



## NPg 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?**

Yes – it is positive to see that NPg has actively participated in the generic customer engagement activities common across the DNOs: the DG-DNO Steering group, the work aiming to improve customer service via design and assessment fees, ENA type testing, and annual DG Fora. More notable are the NPg specific efforts to engage with customers: the NPg specific DG forum events are excellent and very informative, taking a holistic view of DG impacts on the network and customer needs. The online community launch is great. Less experienced/HV-LV DG customers have useful engagement opportunities via the monthly design surgeries and ask the expert services. We would feedback that for complex connection schemes, one to one meetings and general expert availability are more important for EHV customers. Although it is good that NPg has completed a survey - it is unclear what the actions stemming from the NPg connections survey are. This should inform next actions for DG customer service improvement in a clear way.

The workplan appendix from NPg is a very useful breakdown of information, and one of the few DNO workplan responses that provides a breakdown between HV, EHV and LV customers.

**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?**

Very good performance overall. NPg has provided a clear log of their activities that are easy to follow- their own account suggests that the initiatives are by and large on target.

In some areas NPg is following trends set by other DNOs, and delivery has been late – quotation validity period extension and provision of full cost breakdown. It has however been recognized by NPg that these services need to be offered by them so it demonstrates learning from others. One particular disappointment we can see compared to some DNOs is that NPg lags behind with the standard issue of dual quotations of contestable and non-contestable works to HV and EHV generation connections customers. Efforts are being made to implement this and we await its introduction in September. Ideally the system should be such that the non-contestable only quote can be converted to the full works version at a later date within a specified timeframe. Another area of late delivery is that the EHV heat maps - while now available online, these were 2 months late from the suggested date mentioned at the DG forum in May.

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

Ultimately, an improvement has been observed in NPgNPg’s service to DG customers. Its performance in the past has been quite poor and it has come some way. There is a large volume of EHV and HV applications in the NPg area, so the challenges are increasing. We hope to see continued improvement.

It is positive to see that NPgNPg has actively participated in the initiatives common across the DNOs: the work aiming to improve customer service via design and assessment fees, ENA type testing database production and the launch of online applications. While these initiatives are important and should be recognized by Ofgem, for the purpose of this valuation, more notable are the NPg specific initiatives. The original workplan was quite detailed and so in the case of NPg it is easy to track how they are progressing.

It is noted that NPg performed extra actions not detailed on the original plan (online app, heat maps). The same goes for all DNOs, but most notably from NPg’s report - there is a sense of not fully reporting aspirations in the original plan, for the understandable fear of “non-delivery”. It may be useful for Ofgem to provide more clarity on how the looking forward plans will be judged, so as to encourage each DNO to include aspirational items which it is less certain of delivering.

**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?**

Overall, the engagement plans were very broad and the workplans reflect this engagement.

**Further comments:** Some specific feedback to raise that NPg should be actioning (but are not visibly doing so): NPg ‘Stability Studies’ cost £30K as an additional cost to the initial payment from signing an offer. Despite this upfront payment they are slow to be initiated. Can NPg start using the initial payment to conduct these ‘Stability Studies’ as soon as the Offer is signed?