Consultation response on the 2013-14 Incentive Connections Engagement submission

Part two: Looking Back

28 August 2014

I would like to pose my own question to Ofgem – if the original workplan was poor or limited inscope, how is this reflected in the review of the looking back report? e.g. if a DNO had very few actions, but completed them all, would that DNO's performance be rated higher than a more ambitious DNO who achieved a lower completion percentage of more actions?

What follows is an incomplete response, but includes some details which may prove useful

- Has the DNO implemented their strategy for engaging with connection stakeholders, in line with their DG Workplan? If not, are the reasons provided are reasonable and well justified?

NPg: Very good: stakeholder events good, online community launched, positive engagement with DG-DNO Steering Group.

SPEN: Very positive engagement with DG-DNO Steering Group, and with the Scottish Renewables DG group.

UKPN: Has demonstrated a step-change improvement in customer engagement – noting the excellent customer experience workshop programme, useful DG surgeries, and additional specific issue consultations (e.g. recent "management of capacity" consultation on UKPN's website). Hope the customer experience workshops will continue.

WPD: A very significant improvement in engagement, WPD has delivered well on its promises of surgeries, stakeholder workshops, engagement with the national steering group and the added initiative of the Customer Connections Steering Group (CCSG). WPD's 'pyramid' plan for engagement seems appropriate. As per our response to the looking forward report (joint response with ReUK etc.), we have some reservations about the weight given to the CCSG, and the breakdown of representation (LV/HV/EHV) in the 400 surveyed DG customers.

SSE: Very positive engagement with DG-DNO Steering Group, and with the Scottish Renewables DG group.

- Has the DNO completed the DG workplan of activities in the agreed timescales? If not, are the reasons provided are reasonable and well justified?

- Has the DNO delivered the outputs stated in its DG workplan? If not, are the reasons provided reasonable and well justified?

-

I find it hard to separate out the timescales from the outputs – certainly many of the initiatives either did not have explicit timescales, or more likely evolved with time into new initiatives, or are phrased differently from DNO to DNO in such a way that separating the action from the timescale could give unfair comment. I have collectively fed back on the looking-back reports below:

NPg. Very good performance overall. Regarding *quote cost breakdown,* the reporting is different from the original plan – it is not clear what is happening or when it will be implemented. Minor blot on otherwise respectable copybook. Noted that NPg performed extra actions not detailed on the original plan (online app, heat maps). It is worth noting that NPg's was one of the most comprehensive and ambitious workplans.

For all the DNOs, but most obvious when comparing NPg's report to its original plan - There is a sense of not fully reporting aspirations in the original plan, for the understandable fear of "non delivery"; while the looking-back report shows there were a number of welcome but initially untracked actions which the DNO did in fact deliver. It may be useful for Ofgem to provide more clarity on how the looking forward plans will be judged, so as to encourage (or discourage!) each DNO from including aspirational items which it is less certain of delivering.

SPEN: Overall seems like a very good performance – notably Quote+ and, progress on non-firm connections, AVR adoption and leading all DNOs in the development and publication of heat maps. The great majority of actions have been progressed in good time. It is worth noting that SPEN's was one of the most comprehensive and ambitious workplans, and that SPEN was first to deliver many of the objectives held in common with other DNOs. Some detailed review of the report itself:

(3.1.1) hyperlink broken. (4.1.2) *Dynamic Thermal Ratings* (DTR) action only says "continuation" which is quite hard to measure – when is target BAU implementation? I notice DTR is missing from the 2014 looking forward plan. (4.4.3) Are these findings not communicated to customers at SPEN stakeholder engagement events? (5.1.2) automated cost breakdown is interesting, delivery date explained OK. (7.2.1) hyperlink broken – I can't find this page at all? there's an "opportunities to engage" page although this omits the Glasgow DG Forum event! (7.2.4) I though this was complete? isn't this the SPEN 'RadaR' thing? (7.3.6) please reference CUSC Mod 223.

UKPN: I believe from *first-hand* experience that most UKPN actions have been progressed well (either completed or subject to very exlicable delays); however the looking-back report does not make this clear. I appreciate UKPN's efforts to refresh and simplify the presentation, which may aid clarity going forwards, however the action points in this looking-back report do not clearly map to the UKPN workplan from early 2014, which makes performance from the report difficult to comment on. For example, consider the subsection titled "Customer Service" – this corresponds to eight bulleted actions (starting "simplify offer documentation"…) in the looking back report, but is covered by 11 (different?) specific numbered actions in the workplan (starting "monitor customer satisfaction"). It wasn't obvious to me how to map the original actions to the report. The work done and outcomes are very welcome, however the reporting is generally vague and wording provides very little detail or quantification against each action (I would also welcome some references or hyperlinks which could lead the reader to find out more), without such detail it is hard to pass comment on the reported outputs. One example (of many which could have been chosen): "deliver DG training" = what kind of training? what does this enable staff to do? was it all internal and bespoke or something certified by an external body? was it awareness of technology impact or contractual training or on recognising commercial issues? UKPN refers to its "Business Transformation Process" but there are no references and it's not clear what this means for DG, only that it "will deliver […] improvements". "Review operating model" – I'm not sure what this refers to, is there any more detail available?

There are a number of items which were detailed in the original workplan but did not appear in the looking back report: sharing best practice with other DNOs (with examples?) a "customer portal", "a process for managing capacity released…" (I know UKPN has consulted on this, but surprised it does not appear on the report?!), "changes to interactivity process…" (again, UKPN has worked on this but doesn't appear in the looking back report), "letters of authority", etc. (there are several more examples). I'm very keen to see UKPN catch-up with best practice in offering CiC and all-works options within a cingle connection offer as standard, something I understand UKPN describes as 'convertible quotes', noted as delayed in the report but good to see it continue as an action point. Finally, could UKPN consider a glossary? I worked out "BmoCs", but not "SLAs"…

UKPN's heat maps are updated with very useful frequency, and the updates are communicated very quickly to DG stakeholders (UKPN maintains an email list of stakeholders).

WPD: WPD's original plan of initiatives appears less comprehensive and less ambitious than e.g. the NPg or SPEN workplans. Although WPD is already ahead on some concrete issues such as providing useful cost breakdowns and already delivers non-firm connections, there is a sense that WPD reviewed at the time seemed content with its offerings; there are few stand-out initiatives in original WPD plan beyond enhanced engagement, while for example NPg prototyped an automated design tool and SPEN instigated the Quote Plus application option.

It is pleasing to see that the WPD looking-back report covers explicitly the same actions which were detailed in its September 2013 workplan issue, thereby facilitating comment. Many of the entries are identical to the September 2013 workplan issue, and it would have been beneficial to see some commentary on what WPD had learnt from the completed actions and how this might aid future service improvements. The original workplan item on "non-technical support staff" explicitly questioned resourcing for land rights and contract details (legal) – it would be useful to know if WPD had reviewed its capability in this regard, and if WPD would commit to repeat the review with a specified frequency. On "Reinforcement", being tasked with clarifying the methodology, has WPD completed the action simply by attending a meeting? is there any follow-up or published policy update? Regarding "innovation roll-out", WPD is right to reference the business plan, but the report would benefit from a line or two about specific innovations which have-been or will-be rolled out (for example, consider SSE's presentation on the same issue, where lessons learnt from Orkney have been applied to other new active network management area). Regarding "online applications" – this is a welcome development, although a work-in-progress; RES has separately provided feedback to WPD on the outstanding issues and we look forward to the revised product.

WPD has completed heat maps, but these are caveated on its own website as having "…not accounted for any other generation connections planned for, or existing, on the network"; to not account for *planned* generation is a signficant disappointment, to not account for *existing* generation renders these tools completely useless – is this possibly a typing error? Fixing this issue would be a big step forward.

SSE: Slightly differing from other DNOs, I have noted previously that SPEN's *looking forward* plan is less comprehensive but with far more detail on the remaining initiatives. The *looking back* report is presented with a style in keeping with the looking forward report, and plenty of detail on each initiative is given, which is welcome. The looking back report covers almost all of the initiatives from the original (October 2013 issue) workplan - I'm sure there is a good reason to cut out mention of "checklist of what customers expect" and "Application Fee", but It would be good to see this explained somewhere in the report. SSE has demonstrated good, timely progress on all actions. The commitment (i4) to keep connection offer terms under review is very welcome, and I look forward to seeing summary of this review in future ICE submissions. On i7 "contestable works.." SSE has lead the way in offering CiC and all-works options in a single connection offer as standard. Regarding i15 "address barriers" – it is pleasing to see specific mention of an initiative which is developed and carried into the looking forward plan. Regarding the presentation – a minor quibble that the speech bubbles seem disproportionately large, distracting from the initiative itself, but overall the report is clear and easy to follow.

See comment above – collectively commentary on the looking back reports is given above.

- Has the DNO's DG Workplan taken into account ongoing feedback from a broad and inclusive range of connection stakeholders? If not, are the reasons provided reasonable and well justified?

NPg: Engagement plans were very broad, workplan updates seem to reflect the engagement.

SPEN: Very broad surveying, gave SPEN excellent breadth of representation to feed into its plan.

UKPN: Engagement activities were varied, which has enabled a breadth of feedback. Workplan heavily revised over the year; this seems likely to have been driven by customer feedback.

WPD: Appears to have strong focus on the CCSG and a survey of 400 selected DG – it is not clear what the breakdown of the surveyed customers were so it is hard to comment on whether this is representative. Taking into account feedback would suggest new or amended actions on the workplan – I can see the *CCSG* and *online applications* have been added, which could reflect customer feedback, it's not clear.

SSE: Broad surveying, seems representative.