



Renewable Energy Systems Limited
Beaufort Court, Egg Farm Lane, Kings Langley
Hertfordshire WD4 8LR, United Kingdom
T +44 (0)1923 299 200 F +44 (0)1923 299 299
E info@res-group.com www.res-group.com

Connections (electricity distribution)
The Office of Gas and Electricity Markets
9 Millbank London SW1P 3GE

Our Ref: EN01-005200

14 August 2015

Dear James,

Re: RES response to the Incentive on Connections Engagement looking forward from UKPN.

Renewable Energy Systems Limited (RES) is one of the world's leading independent renewable energy project developers with operations across Europe, the Americas and Asia-Pacific. RES has been at the forefront of wind energy development since the 1980s and has developed and/or built more than 8GW of wind energy capacity worldwide, including projects in the UK, Ireland, France, Scandinavia and the United States. In the context of this Incentive (ICE) we are therefore writing based on our experiences as an EHV/HV distributed generation connectee.

RES strongly welcome the principles of ICE, and we note the considerable improvements already made by all DNOs through the trial DG workplans under the over-arching guidance of the ENA DG-DNO steering group; such as the new or improved heat maps, published constraint information, connection offer contract clarifications, and the 'quote+' application option. We intend to provide constructive feedback in the following pages and hope the DNOs will have an opportunity to reply or redress their plans in the first instance. This year there is significant overlap with the *Competition in Connections Code of Practice* (CCCoP); while we have not commented on whether any DNOs have taken any explicit actions from CCCoP into their ICE workplans, we have looked for commitments to clarify processes and support users who choose to undertake a contestable connection, in keeping with the principles of the CCCoP. As raised at last year's DG Fora, we have been particularly keen to see commitments on the key issues of transmission system interactions and release of unused or non-progressing reserved capacity.

We look forward to seeing the progress by all DNOs with their commitments and are happy to clarify any of the specific items raised in this letter.

Yours sincerely,

Graham Pannell
Energy Networks
E Graham.Pannell@res-ltd.com
T +44 (0) 1923 299492

We found the UKPN workplan at this link, and reviewed the copy accessed on 30th July 2015:

<http://www.ukpowernetworks.co.uk/internet/en/connections/listening-to-our-connections-customers/>

This link however did not show the stakeholder engagement element, and the existence of (or link to) a separate document detailing engagement is not obvious from the workplan located there. We later found the complete ICE submission at the following page; we hope UKPN's website and publications can be altered to avoid any misunderstandings:

<http://www.ukpowernetworks.co.uk/internet/en/have-your-say/listening-to-our-connections-customers/>

1. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?

We have attended a number of UKPN's 'Customer Experience Workshops' (subsequently DG Workshops), and it does appear that issues raised there have been considered for the workplan. We welcome UKPN's participation in the ENA DG-DNO steering group. We are not aware of any surveys, interviews or similar, such as have been detailed by other DNOs.

2. Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?

Questions 2 and 3 are answered together, below.

3. Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?

We had hoped to see proactive engagement regarding **transmission system interactions** from all DNOs. For UKPN in particular this could take the form of involvement in the issue of transmission-referral for contracted DG (i.e. National Grid's 'Statement of Works', or subsequent replacement); or in developing solutions for increased capacity, such as the known constraints experienced in the SPN region. We are disappointed to not see such an action (or actions) highlighted in this plan for such a crucial DG connections issue, and which was highlighted at last year's DG Fora.

We had hoped to see proactive work in relation to releasing **unused capacity** – whether in addressing slow-moving contracted projects or operational projects which have installed less than they originally declared – and are disappointed this has not been highlighted in the plan. UKPN initiated some good work last year in writing to developers of slow-moving projects and we hoped it would build on this. The importance of this issue is plainly evidenced by UKPN's own DG connection heat maps, and the issue was highlighted at last year's DG Fora.

We are pleased to see UKPN's adoption of *service level agreement* (SLA) obligations (notably 15.3 and 15.6) as a target for improving service during the detailed design (post-offer-signature pre-construction) connection period, and look forward to seeing UKPN's (target and actual) performance against these standards. We are please in overview to see UKPN's focus on assisting customers and ICPs with their contestable works, and we give special praise for UKPN's "[G81](http://library.ukpowernetworks.co.uk/library/en/g81/)" library website¹.

Other than the omissions noted above, we would support the plan as a credible and useful suite of actions. Other than the specifics detailed below, we believe UKPN has chosen relevant outputs for these actions.

¹ <http://library.ukpowernetworks.co.uk/library/en/g81/>

On specific actions:

15.1 Enhanced mapping tool – this is welcome, we hope UKPN will catch the high standards set by SP, NPG and SSE on this.

15.3 Fault Level info - a SLA is very welcome. Will UKPN subsequently consider a target % of achieving the SLA?

15.4 Convertible quotes - we note this is an obligation of the CCCoP, and outstanding from last year's plan.

15.5 Timely Connection Agreements are increasing required to assist project finance. We welcome steps to improve timeliness but also point out that National Grid is class-leading in providing all terms for the operational Connection Agreement at the point of issuing a Connection Offer.

15.6 Protection info - a SLA is very welcome. Will UKPN subsequently consider a target % of achieving the SLA?

15.9 Capacity register - we would like to see the KPI include a commitment to regular updates, otherwise the tool may fall out of use.

15.15 We are interested in compliance with the CCCoP and particularly UKPN approach to self-determination of the POC, including a published guidance on which parties are able to self-determine.

15.16 Cost breakdowns – this has been a longstanding problem and welcome UKPN's commitment to investigate. We would like to see some kind of stakeholder consultation before UKPN commits to a final format.

15.19 Land owner authority clarifications – very welcome.

15.20 Land rights reduced timescales – very welcome and we would like to know where we can find out more, and how we can help UKPN achieve this goal.

15.26 Adoption agreement. More detail required. We would like to see an approach that allows the end customer to accept the S15 quote along with an adoption agreement process that includes the ICP. Our recent experience of accepting a S15 quote only bound us into the Adoption Agreement, with no option to include the ICP.

On a related note to action 15.20 on land rights, we hope UKPN can carefully consider its policy on compensation to land owners for damage caused to their property through UKPN's construction and operational activities, which has been an obstacle in the recent past.

4. Would you agree that the licensee's proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?

Answer exactly as per Question 1. In summary: no evidence seen in the plan, although we welcome UKPN's regular DG workshops.