

Gareth Evans
Ofgem,
9 Millbank,
London, SW1P 3GE

Date: 20/07/2010

Dear Gareth,

**Long Term Development Statement (LTDS) for Electricity Distribution Networks –
Consultation on the Form of Statement**

RenewableUK (formerly the British Wind Energy Association (BWEA)) is the trade and professional body for the UK wind and marine renewables industries. Formed in 1978, and with over 600 corporate members, RenewableUK is the leading renewable energy trade association in the UK, representing the large majority of the UK's wind, wave, and tidal energy companies.

Overview:

The LTDS represents an important tool in supporting the development and connection to distribution networks of new generation. It is the distribution network equivalent of the Seven Year Statement. The concept of network information provision has been adopted at a European level with the ENTSO-E 10 year plan. The demands placed on the LTDS by an evolving GB electricity market will likely grow over the coming years, particularly in light of the recent introduction of new financial incentives (e.g. Feed-in tariffs) which are encouraging increased interest in 33kV and 11kV network connections. Many of the suggestions made in this consultation response build on existing process held by DNOs, but looks to harness greater support for anticipated and currently experienced connection activities, and deliver more clarity and coherence to the user/DNO interface via pragmatic and common sense improvements to current reporting practice.

We welcome the opportunity to comment on how the LTDS can continue to provide value in encouraging a more transparent, cost effective, and efficient process via which new generation can be connected across the UK distribution networks.

Specifics:

As requested in the consultation, please find below a tabulated list of proposed "Form of Statement" changes:

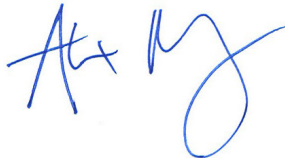
Comment Number	FoS Change Proposal	Need for Required LTDS Output
1	Expand of LTDS scope to include 11kV network.	New financial incentives will dramatically expand interest in 11kV connections. The

		LTDS should provide 11kV information in a similar fashion to the way 33kV information is currently provided. We recommend there is not strong requirement for such information to printed, only that this information is made electronically available, and placed in the public domain.
2	Develop a common electronic format for DNO LTDS publications.	Common formatting across all DNO LTDS publications will encourage greater accessibility, transparency, user engagement, cost efficiencies regarding future change management.
3	LTDS should include a published schedule of connections.	<p>New financial incentives will dramatically expand interest in distribution network connections. We recognise the availability of connection schedules would provide valuable insight and guidance to those planning future connection.</p> <p>The provision of connection schedules will deliver greater market transparency, and cost efficiencies across the generation project development cycle, through minimising project risk, development uncertainty.</p> <p>We do not recognise any confidentiality issue to be at stake in the provision of connection scheduling data. Any suggestion that this be a reason for non-release of pragmatically useful information should be closely scrutinised in the context of the high value of information release. If a proposed generation unit seeks confidentiality ahead of connection and after application submission, we suggest that a private network, as opposed to publicly shared, connection may best suit.</p>
4	LTDS electronic data should become “live”, and directly	Regarding the consultation question on how frequently LTDS information should be

	linked to internal DNO databases.	<p>re-issued, we would suggest the development of a “live” information sharing system. We presume internal DNO databank are updated on a “live” basis, and we see no strong reason such information cannot be made electronically available.</p> <p>The provision of an automated link between DNO databanks and that provided to interested parties is not a complex or costly administrative task, but would encourage not insignificant cost efficiencies within market practice.</p>
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We responded to the consultation invitation to express interest in a LTDS workshop, and look forward to supporting related discussion through sharing the view of our members.

Yours sincerely,
(by email)



Alex Murley, Head of Technical Affairs for RenewableUK