



**SOLAR
POWER**
GENERATION LTD

James Veaney,
Head of Distribution Policy
Ofgem
9 Millbank
London SW1P 3GE

Date

14th December 2012

Dear James

Competition in Connections - Consultation on WPD's Competition Notices

Ofgem is currently seeking views on the development of competition in connections in WPD's operating areas, following the submission by WPD of "Competition Notices" on 26 October 2012.

Please find enclosed our views on our experience of operating in WPD's area.

Yours sincerely,

Giles Frampton
Operation Director
Solar Power Generation Limited

SPGL's view on working with Western Power

To whom it may concern,

I have been Operations Director since joining SPGL at its inception, following a career in the property development industry which also included work on sites with DNOs.

SPGL has completed 20 or more projects within WPD's territory and we have roughly another 40 in various states of development from initial ENA application to final project delivery. We work both directly with WPD and using 3rd party ICPs. All of our projects are solar PV projects ranging from 50kW to 10MW under either FIT or RO, and are driven by very tight timelines. We also work with SSEPD and UKPN and so I believe I have a good perspective from which to comment on WPD's performance as a service provider.

I would start by saying that WPD clearly has a very strong internal emphasis on safety, availability of supply and adherence to competition law. This is reflected through application, project development and project delivery.

Having invested in developing our own electrical engineering resource we find the process of application to be straightforward. The 90 day period for response is long relative to the timelines which an unstable support mechanism has placed on us, but we find WPD to be more engaged than other DNOs in helping us to screen applications so that we only develop feasible projects. WPD's design team are clearly placed under enormous load by fluctuating levels of application, many of which are likely to be speculative. Our business has been affected by this and we have suggested to Ofgem that developers of PV projects should be required to place a deposit in order to discourage speculative exploitation of DNOs' license obligation. If this allowed more resource for well-considered applications, we would hope it would in turn reduce turn-around times.

We find that project development, during which our ICPs or WPD themselves confirm specification, equipment, design and finally delivery timing, is again a relatively long and uncertain process. We have had variable experiences with ICPs, some of whom are more effective at managing customers and their own DNO relationship than others.

We do find that WPD are open to engagement and we have worked with them to minimise the impact of equipment availability on our own business. We work with DNOs and with other suppliers in much the same way – we seek senior engagement to drive mutual understanding and innovation. We have been most successful in establishing this with WPD among the DNOs.

When it comes to site delivery, we prefer to work directly with WPD's delivery teams than with ICPs because of their knowledge and their pro-active attitude. We consistently find that all DNO field teams' interest is in delivering completed projects, and that approached in the right way they will be very supportive. As with all aspects of DNO engagement, we would welcome the option of paid-for, dedicated service in order to accelerate timelines. In the absence of this, we would highlight that in extremis WPD have gone well beyond their required service level in order to rescue us from a shambolic ICP's poor delivery.

I hope this is useful input to your review. I would be happy to comment further on specific issues if you are interested.

Yours sincerely

Giles Frampton
Operations Director
Solar Power Generation Limited

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Customer Feedback

Do you agree with the following statements?	Agree	Disagree	Any other comments
I am aware that I have a choice when seeking a connection and that WPD is transparent in promoting choice	Yes		
WPD provides sufficient information (web-site leaflets, offer letters, staff awareness) about Competition in Connections	Yes		
There is sufficient choice of alternative connection providers in my area		No	We find ICPs to be very variable in their competence and capability
It is straightforward to get a competitive offer from WPD	Yes		The process is straightforward, however it does not match well the timelines which drive our business
WPD pricing on connection letters is transparent	Yes		We find WPD's offers to be the most detailed, their pricing is competitive with the open market but their availability for works is constrained
WPD's Offer letter allows me to make a comparison with competitive offerings	Yes		As above
I have benefitted from the development of Competition	Yes		We believe WPD gauge themselves against ICPs' performance
I have seen service improvements resulting from the development of competition	Yes		

Which areas do you operate in – please tick

East Midlands	Yes
West Midlands	Yes
South Wales	Yes
South West England	Yes

LV	
HV	
EHV	
LV generation	Yes
HV/EHV generation	Yes
Unmetered Local Authority	
Unmetered PFI	

Name...Giles Frampton.....

Company...Solar Power Generation Limited....

Date.....