



WPD 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?

It is positive to see that WPD 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 WPD specific efforts to engage with customers such as the 6 stakeholder events, DG customer panel representation, and coordination of the LCNF conference. Less experienced/HV-LV DG customers have useful engagement opportunities via the WPD connection surgeries – we would feedback that for complex connection schemes one-to-one meetings, and technical expert availability are more important for EHV customers.

WPD should be appraised for their approach to judging the appropriate engagement method for different stakeholders. WPD’s pyramid methodology for engagement demonstrates a good understanding of customer needs and is considered a leading model, however we are not clear as to how this has been implemented from reading the report.

In comparison to some DNOs, it is useful that WPD has a record of how many parties were reached via each type of initiative, however it is unclear whether this was representative of DG customers. We request visibility in future of the breakdown between LV,HV and EHV customer participation.

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?

WPD has provided a high level summary log of their activities. This account shows how many initiatives are either 'completed' or 'on-going'. It is good to see that a number of the initiatives are completed. It should be flagged if something is actually late. There is no indication of what the original proposed delivery dates for these initiatives were, details on progress are very minimal and the outcomes are not well presented.

Some areas where WPD seem slower than other DNOs:

Compared to some DNOs WPD lags behind with the standard issue of dual quotations of contestable and non-contestable works to HV generation connections customers. It is a positive achievement that EHV customers can request dual offers since 2013 Dec. It is unclear why this is not automatic. 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 (essentially appointing the DNO to be your contestable works provider, having considered options).

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

Contrary to the report of the customer satisfaction survey, the experience of some EHV members has been that WPD has not improved their customer service specifically in the period leading from contract to construction (post connection offer –pre-connection phase). This is the experience of EHV customers and should not be considered the case for all customers. Again if feedback was collected in a targeted way by LV/HV/EHV grouping, then WPD would have a clearer view. Many of the issues faced by EHV customers appear to be caused by WPD staff being overwhelmed by HV/LV connections. WPD appears to be taking considerable time to resolve some of our EHV members issues, apparently through being under-resourced.

It is positive to see that WPD has actively participated in the initiatives common across the DNOs: the work aiming to improve customer service via design and assessment fees, and ENA type testing database production. While these initiatives are important, it should be recognized by Ofgem that all DNOs have contributed in these issues. For the purpose of this evaluation, it is more notable to consider WPD-specific initiatives: the customer checklists, the reinforcement charging clarification work, online application process, heat maps, appointment of wayleaving experts, circuit diagrams, breakdown of charges, and ICP technical information. WPD specific initiatives appear not to have been as challenging when compared to most of the other DNO work plans.

We do note that WPD is an approachable DNO when it comes to flexible connections and innovation initiatives therefore we had expected a bit more reporting back on this.

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?

There are some areas of consistent weakness that do not appear to have been taken on board by WPD over the year. For example, WPD's land rights consultation is not reported in the looking back report. The need to handle the Statement of Works process within the expected and stated timescales is not mentioned; and similarly for larger embedded customers the requirement to understand the potential impact of their projects on the transmission system.