



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: EN01-005204

14 August 2015

Dear James,

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

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 SSE 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?

We welcome SSE'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 SSE's efforts to set-up a Connections Customer Stakeholder Panel, starting in September 2015, which should help track progress and shape future commitments, as has been successfully implemented by WPD. SSE's "ICE" webpage was easy to find and the current workplan easy to identify. Dedicated workshops and online surveys are described, although not quantified.

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.

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 pleased to note SSE's improvements to heat map information which now includes indications of likely transmission impact. The SoW tracker (#AP11) action is welcome. However, we would like to see a commitment around an improved or replacement SoW process, about working with NGET to identify and communicate solutions regarding transmission restrictions, and are disappointed not to see related actions on non-firm access, export management or active network management to mitigate transmission impact.

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. We are very disappointed not to see any commitments in this regard; an issue which was explicitly highlighted at last year's (September 2014) DG Fora.

Under 'Getting Connected', we would like to see SSE improve how it presents technical standards, as we have found the filtering tool on <https://www.ssepd.co.uk/Connections/UsefulDocuments/> of limited use. We hope SSE can look to UKPN's excellent G81 website¹ with its categorisation of technical standards and useful index.

In overview, we see SSE's suite of actions as primarily aimed at basics of connections service – simplifying and improving contract documentation and related communications, publishing guidance and clarifying processes; collectively what could be described as one-to-two shredded wheat issues. Although less ambitious than some other DNOs' plans, we recognise that this may be an important step for SSE which has lagged other DNOs in many of the identified areas, and is clearly drawn from user feedback.

We welcome the summary page on last year's key achievements. As a minor point, we'd welcome some form of numbering to refer to the actions, for ease of review and tracking. In the plan summary, we suggest

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

there is unnecessary duplication in copying an identical pattern of dots from SEPD to SHEPD; a single pattern for SSE as a whole could leave more space to better communicate the actions and KPIs.

On specific actions not already mentioned:

Staff contact maps – could a hyperlink be provided? We could not find this at 12th August.

EHV network diagrams – huge room for improvement, look forward to seeing the results.

Heat Maps – very welcome. Please note that internally we download and save a local intranet copy of the related spreadsheet which lists by substation, this may suppress SSE's KPI on 'web hits'.

Wayleaves and Legals – We look forward to the improved clarity. We hope that SSE can also look to streamline these processes, as WPD have targeted.

Register for updates – could a better KPI include the number of registrants?

Cost breakdown – huge room for improvement. We hope SSE will consult before finalising.

Standard designs for streamlined approval – very welcome, could a hyperlink be provided?

Interactivity on letter acceptance – common sense, welcome.

Adoption & Connection agreement templates – welcome, has been implemented by other DNOs.

Clear, detailed guidance on the process for engaging with and for delivering contestable works through an ICP – pleased to see SSE aiming to deliver this.

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.)?

SSE has clearly listed KPIs against each action. The degree of relevance answered along with Q2, above.

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?

Answered broadly as per Question 1, although while SSE's values and proposals for future engagement are welcome, it is not clear what evidence was used to build the current workplan. We note SSE's active involvement in ENA and TA run working groups (as per question 1) which we assume has been used, however we could not see any figures on surveys, interviews or other means used to evidence the choices in the plan.