

18<sup>th</sup> March 2015

**RenewableUK response to Ofgem's consultation:**  
**"The findings of our review of the electricity connections market"**

Dear Mr Cope,

RenewableUK is the trade and professional body for the UK wind and marine renewables industries. Formed in 1978, and with over 550 corporate members, RenewableUK is the leading renewable energy trade association in the UK.

We welcome Ofgem's research into the competition of distributed generation connections and we are pleased to see a comprehensive strategy to improve competition between DNO's and independent players. Our feedback on the consultation is listed below via the questions posed in the paper.

**1. Please provide your comments on the proposed structure and content of the CoP licence condition.**

RenewableUK believes that the proposed structure and content of the CoP licence condition is clear and comprehensive.

**2. Please provide your comments on the minimum requirements we have proposed for inclusion in the CoP.**

The breakdown below offers comment on the individual aspects of the minimum requirements.

**Point of connection**

- It is stated that DNO's must provide competitors "with equitable access to network information." We believe clarity should be provided to explain whether this access should be freely available in an immediate and limitless capacity. To allow effective competition, we believe it should be.
- Where self-determination is not possible, a time restraint should be imposed to limit delay by the DNO.

**Decision approval**

- It is questioned whether "common mechanisms to independent staff becoming an approved designer" will be consistent across DNO's? If not, this will make it difficult for competitors. It should also be made clear whether becoming "approved" is another form of accreditation, and whether there are costs and delays associated with this accreditation. If there are, there should be a limit set on the cost and time.

**Inspection**

- No time restraints have been requested, therefore there is still a chance that delays may be imposed by the DNO, resulting in the customer being dissuaded from using an independent provider.

### **3. In addition to the minimum requirements, what else should be included in the CoP?**

RenewableUK believes that DNO's should offer a clear explanation of contestable works and clear promotion of independent connection routes. All DNO connection quotes should clearly state what contestable works are and their availability from third parties, and this is something we would also ask Ofgem to look out for in the annual DNO DG workplans, as it is a long-standing request. A source of further information on the process of utilizing an independent provider and details of approved contractors should also be clearly available on the quote.

In addition, it is suggested that a relevant publication is made available offering a step by step guide to utilizing the ICP or IDNO route. This should also address perceived risks, including interfaces with other areas of policy such as applicability of Second Comer Rule, statutory land access and acquisition powers; and grace periods for Government support.<sup>1</sup> The ENA 'Distributed Generation Connection Guide' offers some guidance, however it may be valuable to create a publication specifically for pursuing the ICP or IDNO route.

We look forward to discussing the Code of Practice further with the DNOs at the DG/DNO Steering Group.

Thank you for the opportunity to respond to this consultation. I hope that the above is of assistance. If any further clarification is required, please do not hesitate to contact me and please keep RenewableUK updated with any further discussions.

Yours sincerely,

Louisa Coursey  
Small & Medium Wind Development Manager  
RenewableUK

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<sup>1</sup> Where a DNO does not deliver a grid connection in time, a grace period for receipt of ROC support is in operation.