WINDFLOW

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

COMMENT ON: SP ENERGY NETWORKS

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Note, as Windflow has only made a small number of connection applications to date in this DNO area, and not accepted or built any connections, the feedback is purely on the basis of the document and is not on the basis of detailed knowledge of SPEN's actual working practices.

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

   The proposed initiates appear to be well founded in consultation to date with a large number of people and different types of stakeholders e.g. ICPs. The approach to assess the impact of these initiatives and priorities for future work plans is not clear.

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?

   There is a comprehensive plan of initiatives, which are all individually welcome. A concern is that there is a lot of devil in the detail in those which result in change this year. There are several initiatives which commit to consultation but no action in the next 12 months.

   The level of ambition is interesting. Most of the initiatives are looking to improve customer interactions with complex processes which have evolved from the legacy ways of working for larger DG projects. There are also a few which are looking to improve what the customer gets: reduced cost e.g. standard enclosures, and higher levels of DG permitted on the network e.g. voltage control. The overall plan is still some way from a transformative plan of how to achieve many more DG connections faster and cheaper.

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

   The KPIs are all related to the individual initiatives and as such can be considered "input measures" to the connections process.

   However, there are no "output measures" of the overall success of the work plan, such as lead time to offer, lead time to connect, cost per connection, total capacity connected or satisfaction with the process. It is recommended that these are added and measured through surveying all would-be connectees who are actively engaged in the process each year.

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?

   The resulting plan appears to have been endorsed by 19 stakeholders, although the questions asked are ones which are difficult to say no to!

5. Any other feedback.

   Initiative reference numbers:

   1. Customer Service: Account managers, where requested, should be across portfolios.

2. Application Process: I look forward to experiencing our first “quote plus” in action, as there are important interactions between what you want and the cost, capacity and lead time of what is available. In terms of the “dual offer”, this should be for all voltages and not just 11 kV.

3. Information: The existing heat maps are very useful, keep up the good work by extending them to 33 kV and minimum quarterly updates. Also consider how future network reinforcement, or capacity released through smart controls, can be shown. Guidance leaflets to include the application, build, and CIC processes.

4. Communications: To implement a CRM system may be useful, but the benefit to customers is not clear from the description of the initiative or the KPI. A simple commitment for a non-automated response to all e-mails and phone calls by the end of the following day would be useful.

5. Technical: Voltage control, unfortunately there is no commitment to any trial or rollout. The commitment to cost reduction through use of standard enclosures is welcome, even better if this can be agreed across DNOs, with further cost reducing standard building blocks to follow.

6. Enablers to Connection: The devil is in the detail of these, it is not clear what will be delivered.

7. Choice: Dual offers are welcome, they are already standard in other DNO areas. Even better if there can be an offer which includes everything e.g. does not leave out trenching and enclosures. Also, useful if the choice of which offer to accept can be left open until shortly before the delivery project has to commence.

8. Distribution to Transmission Interface: This is a complicated area from which the DNO should shield smaller DG customers as far as possible, and seek transformative solutions in its interactions with the Transmission Operator

9. Communities: Whilst these initiatives are welcome, the focus of the DNO’s work should be on delivering a connections service which is fit for all, and not need to give special treatment to Communities.