

## Response template – Incentive on Connections Engagement

Question	Response																								
<b>About you and your work</b>																									
1. What is the name of your company?	AMP Energy Services Ltd																								
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.	UK Power Networks																								
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></td></tr> <tr> <td>HV and EHV work</td><td>2 24</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		HV and EHV work	2 24	<b>Unmetered Connections</b>	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
							x	
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
						x		
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>UKPN's looking back gives what appears to us to be an accurate account of what, when and how they engaged with DG connection customers.</p> <p>We would concur that UKPN did not shy away from engaging with DG connection customers but, as in previous years, we were frustrated that there seemed to be a tendency to place a greater emphasis on delivering the engagement process rather than the actions that would improve our customer experience.</p>							

#### The DNO's work plan

4. <b>Objectives:</b> Have you seen the DNOs work plans? a) Does it take into consideration your needs? If so, how? b) If it doesn't please explain why	We are familiar with UKPN's 2017/18 work plan. With 45 initiatives the plan covered a lot of ground and addressed a lot of topics that had been raised by stakeholders. However, the initiatives were almost all of a tactical nature and as such the plan was lacking in strategic focus.							
5. <b>Actions:</b> Do you think the DNO has delivered its work plan? a) How has the DNO done this?	In their looking back report UKPN say that they have completed all 45 of the initiatives. However, whilst it is clearly demonstrable that much work was done and we have no reason to challenge whether specific actions were							

b) If you do not think the DNO has delivered its work plan, please explain why	completed, we are rather concerned that the bigger picture was not addressed and I don't necessarily feel that the way in which I engage with UKPN has been significantly improved by what has been done.			
6. <b>Outputs:</b> Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why	In order to be meaningful the KPI's needed to say what the base level was. For instance if the KPI was "80% of quotes generated within 5 days of the site visit" what was the previous figure?			
Your feedback on performance				
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?	To a degree but on balance not sufficiently. On one key area, namely the poor quality of their network mapping, UKPN has not taken into account the ongoing feedback from stakeholders that this simply has to be improved. We just keep being told it will cost too much but his is becoming increasingly untenable as we have now first-hand experience of UKPN's poor network information resulting in them being in breach of their licence conditions. (See answer 9.)			
8. How satisfied are you with the DNO's overall performance?	very unsatisfied	not satisfied	satisfied	very satisfied
		x		
9. General feedback	<p>UKPN have done a lot of engagement with DG Customers and a lot of work has been done to assist developers of DG. However, the high demand for capacity in their licence areas and the advent of upfront A&amp;D fees means that it is now imperative that they make significantly more network information available and invest in ensuring that this information is kept up to date.</p> <p>Specific examples of issues we have are as follows:</p> <ol style="list-style-type: none"><li>1. It is still too difficult to a.) collate information in respect to the location and capacity of existing electrical infrastructure and b.) have a timely and meaningful conversation with the system planners to validate the information and ascertain the latest situation.</li><li>2. It has also become clear this year that the woeful standard of UKPN's network infrastructure mapping is not just a problem to us but also to their own system planners. On one site we had the poor quality of the</li></ol>			

	<p>network information available to the system planner resulted in them giving us a point of connection that was not the lowest cost scheme. This only came to light when we challenged this and demanded a meeting to review what was being offered.</p> <ol style="list-style-type: none"> <li>3. We are also concerned that there is not a consistency of process (across UKPN licence areas and among planners within a licence area) when it comes to how the point of connection that will give the customer the lowest cost scheme is determined.</li> <li>4. There is no information published on the GSP's that serve UKPN and this is a major omission. Other DNO's publish Appendix G's and carry out bulk Request for Statement of Works on a regular basis.</li> <li>5. The Connection Offers that UKPN produce are over-simplified and lacking in detail when it comes to the technical aspects and work breakdowns associated with HV/EHV connections. POC maps issued with connections are also insufficiently detailed. Also whilst we have asked repeatedly for 'Modification Offers' to be a distinct class of Offer (as opposed to New Connection Offers) and tailored accordingly our understanding is that these are still not available.</li> <li>6. The introduction of a Project Manager as an interface between the system planners does not seem to be of any benefit to us as Customers, instead it just adds another layer of bureaucracy (we chase the project manager for answers to our queries and they in turn chase the planner and it all takes too long to go up and down the chain)</li> </ol> <p>PLEASE NOTE, WE ARE OF THE OPINION THAT DUE TO THE WAY ICE IS STRUCTURED IT IS, ON THE WHOLE, NOT SUCCEEDING IN DRIVING MEANINGFUL, IN DEPTH POLICY AND/OR BEHAVIOURAL CHANGES</p>
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## 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?	<p>UKPN is consistently good at facilitating engagement with customers and we have no reason to doubt that they will continue to do so.</p> <p>However, the volume of the engagement does not necessarily translate into the quality of the outcomes delivered. As mentioned above we feel that the way ICE is structured is partly to blame for this.</p>
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>UKPN once again has a detailed plan of activities for the coming year and it is good to see that a strategic overview to the individual actions/initiatives has been added.</p> <p>There does however still seem a tendency to focus the individual actions/initiatives on the low-hanging fruit rather than some of the thornier issues such as a.) fit for purpose network mapping, b.) consistency of data and regular updating, c.) timely and meaningful opportunity to discuss feasibility of new connections and d.) a connection application/offer process that really delivers on customers' needs rather than just meeting the licence condition</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.)?	<p>The only KPI's in the plan are associated with customers satisfaction at workshops/forums.</p> <p>One KPI we would have liked to see is a commitment to reduce the time it takes to issue connection offers</p>
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?	<p>At various engagement events at which the new ICE plan was discussed we were given the opportunity to say what of the actions/initiatives proposed that we felt should be prioritised. The trouble is where there is subjectivity –</p>

If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?	for instance, what I fear that what I see as being “enhancements to the DG Mapping tool” (2.18) would go way further than what UKPN have in mind.
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## 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