

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

### **Consultation response to UKPN 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?**

- The customer engagement workshops and the DG specific customer service surveys clearly reveal that UKPN has a strategy for engaging with DG stakeholders.
- There's no obvious consideration given to different scales of DG connectees. Are there efforts to ensure that all customer categories are being thought of? For example, it may have been difficult for small turbine developers (sub-500kW) to attend the customer experience workshops, therefore will their feedback be missed?
- It would be helpful to get a better description of what the customer experience workshops cover, who gets invited and how many attend. Nevertheless, they sound like they have been very successful events and provide useful feedback to UKPN.
- UKPN 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.
- It may be helpful for UKPN to assign dedicated account managers to repeat, regular developers with larger portfolios. Giving developers a standard point of contact with an account manager who has an understanding of the developers' entire portfolio.

#### **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?**

- Yes, but this is all captured on UKPN's "*Distributed Generation Service Improvement Plan*"<sup>1</sup> which appears to be omitted from UKPN's ICE submission as reported on the Ofgem website. UKPN have advised us that this service plan formed part of the UKPN submission, however this was not uploaded to the Ofgem website, nor was the electronic link circulated to key DG representatives until a day before the consultation deadline. We have commented with the service plan in mind.

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<sup>1</sup> Available from :<http://www.ukpowernetworks.co.uk/internet/en/connections/electricity-generation/national-terms-of-connection/> (DG plan 2014)

However, it should be noted that other respondents may not have seen this service improvement plan.

- The Service Improvement Plan (not linked from the Ofgem website) shows a comprehensive table of outputs and deadlines. This is a very welcome set of initiatives which shows a broad and appropriately detailed response to the issues and requirements of DG customers as raised through last year's DG Fora and UKPN's on customer workshops. There are many individually welcome initiatives; we particularly highlight the FPP roll-out and Innovation sections (noting sadly that the 'non-firm connections' item is un-dated), as well as the proposed customer engagement charter.
- A better indication of the timetabled Business-as-usual rollout for the online application, payment and tracking process would be very helpful.
- The offer of feasibility studies is not considered within the workplan (quote plus). Although UKPN run DG surgeries, these are not entirely suitable for small turbine developers, therefore a feasibility study that fits into the interactivity process would be welcomed.
- Many of the actions in the service plan are difficult to measure (for example "Enhance existing roles..."); we would welcome more specific targets in future plans.

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

- Although the service plan shows clear delivery dates, it does not provide a breakdown of detail. Because there were two separate documents submitted as part of the workplan, there appears to be some disjoint between the two. This makes it difficult to follow.
- Heat maps are described as being updated "regularly". We would suggest that a monthly update be a minimum in this, and that UKPN consider following other DNOs in developing near real-time heat maps for customers (e.g. SSE's proposal for an 'app' updated daily).

**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 customer experience workshops have been running for some time, and it is understood that positive feedback has been received from all of the events. As a result, it would seem that this strategy has received stakeholder endorsement. However, efforts need to be made to ensure that there is not too much weighting given to these events, and that other forums of feedback are pursued with similar efforts (such as the DG Specific Customer Service survey).
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## 5. Any other feedback.

- We feel that there is some detail lacking on the proposed schemes. More information would be gratefully received in order to get a clearer picture; for example with *ask the expert* or *the customer access portal* initiatives.
- Why were those particular key performance indicators chosen and do they all have equal weighting? There seems heavy weighting on the customer experience workshop feedback, though there may be many customers that do not attend these.
- We are happy to hear about the development of the DG Mapping Tool, which builds upon the current resources available from UKPN (such as heatmaps).
- 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 note that UKPN submission includes a note on '*you said, we did...*' on page 8, but we would invite WPD to consider whether additional reflections may help to better justify its plan.