

## Response template – Incentive on Connections Engagement

Question	Response																								
<b>About you and your work</b>																									
1. What is the name of your company?	Quintas Energy																								
2. Which DNO's ICE submission is your response related to?  <b>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.</b>  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  Our comments refer to the DNO 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>Type of connection</th><th>Total number of connections</th><th>Total MVA of connections</th></tr> </thead> <tbody> <tr> <td rowspan="4"><b>Metered Demand Connections</b></td><td>Low Voltage (LV) Work</td><td></td></tr> <tr> <td>High Voltage (HV) Work</td><td></td></tr> <tr> <td>HV and Extra High Voltage (EHV) Work</td><td></td></tr> <tr> <td>EHV work and above</td><td></td></tr> <tr> <td rowspan="2"><b>Metered Distributed Generation (DG)</b></td><td>LV work</td><td>41</td></tr> <tr> <td>HV and EHV work</td><td>95</td></tr> <tr> <td rowspan="3"><b>Unmetered Connections</b></td><td>Local Authority (LA) work</td><td></td></tr> <tr> <td>Private finance initiatives (PFI) Work</td><td></td></tr> <tr> <td>Other work</td><td></td></tr> </tbody> </table>	Type of connection	Total number of connections	Total MVA of connections	<b>Metered Demand Connections</b>	Low Voltage (LV) Work		High Voltage (HV) Work		HV and Extra High Voltage (EHV) Work		EHV work and above		<b>Metered Distributed Generation (DG)</b>	LV work	41	HV and EHV work	95	<b>Unmetered Connections</b>	Local Authority (LA) work		Private finance initiatives (PFI) Work		Other work	
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<b>Consultation questions</b>								
<b>Section 1: Looking Back report 2017/18</b>								
<b>We want your views on how well the DNOs have performed over the last regulatory year</b>								
<b>Your engagement with the DNO</b>								
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 <b>a)</b> What did the DNO do? <b>b)</b> How did the DNO do it <b>c)</b> Did the DNO have a robust engagement strategy?	<p>In 2017, Quintas Energy took a lead in the Solar Trade Association's DNO workgroup and with both the support of the association and a compelling dataset of network constraints and their effect in PV generators it was possible to gain the attention of the main DNOs, including WPD.</p> <p>In a series of meetings, it was demonstrated to WPD that PV generators were now taking network constraints much more seriously and that despite the non-firm agreements that were in place across almost all the PV plants, the generators intended to test the reasonableness of WPD decision-making related to grid outages. WPD shared an obvious concern about appearing to be unreasonable in front of the regulator or to be below the level of their peers in terms of dealing with stakeholders. Over time, it was possible to reach a consensus with WPD on the following points:</p> <p>- WPD must improve the quality of their communications. Notifications of disconnection or curtailment would have to be logged and qualified correctly</p>							

	<p>so that generators would have an opportunity to consider legitimate mitigation options.</p> <ul style="list-style-type: none"> <li>- Where incidents exceed a threshold of production losses, WPD would be obliged to consider mitigation strategies and accept any where their own obligations could be fulfilled.</li> <li>- WPD were to find a way with the generators to share information, without any breach of confidentiality, that allowed multiple stakeholders to be aware of, and act upon, opportunities for improvement of grid infrastructure.</li> <li>- WPD and the generators, acting through the Solar Trade Association, would draft and approve a Best Industry Practice Manual (BIPM) so that both sides could rely on it to guide us through potential disputes or varying criteria across the country.</li> </ul> <p>Version 1.0 of the BIPM for Management of network constraints on solar PV generation was published in June 2018 with the engagement of WPD.</p> <p>Based on this engagement, WPD has been working on the improvement of network constraint notifications, with the development of WPD Generation Portal providing updated information on network constraints and engaging generators at a higher standard than other DNOs. Based on the above, it can be confirmed that WPD has had a robust engagement strategy with PV generators in the last year.</p>
<b>The DNO's work plan</b>	
<p>4. <b>Objectives:</b> Have you seen the DNOs work plans?</p> <p><b>a)</b> Does it take into consideration your needs? If so, how?</p>	<p>With the development of the WPD Generation Portal, the availability of information on work plans has increased. The planned outages section of the portal provides an overview of network constraints for the whole year and WPD delivers Year Ahead Plan and Monthly Plan.</p>

<p><b>b)</b> If it doesn't please explain why</p>	<p>However, most network constraints are neither included in the Year Ahead Plan nor registered in the portal until a few weeks before they actually take place. This lack of timely information makes it difficult to get an idea of the effect of network constraints on PV generators for the whole year. Due to this, PV generator owners have difficulties in considering the effect of network constraints in financial models, which are usually approved for the whole year. The list of disclosed planned network constraints can change, and additional constraints are added throughout the year, leaving PV generator planification difficult.</p> <p>The Monthly Plan is more comprehensive than the Year Ahead Plan, but it does not always include all network constraints affecting generators.</p> <p>Generally speaking, WPD work plans do not seem to take PV generator needs into consideration. Network constraints are planned internally by WPD and generators are not engaged in the planning process. In some particular cases, generator needs have been taken into account when modifying the duration of some approved works.</p>
<p>5. <b>Actions:</b> Do you think the DNO has delivered its work plan?  <b>a)</b> How has the DNO done this?  <b>b)</b> If you do not think the DNO has delivered its work plan, please explain why</p>	<p>Network constraints and work plan are notified via the Year Ahead Plan, the Monthly Plan, the Generation Portal and individual emails.</p> <p>Most network constraints are only registered in the portal a few weeks before they actually take place. The Monthly Plan is more comprehensive than the Year Ahead Plan, but it does not always include all network constraints affecting generators.</p> <p>Anyway, the Generation Portal is very useful to manage information on network constraints and work plan. Whenever additional details are requested, they are sent punctually.</p>

	Work plan does not provide much detail apart from the constraint start and end date and the reason for the constraint. Additional details on the works performed would be useful to better understand how reasonable the constraint is.
6. <b>Outputs:</b> Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why	The main output is the actual vs planned duration of the network constraint. Actual constraint duration is usually shorter than planned. It might be the case that additional time is planned for constraints to ensure actual works are fixed in the planned constraint duration.
<b>Your feedback on performance</b>	
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?	<p>WPD strategy, activities and outputs have taken into account ongoing feedback from PV generators. WPD has engaged with the Solar Trade Association's DNO workgroup to approve Version 1.0 of the BIPM for network constraints on solar PV generation. This marks an important step toward improved cooperation between WPD and PV generators.</p> <p>WPD has improved outages visibility and communication processes with the PV generators. Over time, it was possible to improve the following points in communication with WPD:</p> <ul style="list-style-type: none"> <li>- WPD is giving asset owners more advance notice of network constraints, including outages that are proposed and planned but not approved.</li> <li>- Communication of planned and unplanned constraints more consistent. Further details on the constraint reasons are provided in some cases.</li> <li>- Reasons for the constraints are more consistently categorised and communicated.</li> </ul> <p>However, there are some other points that need further improvement and on which WPD is not being very proactive:</p> <ul style="list-style-type: none"> <li>- Communication about options to minimise the effects of generation constraints.</li> </ul>

	- Communication of information about WPD network security and areas with more faults. - Network alterations to minimise constraints for specific PV sites.			
8. How satisfied are you with the DNO's overall performance?	very unsatisfied	not satisfied	satisfied	very satisfied
			**	
9. General feedback				

## 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?	WPD have detailed a wide range of ways in which to engage with stakeholders which facilitate joint discussions. This is something that we appreciate as it shows cooperation between both parties is welcome.
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	Solar Trade Association's DNO workgroup is the preferred forum to engage with WPD and the Best Industry Practice Manual is the framework for continuous improvement.
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 reasons? What other activities should the DNOs do?	<p>WPD have numerous activities planned for the upcoming year some of which are of interest to Quintas Energy. These activities include DGOO forum, CCSG Workshop, WPD DG Connections Workshop and WPD Stakeholder Workshops. These activities will be of great use to us in understanding what improvements are being made to the way in which we work together. Again, Solar Trade Association's DNO workgroup is the preferred forum to engage with WPD and the Best Industry Practice Manual is the framework for continuous improvement.</p> <p>There are some other points that need further improvement which are not considered in the work plan of activities:</p> <ul style="list-style-type: none"> <li>- Communication about options to minimise the effects of generation constraints.</li> <li>- Communication of information about WPD network security and areas with more faults.</li> <li>- Network alterations to minimise constraints for specific PV sites.</li> </ul>
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.)?	We have not been provided with a list of relevant outputs that will be delivered during the regulatory year. We would expect WPD to provide some key performance indicators showing their performance with respect to PV generators. They should be related to network constraints and their effect on PV generators.
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?	WPD has proposed strategies and activities but they have not fully informed PV generators. These plans are available in their website, but notification to PV generators would have been much appreciated.

## **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](mailto: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](http://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

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- 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