



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

Consultation Response TO SPEN 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. As discussed under question 4, we have been very pleased with the way SPEN has engaged in the past year. We are glad to see that this approach is proposed to continue. Their approach to engagement is robust.

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 supportive of the plan, and can see that it reflects the issues we have discussed with SPEN in the past year.

We welcome SPEN's plans under customer service to increase the use of account managers and allow more flexibility. We agree with their comment that account managers have improved the connection experience – in general the feedback has been that service has been improving and these plans continue the good direction of travel. However, 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.

It is worth noting that while there is a lot of good information on SPEN's website, which is generally well written, but it isn't always easy to find. There could be a benefit from making it easier for customers to find relevant information.

We welcome the plan to work to simplify the application process and link to the ENA database. We have strongly welcomed the introduction of Quote+ and the ideas to promote it further are welcome.

We are pleased by SPEN's openness to technical innovation and to learning and collaborating with other DNOs. We would also welcome more specific new roll out of technical innovation (the "next ARC") although we do recognise that this is an iterative process.

We particularly welcome the review of the payment plan policy, and look forward to engaging in that process. We also welcome more detailed breakdowns of costs.

The "Barriers to Connection" process would benefit from an action regarding milestones for terminating or re-contracting with stalled or heavily-delayed projects which are sterilising grid capacity.

We are very pleased to see a commitment to continuing to work on the distribution-transmission interface, and particularly to improve the Statement of Works process. This has been a significant issue for customers, and we welcome the level of emphasis SPEN has placed on it. However, this "Distribution/ Transmission Interface" section really should also include an action regarding the cumulative transmission impact of <1MW DG. These generators are not presently served by National Grid's Statement of Works process; we know SP has been in discussions with NG and also SSE on how to manage this but we would welcome communication of these plans with stakeholders, and this workplan seems a good place to highlight this work.

For future work, we would like to see a contracted capacity register to provide an indication of the trends and better level of information. We understand that SPEN may be consulting on this later in the year.

SPEN 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.

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

We are very pleased that SPEN are putting focus on policy areas for improvement, such as transmission and communities.

Where relevant, we would like to see some more numerical targets. For example, there are good plans for extending the number of customers with account managers, and a specific target could be set for the proportion of customers with account managers or for the number of account managers employed.

Similarly, while we welcome the KPIs to learn lessons and agree policy on technical issues, it might be good to have targets for specific roll out (while recognising that it may be more appropriate in future years).

The plans talk about initiatives and the KPIs are to assess whether each initiative has been implemented. Whilst these are welcome they do not seem to look at overall connections output KPIs such as cost, time, satisfaction.

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 endeavors to achieve this?

We are very pleased with the way SPEN has engaged with stakeholders in the past year, which is reflected in the close correspondence between the plan and our areas of concern. Their engagement through groups like the national DG-DNO working group and Scottish Renewables DG Working Group has been collaborative and responsive – and has led to them proposing very innovative and industry leading approaches such as Quote+ and detailed heat maps. They have also engaged with smaller developers, like households, that are not directly represented at such fora. We have also had positive feedback about their attendance at various conferences and other events.

5. Any other feedback.

The workplan is very well and clearly laid out, and we like the structure and headline areas, which match our priority areas. The information about what work was completed

last year in the “You said We did” format gave a good context to the plans for this year. The statement of intent under each subject area provided a good indication of the direction of travel going forward.

We’d recommend using the front page to clearly flag up the existence of a glossary – otherwise non-experienced readers may give up too soon! We would suggest aiming for slightly less use of acronyms or jargon (even with a glossary) to aid readability in future years.

The “Technical” section includes “..the only DNO who currently utilise voltage control...”, but we understand that both SHEPD and SPEN oblige voltage control functionality from the majority of their EHV-connecting DG? We would welcome clarity here.

The level of ambition seems to make improvements to the customer experience. There is less activity aimed at transforming the process to get thousands more DG customers connected e.g. by making the process much simpler and releasing more capacity than would otherwise be the case.

The most significant problems facing Scottish distributed generation are the long timescales and the high cost of connection. These are recognised to be outside the direct control of the DNOs, they cannot be fully addressed by an annual workplan like this one, and in many cases the solutions are not clear cut. We look forward to continuing to engage with SPEN more broadly on finding longer term solutions.