

18 September 2017

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

Dear Andrew Wright,

This letter is sent in response to the request for views on the penalties for the Distribution Network Operators (DNOs) under the Incentive in Connection Engagement (ICE) plans.

I've worked in the solar industry since 2009, I am the COO of Push Energy and I also act as a grid/technical advisor to numerous trade associations and investors. As part of my technical advisor role I sit on the ENA's DG Forum, I attend generator meetings run by the DNOs, I sit on the ENA's Open Networks Project and have a confirmed place in Ofgem's Smart Systems Forum. I work alongside the DNOs every day.

My team at Push Energy also works closely with the DNOs every day (mostly UKPN & WPD) to develop new projects, alter existing connections, and manage existing connections. We are shocked at the feedback you'd received from other stakeholders, our experience has not been similar. The negative feedback appears to be very specific, therefore, we believe that fines at this scale are unjustifiable.

We provided feedback to the DNOs on their ICE plans earlier this year and after reviewing what had been done and the future commitments, we are more than happy with what has been achieved.

UKPN and WPD set up Owner-Operator Forums as their own initiatives, other DNOs are yet to follow (SSE recently started). Proactive and positive behaviour must be rewarded; ICE plans don't fully recognise the effort the DNOs put into to making things happen. Additionally, SSE & WPD recently attended additional face to face meetings with asset owners through the Solar Trade Association, an action not recognised on the ICE plan!

As I understand it, DNOs are able to choose the number of commitments put forward in their ICE plan. I think these fines only discourage this positive behaviour when the DNOs merely set ambitious goals as they want to deliver good things for their stakeholders.

I have been a member of the DG Forum for over 2 years, and I have only ever experienced positive engagement on connection issues and ICE plans. I hope you consider my feedback when you finalise the fines imposed.

Your sincerely

Nicola Waters

Push Energy Limited
Chief Operations Officer