

# **Aura Power – Connections End-to-End Review – Consultation Response**

## **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?**

The issues set out under Theme 1 are all valid, however not exhaustive. Even with current datasets published and the progress made by the DNOs, it is key to note that DNOs are not held accountable for the inaccuracy of the data published, leading to poor decision making by developers that ends up costing significant sums of money. This includes but is not limited to fields being left empty in the ECR, or from experience being filled inaccurately. It is also key to note that for example, within SPEN's SLDs published within their LTDS, there is a significant level of lack of clarity in the SLD as they bundle the whole network in one very confusing SLD. There should also be consistency amongst all DNOs on use of symbols within SLDs to avoid confusion as to what the different symbols stand for in each DNO's region.

**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?**

Proposal 1a is very ambitious and if done right would be very useful. However, it is sometimes beneficial when DNOs have inconsistent data to fully understand the source of each dataset as it helps assess reliability from previous experience. This is based on a reasonable assumption that data consistency from DNOs can be very unreliable especially in certain regions. This helps separate datasets that are known to carry more risk than others. For example SPEN and ENWL's ECRs are significantly poorer in quality than NGED's. The same applies to NPG's new gettingconnected tool, which while very useful, has been noted to not reflect up to date datasets. The blending of all datasets in one tool makes it more difficult to assess the risk of some of the datasets being poor, especially in infrastructure GSPs that are shared by two network areas interacting with one another.

**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?**

As mentioned in the previous response, it is not necessary to unite all single data visualisation tools into one tool, but it would be great if a template is issued to enable a familiar data visualisation tool between all networks. This could be enabled by the ENA establishing what this could best look like - UKPN's Network Operation Data Dashboard is a great example.

**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?**

Proposal 1c is critical, especially with the new connections reforms coming in. How this would be implemented would need to take into account the outcome of the connections reform process and accordingly what new datasets need to be available. This includes but is not limited to; current status of project, transmission connection date, when it has met its Gate 2 requirement or the window it has achieved the connection in, and most importantly for hybrid projects, their split of technologies as these would be in different pots. It would also be very beneficial to publish the single line diagrams with all contracted connections indicated on there to enable developers to better assess why different PoCs might not be possible, such as for P18 on a circuit that has a number of connections contracted.

**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 existing resources are typically far from clear and transparent. As mentioned in previous responses, some DNOs have unclear SLDs, most have inaccurate ECRs as well as new tools that are not being kept up to date. Applicant names on the ECRs are generally not accurate as well as installed capacity vs export and import capacities and split of technologies too. Registers such as the TWR if offered as per their intended use would be quite useful, especially if they could regularly be updated with progress on works to allow customers visibility on likelihood of delays.

**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.**

No comment

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

DNOs need to be held accountable to their data, especially by ways of compensating developers who rely on these datasets when they are misled due to the quality of them. A potential solution could be that grid application fees are waived if during the offer process it is revealed that the data being run through the software to assess the new connection is different from that published, hence resulting in developers being issued significantly different offers from what they had expected based on network analysis.

**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?**

Agree with all the issues raised under Theme 2 - Improved standards of service across the customer journey (not including “minor connections”). One thing worth mentioning is given the lack of projects continuing all the way to energisation previously as a proportion of the whole queue, there has been less experience even from within the DNO themselves on what a project being progressed beyond the initial stages requires. Things that have seen a decline recently include but are not limited to information requests taking extended periods of time to respond to, creating inefficiency and in some cases, blocking projects from progressing as key decisions are not able to be made. Some examples of this are things as simple as obtaining outage data, LIFO queue, requirements on LV supply, PoC for LV supply where issued within the same offer, etc.

**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?**

Proposal 2b is preferable to 2a, or both would be even better.

**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?**

Key areas that would be very useful to subject to a standard of service requirement are requests for meetings, especially where no recent meetings have been had to the point where this becomes null. Additionally, requests for information should be subject to a standard of service requirement to guarantee developers/generators that projects can progress in a timely fashion, hence not hindering their ability to achieve milestones. For example, obtaining new datasets for curtailment analysis and up to date LIFO queues. Additionally, in the later stages of project development/construction, requests to trigger surveys, ordering equipment, assembling a project team, tendering for works, arranging a kick-off call post planning consent, agreeing an energization date and getting variations with updated costs should all be subject to standard of service requirements to ensure minimal delays for energization dates. Penalties should be implemented where there is lack of engagement to ensure that at all stages projects are able to progress further.

**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?**

Not that we are aware of.

**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?**

Regarding the issues raised on Project Progression, these are historic problems that can only be addressed via Connections Reform and aligning queue positions by something more fair than the date NESO countersigned the offer. However, all future license obligations should focus on creating a clear cut-off date by which evidence would need to be submitted to the DNOs to pass on to the TOs/NESO within an application window. Another issue to consider is the inconsistency of standards across different DNOs. It would be preferable if all suppliers are accepted on all DNO networks, to ensure consistency across all DNOs. It has also been noted that some DNOs have varied implementations of ENA recommendations such as P18 Engineering Recommendation. UKPN seem to have additional stringent requirements causing them to have a unique P18 policy that is non-existent across all other DNOs. It has also been difficult when advance a development to be built within NPG's network as their design requirements on the cable route for example have been too stringent, forcing the customer to double the length of the cable route (increase of circa 2 kms at 132kV) and increasing costs due to the requirement to install said cable within public highway as opposed to within landowner fields that have sorted the necessary easements, pushing the costs up even further and not offering the customer the opportunity to connect at "the lowest cost option".

### 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?**

The issues set out under Theme 3 - Requirement on networks to meet connection dates in connection agreements are definitely agreeable. Networks are not held accountable for connection dates and this has resulted in significant delays from their end that are unjustifiable in most cases.

**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?**

It is unlikely that a strengthened principles-based licence requirement as stated in proposal 3a would have the desired effect in achieving the intended outcome. As seen by the varying wording between all the networks, none of them seem to be more adherent to the connection dates they issue than others. It depends a lot more on the team delivering the project, as we have seen even within different license areas of the same DNO.

**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?**

Proposal 3b is likely to be more favorable than proposal 3a and to better achieve the intended outcome.

**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?**

Proposal 3c could have a very positive effect in achieving the intended outcome as it would best hold DNOs accountable and incentivize them to be held to the dates they indicate. This however could lead to adverse effects of DNOs and TOs issuing significantly unreasonably delayed dates to offer themselves maximum security. To combat this, Ofgem should have a clear route of escalating contesting connection dates if DNOs are unreasonably prolonging them. This would indeed also offer recourse, although likely not fully, to connecting customers who face detriment due to delays. This could be implemented by allowing NOs a reasonable “tolerance period” similar to that customers face with their milestones, after which a connection delay charge per MW per month delayed could be a potential route on how this is implemented.

**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?**

The key thing that has been missed is how securities and cancellation charges are taken from developers relative to their corresponding attributable works, however NESO do not update customers on the progress in said works. This should be key in helping communication with customers and enabling their understanding of potential delays to connection agreements. This ties back to data transparency discussed in Theme 1.

## **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?**

The issues set out under Theme 4 - Quality of connection offers and associated documentation are all agreeable, however not exhaustive. Other issues faced with the quality of connection offers is that quite frequently some DNOs will add in significant reinforcement to an offer (sometimes in the tens of millions), while verbally discussing with the customer that these are not actually triggered by the customer, however are there in the unlikely event that the customer becomes a triggering party if a certain number of connections fall out of the queue. Also, some DNOs do not easily issue historical outage data relevant with the offer that could help the site assess the frequency of potential outages where they can no longer generate. Additionally, costs seem to be a “finger in the air” figure given by all DNOs and can vary by as much as 300% as can be seen by recent developments with SSEN being built out. Connection costs also seem to not be scrutinized as much as DNO’s capital costs leading to higher unit costs to connection customers. An example of this is within SSEN where they have subcontracted entire regions’ works at very high costs and without defining per unit costs on key items, leaving customers with prices from contractors that are multiples of what is considered reasonable and what these same

contractors tender at for the same projects' contestable works. DNOs in most cases fail to issue all relevant curtailment data with the offer, that in some cases can make an offer economically unviable and are key to assessing and take time.

**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?**

Unfortunately, it is unlikely that proposal 4a would have a notable effect on the completeness and quality of offers issued to customers. It is more likely that proposal 4b would be more effective.

**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?**

Proposal 4b is likely to be more effective in addressing the issues outlined in Theme 4. Specific standards could be applied to constitute what documents are required to be issued to customers at time of offer, e.g. historical outage data, curtailment data, LIFO queue, detailed cost breakdown. The reliability of cost breakdown needs to be to a higher level and any variations that are more than a certain percentage need to be fully justified and have a clear route of escalation. Networks need to be held accountable to justify all reinforcements listed and what exact projects are triggering those, correlated to the ECR or other available datasets, allowing the customer to better understand risks within the offer.

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

A "high quality offer" is one that does not require a significant number of variations down the line and provides full detail and all required data at point of offer. These datasets may obviously be updated with time, however should not vary significantly from originally issued documents that aided in making business decisions to progress projects forward.

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

No comment.

## 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?**

The issues set out under Theme 5 - Ambition of connection offers are agreeable. Potentially one other thing to consider is in some cases lack of clarity on what could improve offer

conditions (project on the same line dropping out allowing a teed connection instead of looped for example) to be able to better hold the networks accountable for potential improvements.

**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?**

Proposal 5a is great and should help alleviate the issue highlighted by Ofgem and within our response to Theme 3. Potential wording that could achieve the desired outcome can be outlined what the most common methods of connection and reinforcements are and agreeing reasonable timescales for those, with any deviations being justified otherwise.

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

No comment.