

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

Consultation response to WPD 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?
 - WPD's customer engagement pyramid sets out precisely how customers with different levels of knowledge and interest should be funneled through the system. The timeline of engagement activities further allows customers to determine where and when they might best engage.
 - However, the strategy seems to be heavily weighted towards WPD's Connections Steering Group, with apparently limited feedback from others in the DG community. We note other DNOs seem to have been more proactive with garnering detailed feedback from more customers, for example through customer surveys.
 - The new website for customer connections is very helpful.
 - What is not clear is whether there are sufficient DG-specific events, where issues can be discussed in open forum in detail. Connection surgeries should prove very helpful but possibly do not discuss overall strategy. Stakeholder workshops and the CCSG (with two representatives from the DG community) are probably the right format but it will not be possible to have an informed debate on the wider strategy for facilitating DG.
 - The distinction between DG developers and Community Energy Schemes is welcome. But there seems to be no obvious consideration of different scales of DG connectees. For example, what is the engagement with small turbine developers (sub-500kW) that are not part of a "community energy scheme" *per se*?
 - The above only emphasises the importance of the DG/DNO Steering Group and the national DG Fora in the autumn, but the limitation here is that there is limited opportunity to discuss any one DNO's strategy in depth.
 - WPD 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.

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?
 - The WPD plan sets out a range of initiatives with target dates. This is helpful. However, many actions are noticeably vague and unmeasurable. For example, "implement

improvements to connections legal process,” or “implement access to further network information for customers.” Both are welcome, but more specific outputs would be helpful.

- We welcome WPD’s focus on facilitating ICPs to obtain land rights and to undertake reinforcement works.
 - Since production of the workplan, we welcome WPD’s intention to develop a contracted customer register. This should be helpful for prospective DG developers in assessing the risks and likelihood associated with current and future grid availability. WPD’s proactive consulting on interactivity is very welcome.
 - We were disappointed not to find any actions regarding implementation of innovation initiatives, progressing non-firm or export-managed connection arrangements, or communicating these issues to customers.
 - 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.
3. Does the licensee have relevant outputs that it will deliver during the regulatory year (e.g. key performance indicators, targets, etc.)?
- Many Actions from the plan could be more specific and measurable, as set out above.
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?
- WPD’s plan has been endorsed by the Connection Customer Steering Group (CCSG). This Group is welcome, but we note above the inevitable limitations of a small group in attempting to represent the views and needs of a wide range of constituents when trying to deal with generation-specific issues.
5. Any other feedback.
- The level of ambition seems to be to make incremental rather than fundamental change 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 problem facing distributed generation in the South-West is the high cost of connection and the need for reinforcement. These are recognised to be outside the direct control of the DNO, and 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 WPD more broadly on finding longer term solutions.
 - The key performance indicators appear to be tied to either the very specific Connections Steering Group or otherwise to the very broad customer satisfaction surveys. Could there be any KPIs relating to specific service improvement actions?

- We note the forthcoming requirement to partner this submission with a 'looking back report'. Nonetheless, we welcome SPEN and NPg's efforts to summarise work done in the current ICE submission, as it helps explain the actions they have chosen to follow; we would invite WPD to consider whether similar reflections may help to better justify its own plan.