



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

Consultation Response to SSEPD 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 SSEPD 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 initiatives plan, and can see that it clearly reflects some of the key issues we have discussed with SSEPD in the past year. However, compared to other DNO plans this one appears to have omitted a significant number of key DG issues raised at previous DG Fora and related stakeholder events. Furthermore, we know that many of these issues are areas where SSEPD is doing some useful work, we feel the submission would be improved by sharing this work with stakeholders through this report. Issues on which we would welcome actions or at least further comment include: innovation roll-out to business as usual, non-firm/export-managed connections, review of legal resource for contract queries, access to technical staff during optioneering, termination/re-contracting of delayed/non-progressing projects, pass-through of transmission liabilities and involvement with improving National Grid's Statement of Works process.

In customer service we particularly welcome the additional customer managers (initiative 1) – we have seen big improvements in service from the ones already in place. The commitment to specific numbers recruited is excellent.

We are particularly pleased with their intention to make contracted capacity information and the amount of capacity available on the network available (initiative 3 and 5) as well as better information on transmission constraints (initiative 4). SSEPD has been slower than others in introducing heat maps, but their proposed approach with up-to date capacity signals has potential to be one of the leading solutions.

The improved website with online application, payment and tracking process (initiative 6, 7 and 8) together with process maps and “plain guides” (initiative 2) will be very welcome to support people who are finding their way through the connection process for the first time. We welcome the fact that this will link to the technology database developed by ENA.

Once the first set for smaller domestic connection customers is complete, we would recommend extending this initiative to larger projects to help support community groups and similar new connecting customers who may not understand the process.

We are strongly supportive of SSEPD adopting a streamlined optioneering process (similar to Quote+). We feel that this is a good example of the advantages of workgroups in sharing best practice.

We were pleased that SSE encouraged the formation of consortia through meetings. To support this process, it may be an advantage to complete the circle by encouraging generators to become proactive too by making sure the possibility is made clear to people when they receive a quote (for example, “what to do if this quoted price is too high?” and perhaps some tips on the forms of collaboration that may be possible).

The interface between distribution and transmission is a major concern in the SSEPD area. We are pleased that SSE are reviewing the way they communicate transmission constraints to customers (initiative 4), to ensure clarity throughout the process. Clarity on this subject is particularly important in light of Cancellation Charge payments that are (and will be) faced by embedded projects upon modification/termination. However, we’d like to see more attention given to this area of the plan, with further commitments including continuing to work with others to improve the transmission-distribution interface, and particularly Statement of Works process, recognising the good work already done in this area.

We welcome the efforts that SSEPD has made to protect customers from passing through all liabilities under CMP192. We would have liked to see the commitment to this in the work plan, because it has been an important area where they have provided exceptional customer service.

We welcome the efforts and KPIs to promote competition in connections, under initiatives 11 and 12

SSEPD 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 welcome the specific number targets for Account Managers in particular, and for updates to online information. This gives specific and measurable targets for progress.

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 endeavours to achieve this?

Yes. We are very pleased with the way SSEPD has engaged with stakeholders in the past year, which is reflected in the close correspondence between the plan and our areas of concern. Our feedback has been included from earlier drafts and SSE presented their plan to our workgroup.

In general, their engagement through groups like the national DG-DNO working group and Scottish Renewables DG Working Group, as well as their own Customer Voice Group has been collaborative and responsive. We have been particularly impressed by their responses on payment schedules, 90 day validity timescales and managing liability pass-through. 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. We are pleased to see that the role for individual meetings has also been recognised.

5. Any other feedback.

The workplan is well and clearly laid out, and seems designed to be accessible to non-expert readers. It gives a clear reason for each of the initiatives.

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 SSEPD more broadly on finding longer term solutions.