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

Our Ref: EN01-005206

14 August 2015

Dear James,

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

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 ENW workplan at this link, and reviewed the copy accessed on 30<sup>th</sup> July 2015:  
<http://www.enwl.co.uk/our-services/connection-services/stakeholder-engagement>

**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 not been involved in ENW's DG ICE plan developments but we note the DG customer surveys and external stakeholder panel which seems in broadly line with other DNOs. We welcome ENW's participation and leadership on the EN DG-DNO steering group.

ENW's website was not straightforward to navigate, and we would caution that users may end up at *Connection Services > Help > Useful Info > Workplans* rather than *Connection Services > Stakeholder Engagement*.

**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?**

For all DNOs we have particularly looked for proactive engagement regarding **transmission system interactions**. We are therefore pleased to note ENW's action 4.

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, as highlighted at last year's (September 2014) DG Fora. In this regard we welcome ENW's action 9 which may help with future contracted parties. However, we are disappointed not to see a commitment with regards existing contracts or operational sites.

**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.)?**

Not reviewed.

**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 along with Question 1, this appears addressed.