

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

Response to the ENWL 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?

We believe that ENW does have a comprehensive and robust strategy for engaging with DG connection stakeholders. We are particularly impressed in that ENW effectively lead on many of the 'composite' DNO workshops, events and seminars, as well as chairmanship of the DG/DNO Steering Group in the context of the DG Fora.

With regard to the specific ENW sponsored workshops and seminars we note that ENW are prepared to facilitate active discussion and devote the time with their senior engineers and managers to ensure that the engagement process is as productive as possible.

We note that ENW were concerned that some of the 'high level' workshops were not being attended as well as they could have been. Having attended a number of these events we would suggest that this could be because the DG community are now forgoing the 'high level' workshops and preferring to utilise the 'bespoke and customer facility events' in order to resolve site specific enquiries. Thus it could be that the high level events are actually now becoming less of a necessity / requirement - with developers and agents preferring to utilise the customer dedicated meetings to make site specific enquiries.

As an aside it is considered that ENW have promoted their workshops and seminars on their website and have made every effort to engage with their customer base.

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?

We are confident that the work plan, activities and timelines within the ICE is sufficiently robust as to ensure that the requirements of the DG community will be addressed.

'Time to deliver' on quotations has rarely been an issue within ENW and where there have been issues these have (to our knowledge) been addressed.

As with all of the DNO's we anticipate that ENW will cascade their work plans down to grass roots within their organisation such that matters of policy and procedure are embraced and at all levels.

The participation and input of ENW within the Technical Group has been welcome.

Whilst Feasibility Studies has been raised as an issue and noting that ENW are applying voluntary penalty payments we would suggest that the Quote Plus regime (as adopted by SP) is worthy of serious consideration.

3. Does the licensee have relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?

The discreet deliverables and associated timelines are set out very clearly and while this work-plan is short it captures the KPIs effectively. Easy to follow layout is also very helpful.

It is of note that the outputs of all the DNO's have tended to follow a similar pattern – the generic issues and concerns having been identified during previous DG Fora. We would suggest that ENW have taken due note and have acted on the concerns in order to formulate and direct their thinking in the production of their DG Business Plan.

It is also of note that ENW were forward thinking in resolving A&D Charging, fair and reasonable deposits network modelling and provision of network data etc which will probably assist in an early delivery and completion of their performance targets. It is accepted that this was a cultural change that was embraced early within ENW but is of significance that it appears that it remains an issue within other DNO's.

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?

We believe that the outputs within ENW have in general been endorsed by DG Connection stakeholders. We further believe that as time progresses there will be further lessons, concerns and best practice identified and that these will be adopted by ENW and all other DNO's.

GENERAL COMMENT

The main cause for concern and frustration must now relate to saturated networks and issues surrounding network reinforcement. It is acknowledged that these are industry wide concerns that are beyond the remit of ENW or any of the other DNO's to resolve.