

Consultation response on the Incentive Connections Engagement (trial): Part One

Consultation response to Northern Power Grid ICE Workplan

This submission is made on behalf of the distributed generation representatives on the DG/DNO Steering Group. This Group was established in the context of the annual DG Fora, with the aim of addressing issues faced by generation connecting to the distribution system.

1. Does the licensee have a comprehensive and robust strategy for engaging with DG connection stakeholders?

- Yes. Over and above the other DNOs, NPg hold customer forums twice a year, encourage ongoing (project specific) engagement via monthly design surgeries and an online request system, and facilitate a DG-community microsite. Engagement through project specific dialogue has seen improvement in the past year and we look forward to further improvements via the appointment of 'Key Account Managers'. It would be good to set out what parties will form their 'focus group' and what the selection criteria applied for this will be.
- Importantly, the work areas identified do correspond with what we see as important issues from a DG developer and owner perspective.

2. Does the licensee have a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of their DG connection stakeholders? If not, are the reasons provided are reasonable and well justified? What other activities should the DNOs do?

- Yes, NPg clearly sets out a work plan of key outputs to be delivered. The table on p6-7 of the paper provides a good overview of what customer feedback NPg is basing its plans on and what the headline actions are. It is easy to follow what their new commitments are because this work plan reflects on the starting point for actions i.e. what current practices are and what improvements have been introduced to date.
- One area that we feel NPg should publicly commit to in the coming year is to work with National Grid on improving the *Statement of Works* process for DG. We understand that NPg have been involved in some discussions with National Grid but it would be helpful to make this more widely known and explain to stakeholders the aims of this process. Given the volume of applications on this DNO network, in terms of both numbers and capacity, interaction with the transmission system operator is key. Committing to notifying National Grid of a relevant connection application within 5 working days would be a recommended KPI.
- Developing a clear strategy on interactivity would also be welcome.

- We note that the original “DG asks” included non-technical resource – explicitly whether there was sufficient legal resource to meet contract queries in good time – we’d welcome a comment on how this is being kept under review.
- NPg engagement via the DG/DNO Steering Group is greatly appreciated and we hope that this arrangement will continue as a positive and productive working relationship between the DG and DNO communities.
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3. Does the licensee have relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?

- In comparison to other work plans NPg sets activities out in a greater level of detail which is helpful and will be useful when it comes to accounting for what they have achieved at the end of the review period.
- A number of the commitments relate to ‘investigating’ whether something should be pursued. Ofgem should seek formal reports of these investigations at their end of year assessment to ensure that they have been progressed.
- We hope that the outputs set out will apply to all DG customers including EHV. This is not explicitly clear in the plan and it would be a concern if the initiatives were too heavily weighted towards HV and LV customers.

4. Has the licensee’s proposed strategy, activities and outputs been informed and endorsed by a broad and inclusive range of DG connection stakeholders? If endorsement is not possible, has the licensee provided robust evidence that they have pursued reasonable endeavours to achieve this?

- Stakeholder input to what NPg should deliver appears to have been done. However, the customer endorsements provided on p20 are general ones relating NPG connection customer experience rather than the work plan per se. This raises queries as to what exactly stakeholders were asked to endorse. On a positive note we are pleased with the work plan and would offer endorsement if asked.