Open letter consultation on the Incentive on Connections Engagement: Looking Back reports 2015-16 and Looking Forward plans 2016-17

Response by Low Carbon Hub in respect of SSEPD in Oxfordshire

Section 1: Looking Back reports 2015-16

We welcome your comments and views on any elements of the Looking Back submissions for 2015-16. However, we are particularly interested in your views on the following -

1. Are you satisfied that the licensee had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the licensee implemented its strategy? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?

    - Yes, we are satisfied that SSEPD had an effective engagement strategy which was implemented.

2. Are you satisfied that the licensee had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders? Do you consider that the licensee delivered its work plan? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?

    - Overall – deeply dissatisfied.
    - The Low Carbon Hub promotes distributed generation – solar PV and hydro – in Oxfordshire. All of Oxfordshire is constrained for new generation and has been for some time. SSEPD does not seem to have any form of plan of activities to enable the Hub, its local authority and community partners to deliver the county's low carbon ambitions for Oxfordshire nor has SSEPD provided a reasonable and well justified explanation for the absence of such a plan.
    - In responding to a previous consultation, we submitted a report which showed that Oxfordshire stakeholders had lost over 1MW of capacity because of grid constraints. The report concluded that the market in Oxfordshire has effectively failed. This report has been shared with SSEPD but we have not received a response.
    - The Low Carbon Hub is also advising the Oxfordshire Growth Board (a group of all six Oxfordshire local authorities) on the energy implications of current plans to build 100,000 new homes and associated infrastructure across Oxfordshire. SSEPD have not developed any strategy in response to the published plans. At a meeting in February this year, SSEPD agreed to conduct a feasibility study to evaluate the impact of this planned growth once they had received the growth figures. These were provided in early March. It took until June to get a meeting to discuss the work, which will not be completed until September. We don't consider this is satisfactory.

- SSEPD have provided an overview of planned distribution upgrades in Oxfordshire in response to load growth. This seems to be the sole focus of their work in Oxfordshire. Even these plans are extended eg Bicester won't have a new supply until 2019.

3. Do you consider that the licensee's work plan provided relevant outputs (eg key performance indicators, targets etc.)? Are you satisfied that the licensee has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?

   - Not relevant as no plan.

4. Do you agree that the licensee's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders? If not, has the DNO provided reasonable justification?

   - We have no doubt that SSEPD has consulted a wide range of stakeholders. In Oxfordshire, we find it frustrating that our feed-back seems to have no impact on SSEPD's plans.

Section 2: Looking Forward plans 2016-17

In May this year, DNOs also submitted new "Looking Forward" plans for 2016-17. Next year we will assess how well the DNOs delivered these plans. These plans need to address issues that are important to their customers. We want your thoughts on any aspect of the DNOs' Looking Forward submissions and specifically welcome views on the following question areas -

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

   - Yes

6. 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?

   - As 2 above. Still no plan for Oxfordshire, let alone a comprehensive one, which will address the constraint issues and no explanation as to why not.

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

   - On engagement yes. On delivery in Oxfordshire, no.

8. 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?

- As 4 above. No evidence that the concerns and frustrations of Oxfordshire stakeholders have informed the plan and no explanation.

9. Where flexible connection offers are available, do you consider that the DNO's work plan for 2016-17 sufficiently addresses concerns about the uncertainty of curtailment levels? For example, do their plans ensure that stakeholders have access to the data they require for an investment decision?

- Oxfordshire is constrained by fault levels. SSEPD tell us it is therefore not possible to offer flexible connections.

10. Where consortium connections are available, do you consider that the DNO's work plan for 2016-17 reflect requirements for clear and detailed information about where, how and under what conditions such projects can proceed?

- We are not aware that consortium connections are yet available in Oxfordshire.

11. Where flexible or alternative connections are not currently available in constrained areas, do you consider that the DNO's work plan for 2016-17 either include steps to provide information about when these types of connection will become available? Or that the DNO has justified why these are not available?

- No to both questions.

12. Do you consider that the DNO's work plans include appropriate engagement to ensure that network investment plans are well communicated to stakeholders, including when new capacity will become available?

- No. It is disappointing that the only way to establish whether there is capacity is to make an application. SSEPD operate in a reactive mode. They do not volunteer when capacity will become available.

13. Do you consider that the DNOs' plans include appropriate activities to improve, where necessary, the provision of information on constrained areas of the network to provide better data about where connections may be viable?

- No. See 12.

14. Are there particular additional activities or outputs which you consider should be included in the work plan of activities to better facilitate grid connections?

- An analysis of areas constrained for new generation connections and the plans for resolving the issues.

Conclusions

On the positive side, we believe that SSEPD are good at engaging with stakeholders. In particular, they respond promptly when asked to meet Oxfordshire stakeholders.

On the other hand, our experience of delivery is disappointing. SSEPD recognise the problems caused by constraints in Oxfordshire but have no plans to deal with them. They have not explained why. Their strategy is just to react to connection requests.

In our experience therefore the incentive is not delivering for Oxfordshire.

We would like SSEPD to be an active partner in solving the constraint issue and helping drive forward the low carbon agenda in Oxfordshire. It may be there in other parts of its network but it is not there in Oxfordshire.