

Open letter consultation on how the Distributed Network Operators have engaged with Distributed Generation customers in 2013-14

Dear Ofgem,

Please find attached the final submissions, on behalf of members of the DG/DNO Steering Group, in response to the DNO DG 'looking back' workplans as part of the ICE trial.

You will see that overall we welcome the plans, and we welcome the customer engagement that has taken place between the DNO's and the DG community.

We would also like to provide feedback on the overall ICE trial and the consultation process administered by Ofgem. It is acknowledged that this is a trial process and is therefore the first of its kind. Before becoming business as usual, it is recommended that Ofgem provides guidance to stakeholders at the start of the initiative to inform them of the ICE process and the workplan timetable and consultation procedures that will take place throughout the year. This will help stakeholders to have better foresight of the ICE procedure, and the process of the forward look and backward look reporting, and the weighting that each of the procedures carries within ICE. For instance, if a DG workplan was ambitious but is not fully delivered, how does this score as compared with a less ambitious workplan that is completely met?

It is also suggested that the timings of the consultation submissions could be combined. We had thought that 'looking back' might help to inform the 'looking forward' workplan, and certainly we found it helpful in some of the forward look workplans to have a "what we've done" section. While there would need to be some reconciliation of timings between end-of-year and beginning-of-year, it would seem sensible to have the two consultations running in conjunction. This would reduce the workload for respondents, add context and comprehensibility to the two consultations, and provide a more conjoined approach to the process.

We would welcome the opportunity to discuss this feedback in more detail.

Thank you very much for the flexibility you have allowed in timescales on this consultation.

Yours sincerely,

Distributed Generation representatives.

