



ENW consultation response on the 2013-14 Incentive Connections Engagement submission

Part two: Looking Back

This submission is made on behalf of the distributed generation representatives of 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.

We acknowledge that this is a trial process and that the workplans were not created with “ICE submissions” in mind and we hope our comments are understood in this context as being for the improvement of future workplans. We sincerely hope that Ofgem can provide more guidance in future as to what criteria and weighting will be given to the looking forward and looking backward reports to help DNOs and stakeholders alike. For example, we would welcome clarity on what credit would be awarded to a more ambitious but less delivered plan. We also ask that Ofgem reconsider the timings of these consultations – it seems logical that the “looking back” process informs the looking forward report, and we also appreciated looking forward reports which contained a “what we have done” section. We also consider that a conjoined process might reduce overall workload for respondents.

All DNOs should provide Ofgem with template evidence in the form of participant lists and regular post-event/ initiative feedback to make it clearer how stakeholder engagement is taking place, and how many are being successfully reached. Hyperlinks should be provided to original workplans to enable stakeholders to easily review the original actions and timescales.

1. 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?

We are pleased to confirm that we consider that ENW have engaged with stakeholders via a number of different routes, notably customer ‘DG specific’ workshops, DG surgeries, email bulletins and ‘on-demand’ face to face meetings. There has been significant effort on the part of the ENA DG Team in order to fulfil their commitments to the DG Steering Group and DG stakeholders in general.

We now have no reason to believe that the steps taken to facilitate DG connections will not become ‘business as usual’.

We note that comments were made that, more recently, some of the ENW workshops were not as well attended as the earlier meetings. We have suggested that we would anticipate that as the DG community become more familiar with the bespoke facilities made available by ENW that there would be a transition from attending the generic workshops and moving towards the surgeries and face to face meetings.

We have suggested that ENW may wish to review the webinar facilities currently offered by UKPN.

Extending the drop-in sessions to an open door policy is a very helpful method of allowing customers to hold face-to-face meetings at any time of convenience. Praise should be given for this open door policy.

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

We believe that ENW has fulfilled all of the commitments made within their Business Plan, and within the nominated timeframes.

As with all of the DNO's there are minor concerns relating to inconsistency of approach and application of technical issues but we believe that there is the will to recognize these issues and address them on an ongoing basis.

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

We believe that ENW has fulfilled all of the commitments made within their Business Plan.

The revision of validity periods for the acceptance of quotations is welcome. Likewise, the convertible quotation with contestable and non-contestable elements is to be applauded.

The traffic light flexible application system sounds like a very good way of allowing smaller applicants to gain further scope of what's possible. It will make things easier for applicants and will hopefully reduce the potential workload of ENW.

The specific investment plans (as part of the overall Business Plan Commitment) were also welcome. Outputs relating to the uprating of circuits limited by fault levels constraints and also inclusion /consideration of Unit Protection Schemes at 33KV will also assist in the connections process for larger DG projects whilst still improving the security of the networks.

4. 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?

We believe that ENW has established a comprehensive and robust mechanism to engage with stakeholders.

In particular it should be noted that representatives from ENW Chair the DG Steering Group and Charging Methodologies Forum and Technical Work-Group (which is highly focused on DG issues at this current time). The additional time commitment for these tasks needs to be identified and recognized.

Through the various committees and stakeholder groups we have been made aware of few complaints or concerns relating to DG connection activities.

It would have been good if ENW had tried to give an explanation as to why customer satisfaction dropped on September and January. It is suggested that ENW should try to find a link in the trend and discover the cause of this decline.