

Andrew Wright
Senior Partner, Energy Systems
Ofgem

15th September 2017

Dear Mr Wright,

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

Green Frog Development Solutions Ltd manage the acquisition and development of gas fired generation plants across the UK on behalf of Green Frog Power Ltd.

The Green Frog Group have built more capacity than any other British company in the past five years. We have circa 485MW of plant in operation and a construction pipeline exceeding 300MW. The entire fleet can start from cold in less than two minutes.

We welcome the opportunity to respond to Ofgem's Consultation on penalties for the distribution network operators under the Incentive on Connections Engagement.

Green Frog Development Solutions work closely with the six Distribution Network Operators within the fourteen licensed areas across the UK.

Over time we have developed a strong relationship with each DNO and generally find that they provide good customer service, enabling us to apply for and secure connections quickly and efficiently.

Green Frog Development Solutions submit more than fifty ENA applications a week, across all of the DNOs. Therefore, we believe we have a good overall knowledge of their levels of performance. It is clear that each DNO does have several technical and operational challenges in delivering on the connection process and meeting timescales and may, on occasion, fall short of the standards outlined in the Incentive on Connections Engagement. However, we feel that due to our healthy relationships with the DNOs and open honest communication, we are able to overcome any issues that arise during the application and connections processes, ordinarily without the need to escalate our issues either within or outside the DNO's organisation.

It is clear to us that the DNOs have been and continue to respond to the incentives under ICE. We believe that the incentive route to continuous improvement in service is more appropriate than a penalty regime.

As a result of this, we do not support the proposed penalties.

Yours sincerely,

Chloe Goding
Connections and Regulation Manager
Green Frog Development Solutions Ltd



