

## LowC making low carbon communities happen

Ofgem  
9, Millbank,  
London  
SW1P 3GE

You ref : 71/10  
Our ref :

14<sup>th</sup> June 2010

For Attention : Mr G Evans  
Head of Profession – Engineering

Dear Sirs,

### **71/10 : Long Term Development Statements for Electricity Distribution Networks- Consultation on the Form of Statement.**

#### **Background**

We thank you for the opportunity to respond to the above consultation document. LowC Communities is actively involved in CHP, distributed generation and the load connections market and also operates within both the consultancy and installation/connection environs.

LowC also participate in the ongoing electricity connections debates and are active within both the Electricity Connections Steering Group (ECSG) and Metered Customers Connections Group (MCCG).

#### **Preamble**

- 1) In the first instance it would be useful to clarify that most, if not all the DNO's have actually separated their SLC25 Documents into 2 sections (Part 1 and Part 2). Whilst Part 1 relates to general and generic connection parameters, and is generally available on a free of charge basis from each of the DNO's, we would point out that it actually contains little technical information that is of value to any potential network user.

We would confirm that it is the Part 2 Document that is of value and actually contains the technical information that defines the system parameters and the appropriate and relevant information to enable the recipient to investigate and review the network and any associated system constraints.

It is of relevance that it is the Part 2 Document that has, in the past, not always been placed in the public domain.

Therefore, in order to remove or alleviate any doubt, may we request confirmation that, with regard to this Consultation Document, it is Ofgem's intention that the documents under discussion relates to both Parts 1 and 2 of the DNO's SLC25 Documents ?

- 2) Following discussions at the March 2010 ECSG Meeting it was confirmed that the only DNO's that were failing to place their (full) SLC25 LTDS Documents in the public domain, and free of charge, were EdF and CE. It has been disappointing that the protracted discussion within this forum has failed to engender a change of mind on this matter.

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- 3) In the instances where the DNO's have installed the Part 2 Document on their website we would confirm that we still find it difficult in accessing / finding the documents and do not find them particularly easy to navigate.
- 4) It must be stated however that, in general, we do find the LTDS of significant value.

We believe that with the exception of Change Proposal 6 (below) there is little contained within the proposals / suggestions that would incur any significant additional costs or resource workload on the majority of the DNO's.

In the case of Change Proposal 6 we believe that any additional work would be minimal but would be worth undertaking if we are to expect a significant increase in requests for connection of additional distributed generation projects.

### **Consultation Workshop**

We confirm that we would be interested in attending a consultation workshop if this would assist Ofgem in finalising their conclusions on this issue.

We would further suggest that in order to optimise the benefit from any workshop the format should be based on acknowledging and addressing the individual issues and points raised within each of the consultation responses.

### **Conclusion**

We trust the above response is both suitable and reasonable however should you wish to discuss the contents or require any further information please do not hesitate to contact me.

**Yours faithfully,**

**R C Weaver**

**General Manager  
LowC, Energy Services**

**Attached : Consultation Response**

## Consultation Response

This response relates directly to the Part 2 LTDS information provided by the DNO's (rather than the information provided within their Part 1 documents).

Comment No.	FoS Change Proposal	Need for Required LTDS Output
1	Availability	It is an existing condition that LTDS (SLC25) Statements should be made available and in the public domain. We welcome Ofgem's proposals within Consultation 71/10 that, pending the receipt of responses, that Ofgem are minded to require each DNO to make their LTDS available on their website and downloadable at no charge. We see this as a significant step forward as a means of rectifying this issue.
2	Scope and format of information provided within the LTDS	In general we are happy with the level of information / plans / schematics provided within the LTDS but believe that, in some cases the information could be 'rationalised' whilst not degrading the overall content of the document.
3	Schedule of Generators	Some DNO's already provide a schedule of generators connected to their networks within their LTDS. We would suggest that such a schedule should now be a requirement of all LTDS. We would further suggest that the generation information should be provided together with the associated capacity and point of connection. We would further suggest that this level of information would not infringe any confidentially constraints.
4	Common Electronic Format	We would suggest that a LTDS provided in a common electronic format would assist in transmittal, would be a cost effective method of providing the information and would greatly assist in updating and making / keeping the information current and up to date. So saying, there are in existence a number of LTDS that could serve as a 'generic template'.
5	Frequency of updating.	Please see above. We would suggest that information held within an electronic database could provide a platform for more timely and regular updates; these update provided more frequently than the current annual basis.
6	Extension of LTDS to include 11kv connections	Whilst the scope of the existing LTDS is confined to the EHV networks it should be noted that an ever increasing proportion of CHP and distributed generation is connected at voltages of 11kv and below. On this basis we would welcome discussion based on extending the scope of the LTDS to include DG at 11kv, perhaps in conjunction with also extending competitive connections to encompass the necessary system studies and establishing the network point of connection (PoC).

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