



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

COMMENT ON: SCOTTISH AND SOUTHERN ENERGY – POWER DISTRIBUTION

FROM: ANDY STROWBRIDGE, GENERAL MANAGER, WINDFLOW UK

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

The proposed initiatives appear to be well founded in consultation to date e.g. through previous DG forums and the DG-ENA steering group. Many activities are described in “Our Plan Of Engagement”, however, it is not clear how customer priorities will be translated into DNO work priorities.

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 of each, so for example on the production of a heat map, this does not define the level of detail, the frequency of update, or whether it is a current snapshot versus a picture at several future points in time.

The larger concern is the overall level of ambition. It appears that the DNO is looking to improve complex processes which have evolved from the legacy ways of working which supported larger DG projects. There is nothing to suggest they are seeking to transform these for a higher volume of smaller DG projects, which the government policy seeks to encourage.

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. It would be better if these input measures were related to the total volume of work e.g. “rolled out to 50 or 100% of ...”, rather than “500 automated quote expiry reminders sent out”.

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. This is important as the nature of the distributed generation market is not static and will change from year to year so the relevance of individual initiatives may change, whereas the overall output KPIs should remain relevant.

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 proposed initiatives appear to be well founded and address many of the current issues I am aware of.

5. Any other feedback.

Initiative reference numbers:

1. Account Managers: Even better if you can allocate a single Account Manager to customers with a portfolio of projects. This is what virtually every other industry does.



It would be useful to be able to provide periodic customer satisfaction feedback on Account Managers.

2. Process Maps: I can understand that these are targeted initially at a high number of customers with smaller connections. Process definition, including steps, options, document names and expected lead times, would also be useful for customers with mid-size connections.
3. Heat Maps: there is a lot of devil in the detail which is not described in the initiative. For example, it does not define the level of detail, the frequency of update, or whether it is a current snapshot versus a picture at several future points in time.
4. Better Information on Transmission Constraints: This is important as much of the DNO's area is already, or will soon be affected by transmission constraints. There is no indication that this issue will be addressed, e.g. by offering a service to connect now with constraints and be upgraded as soon as cost-effective reinforcement can be provided.
5. A Quarterly Report on Generation: No comment.
6. Online Connection application: Am not sure why this is limited to sub 50 kW connections as the connection application information is fairly straightforward for larger connections.
7. Online Payment: Am unclear what the difference is between BACS and online payments.
8. Online Project Tracking: It will be useful to see the summary information on status in one place. It will be good to have both the DNO key staff's contact details and the customer's contact details and contact preferences visible, to ensure that these are commonly understood.
9. Automatic Quotation Expiry Reminder: This process could be extended beyond the quote acceptance to any other time critical steps.
10. A Streamlined Optioneering Process: Am very much looking forward to seeing this in action, as there are important interactions between what you want and the cost, capacity and lead time of what is available. The current fixed process of "we can only provide the lowest cost quote for the single thing you asked for" can be very frustrating in real life.
11. Register of Alternative Providers: It will be useful to be able to filter this according to the voltage and capacity of connection.
12. Assistance with Alternative Options Identification: it is not clear what this initiative covers. It will be most useful if it provides a plain guide to the whole process from benchmarking value for money through appointing an ICP to adoption of the completed works. Effectively benchmarking value for money requires transparency regarding the design of the contestable works and any ICP charges up front. It would also be useful to have the choice of all works or non-contestable open until a few months before the work would need to start, for projects which will not start immediately.