



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: EN01-005202

14 August 2015

Dear James,

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

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

<http://www.westernpower.co.uk/About-us/Stakeholder-information/Connection-Customer-Engagement.aspx>

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

WPD has identified a good range of engagement methods, which would appear to address a broad range of stakeholders. We have been involved with WPD's *Customer Connections Steering Group* and *DG Workshop* and have been very pleased with the level of engagement and positive discussion regarding connection issues, which is evidenced in the issues chosen for the Workplan. We also welcome WPD's participation at the ENA DG-DNO Steering Group.

As a minor comment the linkages between the Workplan and some of the groups WPD use for engagement is not clear. For example, I have attended a WPD Low Carbon Hub knowledge dissemination event – it was not clear to me at the time nor as a result of this ICE submission that any feedback was being collected or used to feed into the ICE workplan.

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?

WPD is the only DNO to divorce KPIs from the activities under the workplan. From RES's collated responses this is therefore the only response which answers Questions 2 and 3 separately.

For all DNOs we have particularly looked for proactive engagement regarding **transmission system interactions**. In this regard we are pleased to see WPD's actions 1.1 and 1.10, and the explicit desire to improve the transmission impact assessment process (i.e. National Grid's 'Statement of Works', or subsequent replacement). We also hope that, with regards transmission-constrained areas, WPD will in the near future work with NGET in identifying and communicating solutions for connecting customers.

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 are pleased to see actions 5.3 and 5.4 which will help to correct future connections contracts. We are however disappointed not to see any commitment with regards unused capacity in existing operational DG connection agreements and existing legacy connection offer contracts; an issue which was explicitly highlighted at last year's (September 2014) DG Fora.

In overview, we are particularly pleased to see the range and detail of commitments to improve service in **land rights acquisition** (actions 1.8, 3.1, 3.2, 5.5) which in our experience has been a significant obstacle in the past with WPD. We would like to see WPD go further with their published guidance on achieving land rights, particularly in clarifying 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 are pleased to see direct action proposed with regards **post-offer-acceptance communications** (3.3), as raised at last year's Cardiff DG Forum.

For many of the actions I would be keen to know how I can find out more; there are many good resources on the WPD website but it is not always obvious where to look. I hope that in future Workplan editions WPD can point readers through hyperlinks to relevant webpages or online publications. For example, action 4.2 introduces “part-funded reinforcement trial”, which I think is better explained on this page:

<http://www.westernpower.co.uk/Connections/Competition-in-Connections/Part-funded-reinforcement-trial.aspx>.

Other than the omissions noted above, we would support the plan as addressing a credible, comprehensive and very useful suite of issues, although we have a concern that many of the resulting actions and performance measures are insufficiently specific.

On specific actions not already mentioned:

1.10 on statement of works – we are pleased to see this raised and would like the opportunity to support this work wherever practicable.

2.3 monthly update is a minimum requirement to ensure this is a useful tool.

2.4 review info to ICPs – seems very broad, where can we find out more?

2.5 and 2.9 clarification illustrations and flow charts – very welcome

3.1 land rights process – very welcome. We would be keen to find out more – how can we do this?

5.3 infrastructure capacity – where can we find out more?

5.4 excess capacity – where can we find out more?

5.5 Preliminary legal info – can a user register for an alert for when this action is complete?

6.1 ANM – is WPD’s webpage on alternative connections the best place for updates?

(<http://www.westernpower.co.uk/Connections/Generation/Alternative-Connections.aspx>) We have ‘registered for the updates’ using the facility on this page several months ago but have not received any updates to date.

6.2 investigate intertrip issues – seems broad, where can we find out more?

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.)?

WPD is the only DNO to divorce KPIs from the actions proposed under the Workplan. We believe this makes it more challenging to track progress against planned initiatives, and harder for stakeholders to cross-reference KPIs to actions. Taking a single example for illustration, action 1.7 (p11) promises a refined and tailored call-back procedure; but it is not clear if or how any of the KPIs listed under section 1 (p18) gives useful feedback on progress against this action.

It is very laudable that WPD are targeting such a very high score for DG-specific and broader customer survey feedback scores. However, as general statement we feel that many of the excellent initiatives in the Workplan have not been given ‘SMART’ targets. We recognise that many actions would simply be ‘publish the proposed documentation’, we have seen this in other DNOs’ plans alongside more thoughtful targets and we suggest that it works and helps to better define the action. We are not asking WPD to copy this specific issue but point for example to UKPN’s aim to provide detailed fault level information within a number of days from a customer request (UKPN action #3) as SMART.

- 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.