

SPEN 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 consider that SPEN have engaged with stakeholders via a number of different routes, notably surveys, national DG-DNO working group, Scottish Renewables Working Group, attending numerous energy conferences, DG surgeries and face to face meetings. There has been significant effort to produce innovative responses to feedback – notably heat maps and Quote Plus. SPEN engagement via the DG-DNO Steering Group and Scottish Renewables DG group has been very positive.

It would be useful if SPEN provided statistics on the breakdown of stakeholders. For example, how many were LV or HV. This would ensure that they are receiving information from a balanced representative of stakeholders. If reliance is placed too heavily on customer workshops and surgeries, smaller DG may not have the opportunity to attend and therefore feedback on any issues. Surveys via email or phone should continue to be an important contribution to stakeholder engagement.

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?

Yes, SPEN has completed the activities set out in their time frame. Overall their approach has been good, notably Quote+ and heatmaps, progress on non-firm connections, AVR adoption.

Some detailed issues:

3.1.1) the hyperlink to heat maps is broken.

4.1.2) Dynamic Thermal Ratings (DTR) trial only gives the status as “continuation”, which is quite hard to measure. It would be good to know when they hope to have business as usual implementation. DTR is missing from the 2014 looking forward plan.

4.4.3) Can these findings be communicated to customers at SPEN stakeholder engagement events?

7.2.1) hyperlink to SPEN Customer Surgeries broken and we can't find this page. There is an “opportunities to engage” page, although this omits the Glasgow DG Forum event.

7.2.4) Is this the SPEN ‘Radar’ project? Might be worth clarifying this point, particularly since it has been moved forward into the next workplan.

7.3.6) Please reference CUSC Mod 223 for clarity.

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

Yes, SPEN has delivered the outputs specified.

In their report they have particularly highlighted their work on Heat Maps and Quote +. These have been innovative and industry leading processes. We have been pleased to see the level of collaboration SPEN has shown with other DNOs to share their learning from these activities. Some more detailed comments are given above.

It is worth noting that the most significant problems facing Scottish distributed generation are the long timescales and the high cost of connection. These are recognised to be outside the direct control of the DNOs and cannot be fully addressed by an annual workplan like this one, and in many cases the solutions are not clear cut. We look forward to continuing to engage with SPEN more broadly on finding longer term solutions.

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?

Yes, SPEN has engaged with stakeholders throughout the year, as discussed in 1. They have shown a willingness to adapt their approach when alternatives were suggested (e.g. during the development of heat maps, recent changes to required deposits). Very broad surveying has taken place which has given SPEN an excellent breadth of representation to feed into its plan.