

The Office of Gas and Electricity Markets  
9 Millbank  
London  
SW1P 3GE

12<sup>th</sup> September 2017

**Ref: Consultation document on penalties for the distribution network operators**

Following on from your recent call for responses to the above consultation, please find below our response and views.

We are regularly involved with UK Power Networks within the Distributed Generation arena of works as we are a developer of Low Carbon generation projects. The feedback provided in the response would appear to be from a small section of stakeholders and I do not believe this to be true across the marketplace and the views of the many other external stakeholders I talk to. These views do not fairly reflect the improvements we have seen over the last few years. This penalty feels excessive based on our experiences.

We regularly attend the UK Power Networks DG Forums. These forums provide us, as stakeholders, with great opportunities to discuss challenges and issues we may have with both the senior management, but also across the broader team.

The levels of customer engagement have improved significantly over the last few years, their processes for engaging with stakeholders are now robust and they continually seek feedback from us to help us influence and improve their processes and engagement.

We view and receive UKPN's service improvement plan and this allows us to feedback views, etc. to allow them to develop improvements in line with feedback.

We work throughout the UK and our experience is that UK Power Networks lead the way in terms of both service improvement and stakeholder engagement.

The approach offered of having our own PM for the 'life' of our project is significant for us, as we are able to build a strong and healthy relationship with that person. This allows both parties to understand the viability of a project at an early stage and allow everyone to focus on the good schemes.

The ability to have face to face meetings and attend DG Surgeries where we can understand the challenges of UK Power Networks network and the subsequent restrictions on it at an early stage are a great example of UKPN's engagement leading the way. A DNO that is willing to work with us is refreshing.

In response to your questions posed in the consultation, we would like to respond specifically to some.

Q1. As I have mentioned previously in this, the up-front engagement, the use of surgeries, a willingness to talk and engage at an early stage in the process and also the use of DG Heat Maps (showing both Import and Export availability), has led to us as stakeholders receiving a better level of service and a reduced wait time for our quotations to be issued. We, like many others will explore a number of schemes at one time to ensure that we have a higher chance of success. This early engagement and responses, allow us to reduce our wasted effort on a scheme and helps improve our customer experience and reduces our lost expenditure. The impact that this has on UKPN is also significant, as better educated stakeholders leads to a reduction in volumes of wasted schemes and effort, allowing a better level of service to be offered.

Q15. UK Power Networks allocate us with a single point of contact on our schemes. Post application and once it has been confirmed that all relevant minimum information is received by UKPN, we will then receive the specific contact details of our Commercial Project Manager for our scheme and an introduction to them. From this point forward, we can liaise closely with them and ensure that any challenges or issues are dealt with swiftly and competently.

Q16. The lead times on quotes have dropped over the last couple of years. We now expect and receive the ability to engage with our PM throughout the process. This extra engagement has meant that we are able to focus our efforts on schemes with a high chance of success and allow all parties to reduce the expenditure of time, energy and effort on schemes which aren't going anywhere. The quotes are a challenging document to produce and require the input of multiple parts of UKPN's business so we know that we will not receive a quote in most cases within a week, but the improvement from the 69 days to a shorter period has been great to see and has helped make a difference to our business.

Q17. UKPN have been very pro-active with their levels of engagement over the last few years. They host regular DG surgeries at which we can explore their network and challenges with them. This runs on it to the quoting process where we have been appointed a single point of contact to manage our schemes through. If we have any schemes where there may be different elements

involved (e.g. A.D Plant @ EHV and Farm alterations @ LV), we are fortunate that we only need to deal with a single Point Of Contact to manage the whole scheme through for us.

At the various Forums and other UKPN events I attend, the sharing of information has been a key message and this information flows both ways to and from them. Our views and opinions as stakeholders are listened to, reviewed and if necessary acted upon in a timely and efficient manner.

We appreciate your time on this matter and hope you are able to fully review the response and feedback to us the final decisions you make on this.

Kind regards,

Colm Killeen  
Director