

Electricity North West

304 Bridgewater Place, Birchwood Park,
Warrington, Cheshire WA3 6XG

Telephone: +44 (0) 1925 846999

Fax: +44 (0) 1925 846991

Email: enquiries@enwl.co.uk

Web: www.enwl.co.uk

Gareth Evans
Head of Profession - Engineering
Office of Gas and Electricity Markets
9 Millbank
LONDON
SE1P 3GE

Direct line 01925 846863
paul.bircham@enwl.co.uk

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Dear Gareth,

Long Term Development Statements for Electricity Distribution Networks – Consultation on the Form of Statement

Thank you for your letter dated 8 June in which you ask for comments on the Form of Statement (FoS) of the Long Term Development Statements (LTDS) for Electricity Distribution Networks.

Introduction

The production of the LTDS is a resource intensive exercise. It requires compilation of information from separate corporate systems such as asset registers, geographical records, system analysis software and business plans. The technical data content required for the LTDS is comprehensive but not exhaustive. Scope is limited to the grid and primary distribution networks, where technical and financial considerations are generally more critical. We provide below general comments followed by detailed comments on the issues raised in the consultation.

A. General comments**1. Role of LTDS in the connection of distributed generation**

We believe that the current scope of LTDS is sufficient to allow high level planning for connection of distributed generation (to the EHV and 132kV network) that may be carried out by external parties before contacting us for an in-depth study. Extending LTDS data to the lower voltages to assist in the DG connection process will result in an exponential increase in the cost of producing and maintaining the LTDS. Given the continually changing and developing nature of the HV and LV networks, frequent updates would need to be provided. The cost of such updates would be significant and difficult to justify.

2. Scope of LTDS document

Electricity North West is in agreement with Ofgem's decision that it would be inappropriate to mandate the extension of the LTDS to cover HV networks.

3. Consistency of approach amongst DNOs in meeting FoS requirements

Electricity North West believes Ofgem guidance on the form of the LTDS is sufficient to ensure consistency amongst DNOs in meeting SLC25 requirements.

4. Reference to connection costs

The Form of the Statement on Ofgem's website makes reference to connections costs. This should be removed as it duplicates information in the Connection Charging Statement where the recently approved common template now places additional obligations on DNOs.

B. Detailed comments

Comment Number	FoS Change Proposal	Need for Required LTDS Output
1	<p>Actual data (geographic and electrical) Electricity North West would support provision of network electrical data in an electronic format (spreadsheet/database) that allows easy manipulation, collation and import into network modelling software.</p> <p>We believe that for security reasons any detailed data should be on a password protected area on the DNO website.</p>	Improved ease of use for LTDS users
2	<p>Common electronic format for network data in LTDS Electricity North West favour provision of network data using a common DNO template and in an electronic format (spreadsheet / database) that allows easy manipulation, collation and import into network modelling software.</p>	Improved ease of use for LTDS users
3	<p>Common publication mode and access to LTDS Electricity North West already provides free website access to the LTDS with free user registration required to gain access to the detailed information which includes the network data. There is a need to consider the security implications of allowing website access to the detailed information and possible use of the data for nefarious purposes.</p>	Improved ease of use for LTDS users
4	<p>Information on connections activity The requirements given on page 12 of the current FoS to report on connections activity may be duplicated in the proposed DG information strategy. Electricity North West therefore proposes that this requirement be removed from the FoS.</p>	Removal of possible duplication with other obligations
5	<p>Frequency of update of LTDS Electricity North West would support provision of a section that details relevant new connections made since the last annual LTDS update. This section would be updated whenever a relevant new connection is made. However, it is not anticipated that the changes arising from new connection will be reflected throughout the Statement until the annual update is completed.</p>	Allows LTDS users to have an up to date view of connections activity on the network.

Electricity North West would be happy to participate in an industry working group inclusive of Ofgem representatives to discuss consistency of approach amongst DNOS in meeting FoS requirements, common formats for LTDS data, frequency of updates, website publication mode and access as we feel this would provide a more user-friendly LTDS.

I hope you find these comments helpful. As always, we will be very happy to discuss any aspect of our response with you.

Yours sincerely,

Paul Bircham

Customer Strategy & Regulation Director