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

10th September 2017

Ref: Consultation document on penalties for the distribution network operators under the Incentive on Connections Engagement

Dear Sirs,

Further to your recent request for views on your consultation document on penalties for the distribution network operators under the Incentive on Connections Engagement, I would like to provide my feedback and response on some of these concerns.

Whilst I spend time dealing with all the UK based DNO's, the bulk of my engagement is with UK Power Networks and within the Distributed Generation arena (HV & EHV Metered DG), but I also deal regularly with both their small service teams (LV works) and also their projects teams (LV & 11kV metered supplies)

UK Power Networks have steadily improved their customer engagement over the last 4-5 years. They have established a robust process for their various engagements with stakeholders across the business. They are continually seeking feedback from their stakeholders to help improve their processes engagement further.

We are regularly attend forum (Connections and DG) and have opportunities to discuss relevant issues with the senior management team. Stakeholder feedback is addresses through their service development plan, which represents what is most important most to us and they continually evolve this to develop improvements in line with our feedback.

Having reviewed the feedback provided within the consultation document, the feedback is obviously from a small section of customers and does not accurately reflect the changes and significant improvements we have seen and experienced in the service over the last couple of years. To apply a penalty of this scale based on this feel un-fair and un-just. We are disappointed that the hard work which has been undertaken and positive feedback from stakeholders does not appear to have been considered when imposing this fine.

I work across all UK DNO footprints in my role and my experience is that UK Power Networks, lead the way in terms of both service improvement (reduction in quote times, etc.) and customer engagement. When we have a new scheme, we are able to engage directly with the Project Managers at an early stage to understand the viability of a project and likely challenges to ensure we can all focus our efforts on viable projects. As soon as our project is within the business, we are informed of our contacts details and we continue to liaise with the single point of contact from conception to completion. This has helped to reduce quote times for us as it has meant any questions or queries can be easily shared and resolved.

Our PM's are always happy to talk at an early scheme and arrange site visits and work with us on options for connection. The ability to have face to face meetings at an early stage are a prime example of where UKPN's engagement is leading the way. The willingness to work with us and take a flexible approach, is both refreshing and key for all.

I would like to also respond to some specific questions and points you have raised.

Q1.

Through UK Power Networks 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 monthly updated DG Heat Maps (showing both Import and Export issues), this has led to a fall in Quote times as queries are being resolved earlier and customers are able to focus on schemes with a good chance of success, rather than continually bombarding UKPN with non-viable schemes. If a scheme is challenging, our single point of contact will engage with us and explain challenges etc. allowing us to make an educated decision on whether to proceed or not. This early engagement reduces workload and allows an improved level of customer service and shortening of Quote times due to a reduction in enquiries.

Q15.

With each new project submitted, we are allocated a single point of contact to manage the scheme through from conception to completion. Within a couple of days of submission and receipt, we get introduced to our dedicated Project Manager (PM) and share contact details, etc. Our PM is always willing to engage with us and share any challenges or concerns there may be with the viability of our project. We stay in contact with the PM regularly during the process. I insert below an excerpt of what we are issued by UKPN:

From: "Boyle, Gemma" <Gemma.Boyle@ukpowernetworks.co.uk>
Date: 8 August 2017 at 03:59:31 GMT-4
To: Keir Spiller <keir@mjsgrid.co.uk>
Subject: 8200016762 - Old Church Road, Brentwood. CM13 1XB

Dear Mr Spiller

Thank you for your recent enquiry regarding the above project.

Your job has been allocated to our Project Manager Babs Sahota (contact details below) who will work with you to develop your electrical design requirements:

Mobile: 07875 111824
E-mail: babs.sahota@ukpowernetworks.co.uk

It will be helpful if you can quote your project reference number on the subject line for any future correspondence.

For more information about attending one of our generation workshops and details of our heat map please visit our website:
<http://www.ukpowernetworks.co.uk/internet/en/our-services/list-of-services/electricity-generation/>

Kind Regards

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Q16.

My experience is that the lead times on receiving quotes from UK Power Networks has improved significantly over the last 2 years. The ability to engage with our UK Power Networks Project Manager up-front has meant that we, and other Stakeholders I talk to, have been able to focus on schemes with a high chance of success and by either not-submitting or withdrawing projects once all information has been disseminated and understood, has led to a shortening in time to issue the quote. Whilst we would all like our quotes the day after we submit the information, UKPN's network is fluid and challenging (as are all the DNO's) and we understand this and the challenges it leads to. To have seen the improvement over the last 18 months to 2 years has been a significant achievement and has improved the image of UKPN in the market and with their stakeholders.

Q17.

To achieve this, I expected UK Power Networks to ensure that large amounts of up-front engagement were utilised. They have delivered this by the use of:
Surgeries (both DG and Load) which have allowed us to explore opportunities without being beholden to specific capacities and land depending on scenarios.

The use of Single Points of Contact within their teams. We always know who to speak to and they are always willing to work with us on our projects. If I have diversionary works and new supplies, etc. we only deal with our PM for all elements.

Improving internal systems and collaboration. From discussions with the UKPN Project Managers, the new systems and business transformation which they have gone through has helped with meeting this challenge. The sharing of information internally is smoother and means that better decisions can be taken earlier to reduce wasted or repeated effort.

I hope that my response above is of some use and allows you to make a fully justified and informed decision on the fairness of your proposed fine on UK Power Networks.

Regards

A handwritten signature in dark ink, appearing to read 'Keir Spiller', is shown on a light background.

Keir Spiller
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