

Green Hedge Energy UK Limited
19 Nassau Street
London
W1W 7AF

James Veaney
Head of Connections and Constraint Management
Ofgem, 9 Millbank, London, SW1P 3GE

27th July 2017

Dear James,

Re: Open letter consultation on the Incentive on Connections Engagement: Looking Back Reports 2016-17 and Looking Forward Reports 2017-18

Green Hedge is a leading developer and operator of low carbon electricity generation and storage projects. Our Energy Storage division has created the pioneering Energy Barn™. and works closely with the wider Green Hedge group, distribution partners and with world-leading technology providers to develop and deliver best-in-class energy storage projects that benefit the UK energy system at large. With a track record of developing over 200 megawatts of large-scale solar PV systems to date, and a leading position in the emerging UK energy storage market.

We strongly welcome the initiative on the Incentive on Connection Engagement which we believe has encouraged the DNOs to improve their services for Connection Customers. For this particular year, we have just focused our responses on Scottish and Southern Electricity Networks as we think particular attention has to be focused on their Statement of Work process and clarity of the System of Charge.

We hope the comments in our response could be used to improve SSE's performance for the period 2017-2018.

Yours sincerely,



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Question	Response											
About you and your work												
1. What is the name of your company?	Green Hedge Energy UK Limited											
2. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)? Please indicate clearly in your response to the questions below whether your comments refer to the DNO's plans as a whole, or to one of the DNO's licence areas. If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.	9) Scottish and Southern Electricity Networks											
3. What type of connection do you generally require? And for each type of connection, how many connection applications, including total MVA (Mega Volt Ampere) of connections have you made in the past year? Please note that we will assess storage within the relevant metered generation market segment.	<table border="1"> <thead> <tr> <th>Type of connection-</th><th></th><th>Total number of connections</th><th>Total MVA of connections</th></tr> </thead> <tbody> <tr> <td rowspan="2">Metered Distributed Generation (DG) Battery Energy Storage Systems (BESS)</td><td>LV work</td><td></td><td></td></tr> <tr> <td>HV and EHV work</td><td>Approx. 180</td><td>Approx. 2,000</td></tr> </tbody> </table>	Type of connection-		Total number of connections	Total MVA of connections	Metered Distributed Generation (DG) Battery Energy Storage Systems (BESS)	LV work			HV and EHV work	Approx. 180	Approx. 2,000
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Metered Distributed Generation (DG) Battery Energy Storage Systems (BESS)	LV work											
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Consultation questions												
Section 1: Looking Back report 2016-17												
<i>We want your views on how well the DNOs have performed over the last year</i>												
1. Are you satisfied that the DNO had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the DNO implemented its strategy? If not, are you satisfied that the DNO has provided a reasonable and well-justified explanation?	9) Scottish and Southern Electricity Networks Yes, we are generally satisfied with the structured engagement SSE has committed to its stakeholders. SSE has delivered a clear and consistent engagement programme and ensuring stakeholder feedback is appropriately fed-into business. We recognise SSE has encouraged its stakeholders to participate in the development of its strategies through workshop, surveys and other methods of communication.											

<p>2. Are you satisfied that the DNO had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders? Do you consider that the DNO delivered its work plan? If not, are you satisfied that the DNO has provided a reasonable and well-justified explanation?</p>	<p>9) Scottish and Southern Electricity Networks</p> <p>We are very satisfied with the high level of Engagement Activities for these period for general new connections. However, it would have been very useful to have more BESS workshops in relation to Statement of Works procedures and how it could affect a potential scheme.</p>
<p>3. Do you consider that the DNO's work plan provided relevant outputs (egg key performance indicators, targets etc.)? Are you satisfied that the DNO has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?</p>	<p>9) Scottish and Southern Electricity Networks</p> <p>Not able to comment on the broad extend of the work plan's output. Although, in relation to the Statement of Work we strongly believe SSE did not meet its target and further improvement must be done. We were left with vague explanations for justification of the outcome.</p>
<p>4. Do you agree that the DNO's strategy, activities and outputs have considered ongoing feedback from a broad and inclusive range of connections stakeholders? If not, has the DNO provided reasonable justification?</p>	<p>9) Scottish and Southern Electricity Networks</p> <p>Yes, we agree that previous feedback and activities have been taken into account, improving SSE's services for connection customers.</p>
<p><i>The following two questions refer to the specific areas we discuss in our letter – meeting the needs of all types of connections customers, and connecting when the networks are constrained.</i></p>	
<p>5. Do you consider that the DNO's activities and outputs over the past year were adequate in meeting the needs of all types of connection customers, including the particular needs of newer types of connection customers?</p>	<p>9) Scottish and Southern Electricity Networks</p> <p>We consider SSE did cover most of the needs for new connection in unconstrained areas, however, more works need to be done for new connection on areas were DNO reinforcement works are needed.</p>
<p>6. Do you consider that the DNO's activities and outputs over the past year were adequate in meeting the needs of customers looking to connect when the networks are constrained?</p>	<p>9) Scottish and Southern Electricity Networks</p> <p>We strongly believe more work needs to be done in constrained areas and more importantly in accepted connections affecting NGET network.</p>
<p>Section 2: Looking Forward plans 2017-18</p>	
<p><i>We want your views on what the DNOs aim to achieve in the coming year</i></p>	

<p>7. Are you satisfied that the DNO has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?</p>	<p>9) Scottish and Southern Electricity Networks</p> <p>We are satisfied in general in how SSE has engaged with connection stakeholder feedbacks. However, we suggest there is room for improvement for Statement of Work procedures.</p>
<p>8. Do you agree that the DNO has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the DNO provided reasonable and well-justified reasons? What other activities should the DNOs do?</p>	<p>9) Scottish and Southern Electricity Networks</p> <p>Yes, in relation to the process of new connection and Connection Competitions in unconstrained areas.</p> <p>We would welcome the inclusion to provide more information related to detailed costing associated with works in the Connection Offer as well as to explain the calculation of the contribution cost by the customer towards DNO reinforcement work.</p> <p>Continuous improvement to the information provided on the interactive capacity map and substation location would be advantageous to the stakeholders. For example, it would be helpful the effort to expand the information of each substation to include as well Statement of Work feedback from previous application. In addition, we support the development of Shape or KLM/KLZ files of the substations and overhead/underground HV/EHV cables to be available for the stakeholder to download.</p> <p>We would also strongly support any efforts to be linear and to act transparently in regards to the process of Statement of Works and system of charge for Connection Offers accepted. As an active connection customer, we have been largely affected both by the delayed in the process and outcome of Modification Applications/Project Progressions as well as the clarity of the fees charged.</p>
<p>9. Do you consider that the DNO has set relevant outputs that it will deliver during the regulatory year (eg key</p>	<p>9) Scottish and Southern Electricity Networks</p>

performance indicators, targets, etc.)?	Yes, key performance indicators have been provided. We would like to see more performance improvement and targets for Statement of Work process
10. Would you agree that the DNO'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 DNO provided robust evidence that it has pursued this?	<p>9) Scottish and Southern Electricity Networks</p> <p>Yes, it has been presented in a clear and structure manner. However, we suggest more clarity needs to be presented on the structure of Statement of Work.</p>
<p><i>The following two questions refer to the specific areas we discuss in our letter – meeting the needs of all types of connections customers, and connecting when the networks are constrained.</i></p>	
11. Do you consider that the DNO's planned activities and outputs will be sufficient to meet the needs of all types of connection customers, including the particular needs of newer types of connection customers? What other activities should the DNO undertake in this area?	<p>9) Scottish and Southern Electricity Networks</p> <p>We acknowledge the strategic plan in clear and very pragmatic for new connection. However, we believe the data for SSE works to improve constrained area is very limited. It also applies to the activities and outputs for Statement of Work process.</p>
12. Do you consider that the DNO's planned activities and outputs will be sufficient to meet the needs of customers looking to connect when the networks are constrained? What other activities should the DNO undertake in this area?	<p>9) Scottish and Southern Electricity Networks</p> <p>We recognise the challenge to evaluate constrain areas for both DNO and the stakeholder. We believe more detailed data, process and activities should be presented for the connection costumers. In regards to our BESS connections, we strongly believe more information should be given when constrains are given at "n-1" level. We suggest SSE to be clearer in historical outages data as well as at to what level they occur, whether they are subject to DNO or NG network.</p>