

Annex 1 – Open letter consultation on the Incentive of Connections Engagement

- 1.1. We would like to hear the views of interested parties in relation to any of the issues set out in our open consultation letter.
- 1.2. We would especially welcome responses to the specific questions in our consultation, which are replicated below.
- 1.3. If you have any questions on this document please contact:

James Veaney
Head of Connections and Constraint Management
Ofgem, 9 Millbank, London, SW1P 3GE
020 7901 1861
Connections@Ofgem.gov.uk
- 1.4. **Responses should be sent, preferably by e-mail by 27 July 2017 to the address above.**
- 1.5. Unless marked confidential, all responses will be published by placing them in Ofgem's library and on its website www.ofgem.gov.uk. Respondents may request that their response is kept confidential. Ofgem shall respect this request, subject to any obligations to disclose information, for example, under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004.
- 1.6. Respondents who wish to have their responses kept confidential should clearly mark the document/s to that effect and include the reasons for confidentiality. Respondents are asked to put any confidential material in the appendices to their responses.
- 1.7. Next steps: We will consider the responses to this consultation and these will be used alongside other evidence for our assessment of the ICE plans.
- 1.8. Each of the questions asked by this consultation is set out in the template below.
- 1.9. Please ensure that you **indicate the DNO group or specific licence area** to which your experiences relate.
- 1.10. Please ensure that you indicate clearly the type of connection you generally require.
- 1.11. When considering your responses to these questions, please consider your experiences, the actions that the DNO has undertaken or committed to undertake, and the actions that you consider it could reasonably undertake.

Response template – Incentive on Connections Engagement June 2017

Question	Response																																		
About you and your work																																			
1. What is the name of your company?	Dudley Metropolitan Borough Council																																		
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.	Western Power, West Midlands licence area																																		
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 colspan="2">Type of connection</th><th>Total number of connections</th><th>Total MVA of connections</th></tr> </thead> <tbody> <tr> <td rowspan="4">Metered Demand Connections</td><td>Low Voltage (LV) Work</td><td></td><td></td></tr> <tr> <td>High Voltage (HV) Work</td><td></td><td></td></tr> <tr> <td>HV and Extra High Voltage (EHV) Work</td><td></td><td></td></tr> <tr> <td>EHV work and above</td><td></td><td></td></tr> <tr> <td rowspan="2">Metered Distributed Generation (DG)</td><td>LV work</td><td></td><td></td></tr> <tr> <td>HV and EHV work</td><td></td><td></td></tr> <tr> <td rowspan="3">Unmetered Connections</td><td>Local Authority (LA) work</td><td>500 approx</td><td>Negligible</td></tr> <tr> <td>Private finance initiatives (PFI) Work</td><td></td><td></td></tr> <tr> <td>Other work</td><td></td><td></td></tr> </tbody> </table>	Type of connection		Total number of connections	Total MVA of connections	Metered Demand Connections	Low Voltage (LV) Work			High Voltage (HV) Work			HV and Extra High Voltage (EHV) Work			EHV work and above			Metered Distributed Generation (DG)	LV work			HV and EHV work			Unmetered Connections	Local Authority (LA) work	500 approx	Negligible	Private finance initiatives (PFI) Work			Other work		
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Consultation questions	
Section 1: Looking Back report 2016-17	
We want your views on how well the DNOs have performed over the last year	
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?	Based on information received from our ICP, Western Power Distribution (WPD) has a robust and well managed strategy for enabling competition.
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?	Our ICP has no particular problem with the way in which WPD conducts their relationship with them; they have a key point of contact with whom to raise issues as and when they occur and the system works well.
3. Do you consider that the DNO's work plan provided relevant outputs (eg 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?	I don't have information on this particular aspect of the relationship between WPD and the ICP.
4. Do you agree that the DNO'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?	While relationships are very good and no problems are being experienced, it has to be said that the DNO/ICP construction and adoption process is a considerable overhead to the ICP's business, and the cost is much higher than that the DNO incurs for the same operation carried out by the DNO on its own network. This is true of all DNOs with which the ICP engages with though and not just WPD.
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.	

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?	As far as Dudley Council's Street Lighting Service are concerned the DNO are not providing barriers to a better service by the ICP. However, if some of the more onerous restrictions on working – such as the seven day notice period for connection works – were reduced or even removed the service would be even more timely.
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?	See 5 above.

Section 2: Looking Forward plans 2017-18

We want your views on what the DNOs aim to achieve in the coming year

7. Are you satisfied that the DNO has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	It would appear so – although Western Power's meetings with connections customers are sporadic and apparently geared to winning some of the connections business back to WPD. It would be better in my opinion if the customer could be a party to discussions between ICP and DNO, without infringing confidential business relationships of course.
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?	As far as I am aware, given the constraints mentioned above, WPD's work plans and timescales are satisfactory.
9. Do you consider that the DNO has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?	Not known.

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?	See 7 above.
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.	
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?	I can only speak for the very narrow range of LV unmetered connections that Dudley Council procure, and again given the constraints before mentioned the process is satisfactory.
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?	For the low MVA connections that Dudley Council require generally network constraint has not been a factor.

Annex 2 - Map showing DNO licensee areas¹

Electricity Distribution



¹ Image from Electricity Networks Association (ENA) – note the ICE only applies to distribution networks operating in GB