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To Gareth Evans
Ofgem
By e-mail
CC Helen Snodin (XE), Nigel Scott (XE)

From Alistair M^cLaren
Date 23 June 2010
Ref LET 1123/001/001

CONSULTATION ON LTDS FORM OF STATEMENT

Dear Gareth,

Xero Energy (XE) is a renewable energy consultancy specialising in technical and regulatory grid related services. XE's engineering team is a regular user of the Long Term Development Statements (LTDSs) and this response comprises that team's observations on their user friendliness. I am myself particularly interested in the future of the LTDSs (and, indeed, other such documents), as my duties at XE encompass both power engineering and information technology.

The LTDSs are a valuable source of information when undertaking analyses and design work on a proposed connection. Although they are extremely valuable, the manner in which they are presented impacts on their utility. Our observations are as follows:

Common, consistent and machine readable data formats

As noted in your open letter, the LTDSs are presented in a variety of formats. Formats vary both between DNOs and between successive LTDSs of the same DNO. Furthermore, the formats used are not readily machine readable. Thus, it is not easy to import data and the lack of a standard data format actively discourages the development of data manipulation tools. We would wholeheartedly support standardisation of data formats across the LTDSs with a view to improving this situation.

Sanitised data

We find that the LTDSs can contain errors, omissions and contradictions. Part of any comprehensive overhaul of the current system should include incentives or imperatives to reduce, detect and correct errors. The validation process would, of course, be made easier by the use of a standardised, machine readable data format.

Frequent updates

Each LTDS is published once a year, suggesting that they may be up to a year out of date. However, the time necessary for the preparation of an LTDS is presently such that the freeze dates for the data can be up to a year earlier still. Thus, it is only safe to assume that the data is up to two years out of date. Given the increasing speed with which the distribution networks are changing, the potential utility of such data is clearly undermined.

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Although conditions among the DNOs will vary, it may be hoped that some at least will move to auto generation of the LTDS, which might in any case flow from procedures required to implement a standard data format and validated LTDSs.

Internet access

The current situation, where LTDSs are delivered by post, on CDs, is quite dated. Several DNOs have already demonstrated that distribution via the internet is entirely practicable. Recent complaints about "security" are difficult to understand. In any event, if there is a move to all DNOs providing internet access, we would suggest Ofgem collates the links on a page on its own website, to facilitate easy discovery.

Low or no cost

Requiring that the LTDS be made free of charge seems sensible, given that it is a key document in permitting access to the distribution networks. A case may also be made for the LTDS to be charged for, to prevent nuisance requests and cover the cost of publication. If this latter were to be the case, we would be in favour of Ofgem overseeing a maximum price. Of course, if the publication is by internet, the incremental cost per copy will be very low. Another option might be a modest yearly fee for membership of an "LTDS club", which would permit the use of all LTDSs. Indeed, this latter would permit Ofgem to impose penalties for poorly executed LTDSs, as suggested above.

In conclusion, the LTDSs are an extremely valuable resource, but are not, at present, afforded the care and attention they deserve.

I hope you find these comments useful and if you wish to discuss any aspect of this response further, please do not hesitate to contact me.

Yours sincerely,

Alistair M^cLaren