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Regulation and Policy
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National Grid Transmission: proposed Statement of Works trial

Dear James,

Thank you for the opportunity to comment on your consultation regarding the National Grid Transmission: proposed Statement of Works trial. This response is provided on behalf of RWE Innogy UK, a fully owned subsidiary of RWE Innogy GmbH.

We welcome the trial and encourage the development of future proposals to reduce the length of time to complete the Statement of Works (SOW) and connection process. Please find our responses to the questions listed in the consultation below:

Do you understand NGET's proposal?

Yes, we understand the proposal as described in the consultation.

What is your view on the usefulness of the proposal and its perceived benefits?

We welcome the proposal to improve the SOW process and are supportive of any possible reduction in time and cost of connecting to the network. In our experience the SOW process usually takes in excess of a year, leaving us with uncertainty regarding the full costs of connection and adding significant delay to the development of our projects. Reductions in the length of time are of special importance and we therefore suggest that the success of this trial should be assessed mainly through the level of reduction in SOW timescale. From a generator perspective the cost reduction appears minimal and should be less significant in evaluating success.

A common delay at the onset of the process that appears to have been overlooked in this proposal is the requirement for a token payment to be made by the generator to the DNO who then passes it on to NGET. The associated invoicing process leads to unnecessary delays to commencing project progression. We would recommend removing this step to achieve a quick win in increasing the efficiency of the SOW process.

Do you have any concerns with this proposals?

Whilst the trial will look to resolve cases where the DNO knows the impact of a generator on the transmission network, it offers no improvement in other cases. NGET's document "Small Embedded Generation and National Grid guidance note" states that if the DNO believes the generator *may* impact upon the transmission network it should apply to

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NGET for a SOW as soon as reasonably practicable. In our experience this rarely happens at an early stage of the application process. Often the DNOs will not make this application until the DG has signed the connection offer (despite our requests to do it sooner), which could be some 6 months after the original application was made. Ultimately we would like to see a shorter, more efficient partnership between the DNO and NGET to assess the impact of generators to ensure the application process can commence in a timely manner. We would welcome a separate project to address this aspect of the SOW process.

We would also be interested to know what the process will be to allow customer feedback on the trial?

Finally, as a point of clarification we are interested to know how Ofgem will measure the success of the trial?

Kind Regards,

Lewis Elder
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