal 1c (new regulatory requirement to provide connections data)? Do you have any views on how this should be implemented?

Yes, but the "regular basis" will need to be at least several times per year as the system may change rapidly as works to the grid occur.

Question 1e. What are your views on the completeness and discoverability of connections data that would be useful to you? Are the existing resources clear and transparent?

The data that is available through Northern Powergrid (our local DNO) is not sufficient for our needs currently, despite repeated contact with them.

We are a social housing association with 18,000 homes across County Durham and are looking at where is best suited to installing low carbon technologies like solar panels and air source heat pumps over the next few years. For this, we need to know where there is existing capacity on the grid to take the additional demand / generation, at the very least on a neighbourhood (street/postcode) basis. We can be flexible about where we deliver ASHPs over the next few years and would love to work strategically with NPG to find areas that can have low carbon technologies installed now without the need for upgrade works.

After that, it would be extremely useful for us to be able to submit our plans in bulk (addresses and rough ideas of what the generation/demand will be per household, with estimated install dates/years), so that they can be factored into upgrades. I request this rather than the specific application form that is submitted once specific works are due to be underway; we have an idea of what we will be doing, and where we will be doing it, for the next 30+ years, and this should be factored into grid upgrades.

It would also be useful to have data on where homes are looped, and when planned upgrade works are expected to occur and what the resultant capacity will be.

We have 18,000 homes that will be getting ASHPs over the next 25 years, and the majority of these will also receive solar panels, but so far engagement with NPG has not allowed us to work together with them strategically to plan installs and upgrades. These works are coming and strategic partnership will result in smoother and cheaper delivery for both housing associations and DNOs, but currently NPG refuse to process our supplied data on long-term strategic plans, and do not offer the necessary freely-available information to allow us to do their job ourselves either.

Question 1f. Is there additional connections data that would be of use but legal barriers prevent it from being published? If so, do you consider that there are solutions that would enable this data to be made available, for example by aggregating it to appropriate levels / anonymising it etc.

We often require data to a household level, and so aggregating or anonymising may not be suitable for certain tasks (other than identifying neighbourhoods suitable for solar panel / ASHP installation). Doing these for general view, and then having the full set of data for certain areas visible behind a registration (e.g. where social housing associations can sign a Data Sharing Agreement and register to view the data on their homes), may work.

Question 1g. Is there anything else regarding Theme 1 – Visibility and accuracy of connections data and network capacity that you consider we have missed?

Information on where upgrades are planned, alongside an estimated timescale, would be very useful for planning delivery of works to specific areas.

Need to be conscious of the potential for scammers using any publicly available information to target households. With our current energy efficiency schemes, we have had attempts from fraudulent businesses to enter residents' homes under the guise of surveys, and there is the potential that vulnerable households could be targeted with this (or at least the information used) to make a case that the home is suitable for/required to get costly investment (e.g. solar panels that are not installed/over-charged for).

Theme 2 - Improved standards of service across the customer journey (not including “minor connections”)

Question 2a. Do you agree with the issues we have set out under Theme 2 - Improved standards of service across the customer journey (not including “minor connections”)? Are there any other issues under this theme that we should consider or be aware of?

N/A - we deal exclusively with domestic and small non-domestic sites (albeit at a scale of ~18,000 homes across County Durham), and so will answer under theme 6.

Question 2b. Do you have any views on proposal 2a (general principles-based licence condition and supporting guidance around standards of service throughout the entire customer journey)? Do you have any views on how this could be implemented?

N/A - we deal exclusively with domestic and small non-domestic sites (albeit at a scale of ~18,000 homes across County Durham), and so will answer under theme 6.

Question 2c. Do you have any views on proposal 2b (new prescriptive condition(s) around standards of service)? Do you have any proposals for any specific areas of the connections customer journey that should be subject to such a requirement?

N/A - we deal exclusively with domestic and small non-domestic sites (albeit at a scale of ~18,000 homes across County Durham), and so will answer under theme 6.

Question 2d. Do you consider that any of the existing standards of service requirements set out in the regulatory framework for provision of specific products / services should be revised or removed? Do you consider that there is any duplication or overlap of regulatory requirements across the regulatory framework that needs addressed?

N/A - we deal exclusively with domestic and small non-domestic sites (albeit at a scale of ~18,000 homes across County Durham), and so will answer under theme 6.

Question 2e. Is there anything else regarding Theme 2 – Improved standards of service across the customer journey (not including “minor connections”) that you consider we have missed?

N/A - we deal exclusively with domestic and small non-domestic sites (albeit at a scale of ~18,000 homes across County Durham), and so will answer under theme 6.

Theme 3 - Requirement on networks to meet connection dates in connection agreements

Question 3a. Do you agree with the issues we have set out under Theme 3 - Requirement on networks to meet connection dates in connection agreements? Are there any other issues under this theme that we should consider or be aware of?

Yes.

Question 3b. Do you have any views on proposal 3a (strengthened principles-based licence condition around meeting connections dates)? Do you have any views on specific wording that would achieve the intended outcome?

Agree with proposal - there should be requirements for both sides to meet connection dates so far as it is within their control to do so, and to inform at regular intervals and when changes to the timeline occur what the expected connection date is.

Question 3c. Do you have any views on proposal 3b (minimum standards / SLAs around meeting connections dates)? Do you have any views on specific standards that could be introduced and how they would work in practice?

Agree with proposal for minimum standards around dates and keeping customers informed, so that alternative plans can be arranged if necessary.

Question 3d. Do you have any views on proposal 3c (a financial instrument designed to offer recourse to connecting customers who face detriment due to delays)? Do you have any views on how this should be implemented?

I have a concern about whether financial penalties would drive the costs of connection up, as DNOs etc. must get the money from somewhere. It would also be interesting to consider incentives i.e. if a connection date deadline is set and it would not negatively affect the customer to connect early, then a payment is made (perhaps from central government) for a speedy connection ahead of the deadline, to incentivise rapid connections and greening of the electricity grid.

Question 3e. Is there anything else regarding Theme 3 - Requirement on networks to meet connection dates in connection agreements that you consider we have missed?

N/A

Theme 4 - Quality of connection offers and associated documentation

Question 4a. Do you agree with the issues we have set out under Theme 4 - Quality of connection offers and associated documentation? Are there any other issues under this theme that we should consider or be aware of?

Yes.

Question 4b. Do you have any views on proposal 4a (principles-based licence condition on the completeness / quality of the offer and supporting documentation)? Do you have any views on specific wording that would achieve the intended outcome?

No additional views.

Question 4c. Do you have any views on proposal 4b (minimum standards / SLAs on the completeness / quality of the offer and supporting documentation)? Do you have any views on specific standards that could be introduced and how they would work in practice?

Would a template response be appropriate, to ensure that all necessary categories of information are supplied within the timescale, along with sections to explain how "confirmed" this information is, and what would make it subject to change?

Question 4d. What do you consider would constitute a 'high quality offer'?

A live document that displays all information required to complete a connection provided, along with a rating of how certain that information is, which is updated and visible to the customer up until the deadline date at which point all information should be completed and confirmed.

Question 4e. Is there anything else regarding Theme 4 - Quality of connection offers and associated documentation that you consider we have missed?

N/A

Theme 5 – Ambition of connection offers

Question 5a. Do you agree with the issues we have set out under Theme 5 - Ambition of connection offers? Are there any other issues under this theme that we should consider or be aware of?

Yes.

Question 5b. Do you have any views on proposal 5a (strengthened principles-based licence condition around offering earliest achievable connection dates)? Do you have any views on specific wording that would achieve the intended outcome?

No additional views.

Question 5c. Is there anything else regarding Theme 5 - Ambition of connection offers that you consider we have missed?

Have an "earliest achievable connection date", but alongside this, a more realistic target, and a backstop date. This provides a window for customers to plan around; ideally it will be the earliest, but most likely to be the central date, with no delays occurring past the backstop date without compensation.

Theme 6 – Minor connections

Question 6a – Do you agree with the issues we have identified? Are there any other issues under this theme that we should consider? Please provide data and evidence to support your views if possible.

Yes. It would be useful to know if there are other, third party organisations that can be certified to carry out work to upgrade the electricity connecting a home to the wider grid, so that these

contractors be used and certification submitted to the DNO, rather than waiting with lengthy delays for the local DNO to complete upgrade works. The intention would be to still notify the DNO before and after, but if the lead-in time was significant then an alternative could be useful.

Again, we are a housing association with 18,000 homes across County Durham, and so whilst our installations are all minor domestic connections, we operate at a scale where we cannot plan these as a series of "one-off" installations. Information and support should be provided in a strategic partnership with Northern Powergrid (our local DNO) to enable us to plan out our routes and timelines to achieve net zero with minimal costs and delays.

Question 6b – What are your views on our proposals designed to address these issues? Are there other proposals you consider would achieve the intended outcomes?

6a - both proposal parts would be good.

6b - necessary to avoid postcode lotteries, but should be done in a way that improves performance, rather than regression to the mean.

6c - both monitoring and then reporting on the minimum standard achievement rates are needed for full accountability.

6d - as highlighted, existing consumer bodies such as the Energy Ombudsman exist, and should be publicised. Financial compensation for delays should be based on lost savings due to the delay plus a sum for the project management disruption - this is more easily done for solar panel delays but should be possible for other types too.

6e - if possible, safe, and without negative consequences, this would be useful to allow more LCTs to be installed without delay.

6f - notification could be tied in with MCS approval / certification, which should occur as standard for any solar panel or heat pump installation?

Question 6c – Do you have views on how poor performance could be addressed under these proposals to ensure the smallest scale customers are protected and LCT roll out is supported?

Installers could be made aware of the potential for actions in light of delays, and this can be passed on to the customer facing delays as they will most likely already be in contact with a specific installer by the time the DNO has been contacted. Installers could be reached through awarding and accredited bodies (e.g. Trustmark, PAS2035, MCS).

Working pro-actively would help to reduce delays too - social housing associations and local councils are leading the way for the install of LCTs due to the available government funding and central government targets surrounding EPCs and decarbonisation. Their housing stock is typically geographically concentrated, and so by working with them to upgrade the grid connections in these neighbourhoods first (both social and non-social homes on a street-by-street basis) then this allows for rapid deployment of LCTs across ~17% of housing stock, growing the market for further installs, and avoids having to re-visit the same streets when private rent / owner-occupiers later upgrade too, saving money overall.

Theme 7 - Provisions and guidance for determinations

Question 7a. Do you agree with the issues we have set out under Theme 7 - Provisions and guidance for determinations? Are there any other issues under this theme that we should consider or be aware of?

Yes.

Question 7b. Do you have any views on proposal 7a (Ofgem to review the guidance for connection determinations)?

A review, coupled with a commitment to review in future if/when the landscape changes again (perhaps by specified numbers) would seem sensible.

Question 7c. Is there anything else regarding Theme 7 - Provisions and guidance for determinations?

N/A

RIIO T3 – Electricity Transmission Network Incentivisation

Question 8a - What are your thoughts on each of the three ideas we have presented? In your response, please identify positives and negatives you see in each of the proposals, and if you have a favoured option and why that is.

Option 1 (post price control performance review) in my eyes seems to be fairest, with fewest uncontrolled risks.

Question 8b - With reference to our Future Considerations, do you have any further ideas on how TOs could be incentivised through a financial penalty and reward model, to deliver faster connections times, a more effective overall connections process in RIIOET3 and drive behaviours that have a positive long-term impact on the network

No further ideas