



UKPN 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 on 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?

UKPN has demonstrated a step-change improvement in customer engagement via a number of different routes, notably the excellent customer experience workshops, the useful DG surgeries, email bulletins and monthly shadow DG surveys. This shows significant effort to gather wide ranging stakeholder engagement via a number of different methods. We hope the customer experience workshops will continue.

We note that the monthly DG survey is referred to as a ‘shadow’ survey, and it is therefore not clear whether this DG survey will be implement as ‘business as usual’ .

It would be useful if UKPN provided statistics on the breakdown of stakeholders. For example, how many were LV or HV. This would ensure that UKPN is 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. This is why we consider surveys via email or phone to be an important contribution to stakeholder engagement, and why the shadow survey should be business as usual.

UKPN has adopted stakeholder engagement via webinar facilities. This is a fantastic development that will make communication with UKPN staff more affordable and timely when compared to face to face meetings. Nevertheless, we still believe that face to face meeting are also very important. Having an array of engagement options is very valuable.

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?

Looking at the DG service improvement plan outcomes, it appears that UKPN delivered all but one action in the allotted timescales - the introduction of convertible quotes has been delayed. It is understood that feedback was required on the success of a trial before it was rolled out, and an IT system upgrade is also required before it can be implemented. Once this upgrade occurs in Q4 2014, it will be good to see rapid progress of this outstanding activity.

There are a number of actions such as “reviewing individual/team targets” and “additional resources to shorten timescales” that we believe should be considered ongoing rather than complete. The volume of applications and the associated workloads will change regularly, therefore a review of staff and KPI’s should be an ongoing evaluation rather than a one-off task, especially in light of the admission from UKPN that “rising volumes remain challenging.”

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

Overall, it is believed from first-hand experience that most UKPN actions have been progressed well. We appreciate UKPN’s efforts to refresh and simplify the workplan presentation, however the action points in this looking-back report do not clearly map to the UKPN workplan from early 2014, which makes performance from the report difficult to comment on. For example, the subsection titled “Customer Service” corresponds to eight bulleted actions in the looking back report, but is covered by 11 specific numbered actions in the workplan. It isn’t obvious how to map the original actions to the report. The work done and outcomes are very welcome, however the reporting is generally vague and wording provides very little detail or quantification against each action. It is suggested that references or hyperlinks could also be used to ease the process of review.

There are also a number of items which were detailed in the original workplan but did not appear in the looking back report: sharing best practice with other DNOs, a customer portal, “a process for managing capacity released”, “changes to interactivity process...” , letters of authority, etc. It seems that UKPN are in fact selling themselves short in this looking back workplan, by excluding some of their achievements.

UKPN’s heat maps are updated with very useful frequency, and the updates are communicated very quickly to DG stakeholders.

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. UKPN has established a robust and varied mechanism to engage with stakeholders which has enabled a breadth of feedback. The workplan has been heavily revised over the year which seems likely to have been driven by customer feedback.