

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?	<p>Kyle of Sutherland Development Trust. (KoSDT).</p> <p>http://www.kyleofsutherlanddevelopmenttrust.org/</p> <p>Filled in by Andy Wright/ Balchrach/ Ardgay/ IV24 32BP (Director)</p> <p>We have made enquiries about connection, never been a customer.</p>																								
<p>2. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)?</p> <p>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.</p> <p>If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.</p>	<p>Area 1 in Annex 2, Highland Region. Our specific interest in this submission is the area around the Kyle of Sutherland An area centred on Bonar Bridge and Ardgay.</p> <p>These observations on the whole policy document.</p> <p>Though as explained below our micro-hydro project is presently in hibernation. It waits for a more favourable environment.</p> <p>This makes many of the questions in this form difficult to answer/ not relevant, as our experiences have not moved much beyond scoping.</p>																								
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?	<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</td><td>LV work</td><td></td><td></td></tr> <tr> <td>HV and EHV work</td><td></td><td></td></tr> </tbody> </table> <p>Please note that we will assess storage within the relevant metered generation market segment.</p>	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	LV work			HV and EHV work		
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	Generation (DG)			
	Unmetered Connections	Local Authority (LA) work		
		Private finance initiatives (PFI) Work		
		Other work		

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?	<p>It might be that the following questions, in this document, do not fit our context, which dates back to 2015, when KoSDT scoped a micro hydro on the Kilmachalmach burn. (13Km north West of Bonar Bridge).</p> <p>In this we were constrained by a weak grid connection to a maximum export of 50KW, rising, maybe, to 95KW in 2020. The stream/ river has capacity of 500KW, were it to be possible to fully exploit its potential. But the cost of the grid connection, combined with the degression in FiT has made our project, financially, unviable. We are satisfied that the discussions we have had with SSEPD these and associated costing have made make sense; the distance to a reasonable 'node' on the grid being 5-7Km, the cost of the re-inforcement necessary not affordable at this stage.</p> <p>Our immediate situation for grid connection further complicated by two wind farm project proximal to our micro-hydro; both at scoping stage at present.</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?	N/A
3. Do you consider that the DNO's work plan provided relevant outputs (eg key	N/A

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?	
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?	<p>Were it possible for KoSDT to have it's 'own' electricity, not only could this provide income to the Trust, it would also be possible to use the electricity, via intelligent networks etc. to address the very real issues of fuel poverty within our area. Using the likes of Sunamp heat batteries surplus electricity from this micro hydro as well as other community electricity could be deployed to great effect (plus electric car charging etc.).</p> <p>So although one imagines that the DNO have functioned reasonably in the previous time frame, it is not clear if this will be the case in the very near future. There is ambient electricity available and not being fully exploited to best benefit of our community. This difficulty will become more apparent rapidly as new technologies become more available, but possibly less available with distances such as we have to address in the KoSDT area</p>
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 above
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?	The listing of events 16/ 17 most comprehensive.

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?	The aspiration towards 'flexible, decentralised models'? Use of such models including appropriate technology such as large mobile batteries may address issues; I'm not clear that the strategy engages all such future possibilities (or can at this stage?). But a flexible strategy of electrical distribution from local wind power and local hydro does 'sit' well with aspirations of local generation of electricity and local usage.
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?	Yes, though as a non-customer, as yet, hard to answer
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.)?	
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?	Yes
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.	

<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>	<p>Yes, though meeting requirement of this micro-hydro will need support in some measure that is at present not available/ obvious.</p>
<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>	<p>Where constraints are in place investigate alternative strategies (Convert to hydrogen on site, rechargeable batteries of container size that can be moved etc.)</p> <p>Ideally, in our area we need much of the electricity supply in our glens reinforced, ideally, to support businesses, with 3-phase.</p> <p>Not sure how we will all charge our EV's, when in this glen (Strath Carron) the lights dim when someone switches on a kettle at the top of the glen (not quite!)</p>

Filled in by Andy Wright for KoSDT. Thursday, 27 July 2017

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