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CC:

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To Whom It May Concern:

***RE: Incentive on Connections Engagement Consultation on the distribution network operators' 2018 submissions***

Thank you for the opportunity to provide comment on the DNOs' record of engagement with their connections stakeholders. As the voice of the UK solar industry, the Solar Trade Association (STA) is proud to serve over 130 member companies, representing each step of the distributed renewable power generation value chain.

A number of our large-scale PV developer members have raised recommendations as to what the DNOs should be doing to improve their connections service, both in terms of meeting the needs of distributed generation (DG) customers, and improving the experience of customers connecting when the network is constrained. The purpose of this letter is to supplement these members' individual submissions regarding specific experiences in engaging with DNOs by providing general comments and information on our organisation's and industry's collaboration with the DNOs, as well as general recommendations for improving the distribution network connection framework.

***Transparency and accountability***

We strongly support each of the recommendations outlined by Ofgem in the Open letter consultation on the Incentive on Connections Engagement: Looking Back Reports 2017-18 and Looking Forward Reports 2018-19. In fact, we raised almost all of these very same recommendations in our letter of 22 May on Assessment and Design (A&D) fees, a copy of which is attached.

In our view, providing greater transparency, both with regard to the costing methodology used for calculating A&D fees, as well in terms of local conditions and availability of alternatives when a network connection application is rejected, would be a significant step forward for our sector and for ongoing development of the low-carbon, smart energy system.

### ***Communication***

Generally speaking, we are supportive of the DNOs that have comprehensive plans for engaging with connection stakeholders and facilitating joint discussions where appropriate, but we feel there is room for improvement in the implementation of these plans.

Some of our members and stakeholders have expressed disappointment with the lack of meaningful communication and engagement taking place within officially designated fora for DG customers, and the lack of alternative venues or channels for expressing their concerns. Our members and stakeholders have also reported great inconsistencies within the same DNO in terms of both the quality of customer service and effectiveness of communication, as well as the information received, suggesting that some representatives may not be properly trained. Given the complexity and specificity of these queries, it is obviously vital that information be relayed in a consistent and precise manner.

A particular example that has been raised concerns the DNO requirement of export limiters on some projects. Across the industry there are cases of network operators exercising control over both the size of commercial installations and the size of the export limiter requested, within the same project. The STA considers it reasonable that when export limiters are fitted to projects, investors should be able to determine the size of the installation when consuming that power onsite. Furthermore, cases are occurring whereby projects that include an export limiter on their installation are still being prevented from connecting to the grid. This treatment of projects (which are likely installing for the benefits self-consumption) is both inconsistently applied and completely negates the primary function of the export limiter. It is important that practices such as these are highlighted, clarified and standardised across network operators.

### ***Forward Planning***

We generally agree that the DNOs have a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders. However, we would strongly recommend that these work plans be better communicated and that more advance notice be provided to implicated generation customers.

This year our organisation, in collaboration with Western Power Distribution and UK Power Networks, led the development of an industry-first Best Industry Practice Manual on Management of Network Constraints on Solar PV Generation, which puts forward a detailed framework for advance notification of network constraints due to planned and unplanned network maintenance and repair activities, including an extensive glossary to ensure that the same terminology is being used by both generation customers and DNO staff.

The guide also includes real-world case studies, illustrating the important benefits of advance notification in enabling generators and DNOs to work together to avoid curtailment of solar PV during peak generation periods.

With regard to the DNOs' key performance indicators and targets, we would like to see measurable actions undertaken to avoid renewable DG curtailment added as an indicator. We feel that our Best Industry Practice Manual presents a useful starting point for developing such an indicator, and would welcome the opportunity to collaborate with Ofgem, the DNOs and relevant stakeholders in its development. We would also be very willing to work with DNOs to develop a similar best practice manual for working with generators and developers over new connections.

Thank you for your consideration of these recommendations. We enclose for your reference a copy of our newly released Best Industry Practice Manual on Management of Network Constraints on Solar PV Generation, and would be grateful for your feedback and participation in developing forthcoming editions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Hewett'.

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