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

Our Ref: EN01-005203

14 August 2015

Dear James,

Re: RES response to the Incentive on Connections Engagement looking forward report by SPEN.

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,

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

http://www.spenergynetworks.co.uk/pages/stakeholder_information.asp

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

SPEN has been very proactive in engagement to develop this workplan. We note the number of direct interviews with customers¹ and efforts to survey most connecting customers. We welcome SPEN's active participation in the EN DG-DNO steering group, and the Scottish Renewables DG Connections Working Group, both providing direct feedback on connections priorities. We also appreciate SPEN's efforts to set-up direct face-face meetings to discuss the ICE plan in person, which enabled us to join a productive session with SPEN hosted by RenewableUK. SPEN's website provides good clarity on the different documents which form the overall ICE submission.

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?

We have largely addressed question 2 and 3 together due to the structure of the plan. We greatly appreciate the separation of a plan for DG, which better facilitates review.

For all DNOs we have particularly looked for proactive engagement regarding **transmission system interactions**. This is particularly relevant in Scotland, and in this regard we are very pleased to see a dedicated section in SPEN's DG plan (DG27-29), and the related areas of non-firm access (DG23), export management (DG25) and active network management (DG22).

For all DNOs we have particularly looked for proactive work in relation to releasing **unused capacity** – whether in addressing slow-moving contracted projects or operational projects which have installed less than originally declared. In this regard we welcome action DG24 for stalled contracted projects. We are however disappointed not to see any commitment with regards unused capacity in existing operational DG connection agreements; an issue which was explicitly highlighted at last year's (September 2014) DG Fora.

In overview, we are particularly pleased to see the commitments to improve service in **land rights acquisition** (DG19) which in our experience have been a very significant obstacle with SPEN. We hope that the resulting guidance will clarify explicitly what can or should be done by an ICP or customer with regard contestable works – for example, showing all the licensing and land rights responsibilities for the development, installation and operation of a 33kV overhead line requiring 'section 37' consent; down to the detail of who performs the relevant surveys, who fills in and who files the relevant forms. We hope SPEN's review of land rights will bring clarity on SPEN's need to obtain rights with regards potential but unknown future third party connectees, and the type of rights required (for example, where a sub-lease is applicable or acceptable). We would also be grateful for clarity on progress – we can see two relevant webpages, 'Wayleaves'² and 'Regulation & Consents'³; we hope SPEN's workplan outcomes will go further than what we've seen available here as of 12th August.

¹ SPEN's 2014 (trial) plan included interviews with SPEN's own customer-facing staff. It is not clear but we hope such feedback has also been taken into account in 2015.

² <http://www.spenergynetworks.co.uk/pages/wayleaves.asp>

³ http://www.spenergynetworks.co.uk/pages/regulation_guidance_leaflets.asp

We are pleased to see SPEN recognise the importance of **cost and timeliness**, and therefore praise commitments PC2, PC4 and PC5. We have noticed increasing transparency of cost information from SPEN in recent times; we hope this is continued as it can help either party identify options for cost reduction.

Other than the omissions noted above, we would support the plan as addressing a credible, comprehensive and very useful suite of issues. We welcome the summary of last year's key achievements.

On specific actions not already mentioned:

DG1ii ...*will meet within five working days* – is appropriately specific (repeated in DG9, DG21)

DG3iii upload supporting documents – this is crucial, noting SPEN's email size policy which has previously made it difficult to share detailed drawings.

DG5iv we hope SPEN can consider UKPN's excellent G81 website⁴, with its categorised technical standards and useful index.

DG6i *monthly* capacity register updates are a minimum needed to render the tool useful.

DG7 *min & max loadings* – welcome

DG12 we hope SPEN can investigate streamlining design approval, with a commitment to shorter timescales and availability of template designs if appropriate. As per DG5, we commend UKPN's approach to presenting technical standards.

DG23 we welcome this 'consult first' approach for such a complex issue.

DG27 we hope SPEN is also involved in representing its customers in discussions with the TSO to improve or replace the SoW process.

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

SPEN has clearly listed KPIs against each action. We have therefore largely answered this question above along with question 2, but would note we are generally happy with the choice and specificity of the published KPIs. The repeated commitment of five working days for a meeting is very welcome.

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, this appears well addressed.

⁴ <http://library.ukpowernetworks.co.uk/library/en/g81/>