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Dear Gareth

71/10 - Long Term Development Statements for Electricity Distribution Networks – Consultation on the Form of Statement

Thank you for the opportunity to comment on the Form of Statement for the Long Term Development Statements (LTDS) for Electricity Distribution Networks. This response is provided on behalf of RWE Npower plc and RWE Npower Renewables Limited.

We believe the Distribution Network Operators (DNOs) LTDS to be a valuable resource, providing the majority of information that we require to assess the feasibility of generator connections to DNO networks. We consult the LTDS on a daily basis and without this resource we would be forced to request DNOs carry out numerous unnecessary feasibility studies. Although the LTDS broadly satisfy our requirements there are areas where they could be improved or where additional information would be beneficial. These areas are discussed in the attached table. Items we would particularly draw your attention to are:

- to include data for existing ***and*** contracted, but as yet unbuilt, generation (as NGET already do)
- improved and more consistent generator data
- improved and more consistent schematic and geographic diagrams

Yours faithfully,

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Comment number	FoS Change Proposal	Need for required LTDS Output
1	All contracted generation (i.e. with accepted Connection Offers) should be listed in the LTDS	At present most DNOs provide a table detailing the embedded generators that are connected to their system and in operation. However they do not provide any information regarding generators that have accepted Offers of Connection but are not yet in operation. When a DNO carries out a feasibility study into the connection of a new user they include these generators in their background system model. Without the provision of this information any assessments that we make are missing vital information. We have been told by some DNOs in the past that details of other users accepted Offers of Connection are confidential and cannot be released so as not to risk that users planning application. We do not accept this as an argument. It has always been our understanding that once an Offer of Connection has been accepted then it becomes public knowledge. In fact any party accepting an Offer of Connection with NGET is immediately included on the TEC Register (or Embedded Generator MW Register) and Electricity Transmission Networks Quarterly Connections Update.
2	Consistent provision of, and improvement to, generator data	At present most DNOs provide some information regarding the generators embedded within their networks. However it would be helpful if the data provided was consistent across all LTDS. It should include: • generator name, • generator size, • generator voltage, • point of connection onto the distribution system (not just the name of the GSP under which it connects). As previously stated this should be provided for all generators with a signed Offer of Connection and not just those that are operational. These generators should also be clearly marked on the schematics and geographical maps.
3	Improvements to schematics	The quality and usability of schematics provided by the DNOs varies. Many would benefit by showing the connection point of generation more clearly. The schematics of the NEDL and YEDL network are somewhat harder to use as some details appear to have been lost in the scanning process. The 33 kV schematics - block diagrams - provided in the LTDS for SPManweb are

		very different to those provided by the other DNOs and are not fit for purpose. We would prefer to see these schematics presented in the same manner as the other LTDS. We encourage DNOs to take advantage of developments in IT in preparing the LTDS, particularly with regards schematics diagrams. For example, schematics could include hyperlinks to relevant data, or allow circuit/generation/transformer data to appear in a 'pop-up box'.
4	Improvements to geographic maps	In general the maps provided by the DNOs are of a usable quality. We understand that it would be difficult for all DNOs to provide geographic maps in the same format; however it would be beneficial if they could provide a consistent level of information. They should all: • include background detail to help locate substations, • indicate whether circuits are cable or overhead line • clearly show the location of generators CE Electric also provides grid coordinates for their substations, which is very helpful in identifying their locations. At the other extreme, EDF EPN and SHEPD's geographic maps do not clearly or consistently show substation or generation locations.
5	Clearer links to the LTDS need to be provided on the DNO websites.	The ease with which links to the LTDS can be found on the DNOs websites varies. In most cases searching for Long Term Development Statement or LTDS on the DNO homepage provided a link to the correct page. However in the case of SEPD, SHEPD and United Utilities the LTDS could not be found. They could only be found by negotiating through the site, which was difficult and long winded, even when knowing what you are searching for. We have concerns that these documents are not given a higher prominence (such as the NGET Seven Year Statement which is linked on the NGET homepage) as this would make them more accessible to new developers who would benefit from them but may not be aware of their existence.
6	All LTDS (including detailed data) should be made available electronically and at no cost.	It is encouraging to see that all LTDS can now be obtained in electronic format rather than solely in hard copy. However the manner in which they are supplied varies across DNOs. Some will provide the documents by email, some on CD ROM and one (United Utilities) provides the data in a web based format. The costs for providing the LTDS also varies significantly from being free to £70 a copy.

		As the costs recovered will never be sufficient to cover the costs of producing the documents there seems little justification in charging arbitrary costs. It is reasonable for there to be a small charge for providing the LTDS on a CD-ROM or hardcopy to cover the cost of printing, P+P etc.
7	All LTDS (including detailed data) should be made available to everyone on the internet	LTDS Summaries are currently available to on the internet. However maps, schematics and detailed information are not publicly available. The manner in which the detailed data is provided varies across DNOs. Some provide the documents by email, some on CD ROM and one (United Utilities) provides the data in a web based format requiring a password. We do not understand why this information cannot be freely available on the internet. SEPD/SHEPD state that this is for security reasons. However, we do not believe that this is a justifiable excuse when the NGET Seven Year Statement is freely available on the internet.
8	All LTDS to be provided as stand alone documents either with or without separate tables, maps and schematics.	All but one of the LTDS are provided as standalone pdf documents either with tables, maps and schematics included or with separate tables (in pdf, Excel or both), maps and schematics. These are both clear and useful methods of presenting the information. There are benefits in providing all the information in one file in terms of searchability and easy file storage. However there are also benefits of having separate files for the tables, maps and schematics in terms of easier referencing between the files, easier data retrieval for use in modelling software etc. United Utilities provides the data in a web based format requiring a password, which we find to be much less user friendly in terms of finding information (e.g. we could not find any details of embedded generators), and usability when offline.
9	Quarterly updates to be provided	We understand that compiling the LTDS takes time and that the data has to be frozen some months prior to the LTDS being issued. This means however that the data presented is soon out of date. It would be extremely helpful if the DNOs were to publish quarterly updates (as NGET do to the Seven Year Statement) detailing changes and additions to the network and new connectees, both generation and large demand.
10	Improved tables of typical equipment parameters	The consistency and quality of the typical equipment parameters provided by the DNOs varies. Some provide very little data, if any. Others, such as Central Networks provide extensive tables detailing parameters for steel circuit and wood pole lines, cables, transformers and switchgear. We would like to see a similar approach taken by all DNOs.

11	Improvement to circuit data	It would be useful to know whether circuits are overhead line (steel tower or wood pole) or cable. Some LTDS show this on the geographic maps, or schematics but others don't. It would be helpful is this were done consistently across all the LTDS
12	Improvement to transformer data	It would be helpful to have more detail in the tables of transformer details that indicates if transformers are fixed tap what tap setting they are on, or alternatively what voltage they are controlling to.
13	11kV & 6.6kV data	We would strongly encourage any development on the provision and consistency of provision of 11kV (& 6.6kV) data. While it may be impractical to make this data available as part of the LTDS, it is apparent with the introduction of Feed-In Tariffs that 11kV data will be in greater demand. 11kV data is currently delivered on an ad-hoc basis by each DNO and in some cases can lead to significant delays of the order of months. One solution could be for DNOs to catalogue 'packages' of 11kV data (geographic, schematic, circuit, transformer, generation & demand data) for circuits or small groups of circuits, perhaps building the catalogue as applications are made. This could save valuable time not only for developers but also for DNO planning engineers.