

Response template – Incentive on Connections Engagement

Question	Response																																
About you and your work																																	
1. What is the name of your company?	Centrica Plc – Distributed Energy & Power (DE&P) division																																
2. Which DNO's ICE submission is your response related to? 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. If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.	Western Power Distribution (WPD) This response is for the DNO's plans as a whole.																																
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 Generation (DG)</td><td>LV work</td><td colspan="2" rowspan="2">We require DG connections.</td></tr> <tr> <td>HV and EHV work</td></tr> <tr> <td rowspan="3">Unmetered Connections</td><td>Local Authority (LA) work</td><td></td><td></td></tr> <tr> <td>Private finance initiatives (PFI) Work</td><td></td><td></td></tr> <tr> <td>Other work</td><td></td><td></td></tr> </tbody> </table>	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 Generation (DG)	LV work	We require DG connections.		HV and EHV work	Unmetered Connections	Local Authority (LA) work			Private finance initiatives (PFI) Work			Other work		
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Consultation questions								
Section 1: Looking Back report 2017/18								
We want your views on how well the DNOs have performed over the last regulatory year								
Your engagement with the DNO								
1. How many DNO stakeholder engagement events have you been invited to this year? (This can include engagement outside official events)	none	1	2	3	4	5	6	>6
2. How many DNO Stakeholder events have you been to? This can also include meetings outside of official engagement events	none	1	2	3	4	5	6	>6
3. Tell us about how the DNO engaged with you a) What did the DNO do? b) How did the DNO do it c) Did the DNO have a robust engagement strategy?	<p>Centrica DE&P employees are on a DNO stakeholder e-mail lists and have attended events where possible. We have not kept a record of the number of events invited to or attended, therefore cannot complete Q1 and Q2.</p> <p>WPD has a Connection Customer Steering Group as its main connections engagement tool and an annual Distributed Generation Stakeholder Workshop – online materials and conclusions from these are published online and convey discussions well. Centrica is not involved in the CCSG so the material being made available afterwards is very useful.</p> <p>We'd welcome online options to join engagement events e.g. webinars.</p> <p>Reviewing the Looking Back report and other written material available on line suggests that WPD has a logical and robust approach to engagement. Events that we attended in the past year have been well run.</p>							
The DNO's work plan								
4. Objectives: Have you seen the DNOs work plans?	Yes.							

<p>a) Does it take into consideration your needs? If so, how?</p> <p>b) If it doesn't please explain why</p>	<p>a) Yes. The 2017 work plan linked into a number of areas where we have been keen to see improvements across the DNOs e.g. clearer information on the connections process, better information on where capacity is either available or constrained, a clearer more streamlined Statement of Works process and other work to improve connection journey for customers.</p> <p>The WPD 2017 work plan is very granular – which is good, especially in identifying practical 'marginal gains'.</p> <p>b) The plan did not address the “elephant in the room” – getting connected at reasonable cost without the need for alternative (i.e. non-firm) connections.</p> <p>One area where it does not meet our needs is around flexible connections, in the sense that we are concerned that all DNOs are moving towards an over-reliance on Active Network Management (ANM) which could undermine the investment case for storage and other flexible DER. We believe that DNOs should develop commercial markets to procure services from flexible DER as an alternative to curtailment – noting the innovation projects WPD and other DNOs have on this topic.</p>
<p>5. Actions: Do you think the DNO has delivered its work plan?</p> <p>a) How has the DNO done this?</p> <p>b) If you do not think the DNO has delivered its work plan, please explain why</p>	<p>Yes.</p> <p>a) Appendix 1 describes the 'End of Year Status' for each sub-action. This is more useful than the KPIs in understanding what WPD has done to deliver its work plan, where relevant with links to the actual output.</p> <p>b) The GB network operators need to be acting together to free up capacity for DG connections, progress is not as fast as it needs to be.</p>
<p>6. Outputs: Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why</p>	<p>Yes – reasonably and for the purpose of the incentive.</p> <p>Reading the 'End of Year Status' column in Appendix 1 and the 'Update' section in Appendix 2 is more useful to understand how WPD delivered.</p>
<p>Your feedback on performance</p>	

7. Do you think the DNO's strategy, activities and outputs have taken into account ongoing feedback from broad and inclusive range of connections stakeholders?	Yes – although it is not clear if feedback captured during the year was incorporated.			
8. How satisfied are you with the DNO's overall performance?	very unsatisfied	not satisfied	satisfied	very satisfied
			Y	
9. General feedback	<p>There was a clear programme for stakeholder engagement and a range of practical improvements seem to have been implemented in a timely manner. WPD has a very granular plan and captures detailed stakeholder feedback.</p> <p>As for all the DNOs more still needs to be done to get DG connected and for GB to meet its aspirations in respect of a smarter energy system.</p>			

Section 2: Looking Forward plans 2018/19

We want your views on what the DNO aims to achieve in the coming year

10. Are you satisfied that the DNO has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	Yes. There are good mechanisms for engaging with connection stakeholders and with continued use of Connection Customer Steering Group. We'd welcome more opportunities for stakeholders to join discussions online e.g. through webinars.
11. 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 licensee provided reasonable and well-justified	<p>Yes broadly, but we are missing activities to make more capacity available to distributed generation.</p> <p>As general feedback from reviewing all the DNO plans, we want to see the DNOs freeing up capacity for connections by using the new technologies that have been trialled under innovation programmes.</p>

reasons? What other activities should the DNOs do?	<p>In the 'Transition to DSO' section the most important activities for us are those preparing WPD for the market-based procurement of flexibility which can be used for smarter network management. The section could even be renamed 'Procurement of flexibility as an alternative to reinforcement'! DSO strategy itself is not as important to new connections, but this seems to be recorded as a customer priority.</p> <p>There are a lot of good points captured in the stakeholder feedback report from the November 2017 Distributed Generation workshop and we are not sure all these would be covered by the Forward Plan.</p>
12. Do you consider that the DNO has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?	Yes – to an extent as a lot of the outputs are qualitative, but the KPI is just 'positive feedback'.
13. Would you agree that the DNO 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 licensee provided robust evidence that it has pursued this?	Yes - informed by, endorsed is too strong given this will be the first time many stakeholders have seen the forward plan. However, we can see from the CCSG minutes that there is an ongoing feedback process.

Annex 1 - Consultation on the Incentive of Connections Engagement (ICE)

- 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. The questions we have asked are directly linked to the minimum criteria set out in the ICE guidance document. You can find this on our website.
- 1.3. If you have any questions on this document please contact:

ICE Team
Ofgem, 10 South Colonnade, Canary Wharf, E14 4PU
0207 901 7000
Connections@Ofgem.gov.uk

- 1.4. **Responses should be sent by e-mail by 20 July 2018 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 clear 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 above.
- 1.9. Please ensure that you **indicate the DNO or specific licence area** to which your experiences relate. You can refer to annex 2 for a map of the DNO's licence areas. Please note, Northern Ireland is not subject to this consultation.
- 1.10. 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.
- 1.11. Please make sure you highlight which year a specific event happened in. The regulatory year runs from 1 April to 31 March**

Annex 2 – DNO's Licence Areas Map and List



ELECTRICITY DISTRIBUTION NETWORKS

- Scottish & Southern Electricity Networks
 - SP Energy Networks
 - Electricity North West
 - Northern Powergrid
 - UK Power Networks
 - Western Power Distribution
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	Distribution network owner	Distribution network operator
1.	Electricity North West Limited	Electricity North West Limited
2.	Northern Powergrid	Northern Powergrid (Northeast) Limited
		Northern Powergrid (Yorkshire) plc
3.	Western Power Distribution	Western Power Distribution (West Midlands) plc
		Western Power Distribution (East Midlands) plc
		Western Power Distribution (South Wales) plc
		Western Power Distribution (South West)
4.	UK Power Networks	London Power Networks plc
		South Eastern Power Networks
		Eastern Power Networks plc
5.	SP Energy Networks	SP Distribution plc
		SP Manweb plc
6.	Scottish & Southern Electricity Networks	Scottish Hydro Electric Power Distribution plc
		Southern Electric Power Distribution plc