



SSE 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, 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 SSEPD has engaged with stakeholders via a number of different routes, notably surveys, national DG-DNO working group, Scottish Renewables Working Group, attending numerous conferences, regular workshops, consortia meetings, portfolio management and face to face meetings. SSEPD engagement via the DG-DNO Steering Group and Scottish Renewables DG group has been very positive.

Engagement with third party organisations such as RegenSW, Community Energy Scotland and community working groups is also commendable and shows increased efforts to investigate innovative solutions to connection.

SSEPD has shown a willingness to adapt where requested by stakeholders – including extending the quote validity period to 90 days. SSEPD also managed the pass-through of liability charges to DG under CMP-192.

It would be useful if SSEPD 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.

Communication between SSE and developers has been found to be very positive in the North but less satisfactory in the South. We understand that SSE have taken on board stakeholder comments and we anticipate that dedicated Contract Manager/s will be appointed very shortly in the South. We view this as a very necessary and positive arrangement.

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, SSEPD has completed the activities set out in their time frame. Not listed here are heat maps and improvements to the website, which have not been completed this year but we understand will be completed in the next period. SSE are the only DNO not to have completed heat maps yet, however its innovative approach via the “heat m’app” will hopefully be a useful industry tool.

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

Yes, SSEPD has generally covered all the initiatives from the original (October 2013 issue) workplan, though it seems “checklist of what customers expect” and “application fee” have been removed, so it would be good to see an explanation of why 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. On i7 “contestable works” SSE has led 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 being developed and carried into the looking forward plan.

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, they 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 SSEPD 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, SSEPD 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. 90 day quote validity).