

## Response template – Incentive on Connections Engagement

Question	Response
About you and your work	
1. What is the name of your company?	Lightsource BP Renewable Energy Investments Limited
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.	Scottish and Southern Electricity Networks (SSEN)
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?	




**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							
	none	1	2	3	4	5	6	>6
1. How many DNO stakeholder engagement events have you been invited to this year? (This can include engagement outside official events)								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>SSEN has mailing lists for communicating with stakeholders but, in comparison to other DNOs, does not make use of these as much as it could. Our last communication from SSEN's stakeholder mailing lists was in March of this year.</p> <p>Lightsource BP attended the Distributed Energy Resources (DER) Customer Forums hosted this year by SSEN but has otherwise had limited engagement with SSEN in the past year.</p>							



The DNO's work plan	
<p>4. <b>Objectives:</b> Have you seen the DNOs work plans?</p> <p>a) Does it take into consideration your needs? If so, how?</p> <p>b) If it doesn't please explain why</p>	<p>The SSEN work plan was comprehensive and addressed some of our key concerns from previous years. We consider the following actions to be particularly relevant to our business;</p> <ul style="list-style-type: none"> <li>- Make quotations easier to understand and quicker to issue</li> <li>- Transformation of the wayleave process</li> <li>- Work with National Grid and SHETL to develop a SOW process</li> <li>- Make the standard connection offer easier to read and understand</li> <li>- Update and improve the GIS system</li> <li>- Open flexible connections to all customers</li> <li>- Improve the guidance on design approval</li> <li>- Collaborate with other DNOs and National Grid to address constraints</li> </ul> <p>One area not addressed by the work plan was post-connection modifications, i.e. the handling of applications to alter the characteristics of an existing connection. We have been making a number of these applications – some for adding storage to existing solar PV sites and others for adding solar PV 'behind the meter' at an existing large energy user (airports, factories, water treatment facilities, etc.) – and we have typically found that the systems DNOs have in place do not differentiate between these 'modification applications' and applications for brand new connections. This extends to the connection offers that come back – these need to be tailored 'modification offers' rather than offers for a new connection.</p> <p>It would appear most targets have been met but, from our experience, the quotations/connection offers need further work. SSEN's connection offers are still by far the longest documents issued by the DNOs and are still lacking a line-by-line cost breakdown for the non-contestable and contestable works.</p>
<p>5. <b>Actions:</b> 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>	

	We are particularly interested to hear about the progress made to date on the new GIS system but understand this was initially touted as a 24-month target for delivery in the following regulatory year. We look forward to more information and the access requirements being communicated to us.								
6. <b>Outputs:</b> Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why	The commitments in the Workplan were relevant and quantifiable. A few of the actions were tenuous as 'standalone' actions, such as a 'share information of connected flexible connection'.								
<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?	Yes; most notably the introduction of the DG Owner Operator Forum and the new internal Statement of Works Team are testament to how WPD listen to stakeholders and act on feedback.								
8. How satisfied are you with the DNO's overall performance?	<table><tr><td>very unsatisfied</td><td>not satisfied</td><td>satisfied</td><td>very satisfied</td></tr><tr><td></td><td>X</td><td></td><td></td></tr></table>	very unsatisfied	not satisfied	satisfied	very satisfied		X		
very unsatisfied	not satisfied	satisfied	very satisfied						
	X								
9. General feedback	<p>Our biggest issue with SSEN has been their handling of applications both for new connections and 'behind the meter' schemes. Over the last regulatory period, SSEN has started to ask for 'over and above' information and taken an extremely pedantic approach to reviewing the information which we provide them. One application we submitted was rejected because our single line diagram stated the size of the generator in 'MVA', not 'MW'; considering MVA and MW are interchangeable at unity power factor, we did not feel this was sufficient grounds to reject an application but could not find the appropriate escalation channels within SSEN to take the matter further.</p> <p>The way SSEN has handled 'behind the meter' applications was particularly poor. SSEN does not seem to have understood our requests and insisted on information we felt was not relevant. We believe the problem to be that SSEN's engineers are not accessible and that applications are first processed by 'Major Connections Contracts' personnel who do not seem to understand our requirements. While the escalation routes for post-Connection Offer</p>								



	<p>matters are published, we have had trouble escalating issued at the application stage to the appropriate person(s).</p> <p>A common theme with all DNOs is that the systems in place for processing new connections are being applied to modification applications for 'behind the meter' connections, where they are not fit for purpose.</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?	Yes, although we would like to receive more updates from SSEN regarding upcoming events and policy changes. We have not had much correspondence from SSEN over the past 4 months.
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.</p> <p>We believe all DNOs should focus on putting systems in place to handle applications for modifying the characteristics of existing connections. SSEN currently does not differentiate between 'modification applications' and applications for new connections. This extends to the connection offers that</p>

reasons? What other activities should the DNOs do?	<p>come back, which are issued in the 'new connection' template. We hope that SSEN's target to improve their generation quote letters addresses this issue but, unfortunately, the target and KPI make no mention of 'modification applications' or 'behind the meter' connection requests.</p> <p>With the introduction of upfront fees for submitting connection applications, we feel DNOs should justify the charges for their various services, including Budget Estimates, Feasibility Studies and 'Assessment &amp; Design Fees' for formal connection offers. We would have liked to see targets in SSEN's Looking Forward Report around publishing this information, so stakeholders can make informed decisions for choosing the appropriate application. We would like to see a cost breakdown as to what our money buys us, e.g. what level of network assessment does the DNO conduct for a Feasibility Study versus the 'Assessment &amp; Design' for a formal connection application?</p> <p>A quick look at SSEN's heat map shows most of their South district is heavily constrained for new connections. We would like to see a commitment in their Looking Forward Workplan to address capacity issues and create opportunities for new generation connections.</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.)?	The targets are mainly quantifiable and relevant.
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?	SSEN appears to have engaged a broad range of stakeholders in producing its Workplan for 2018/19.



## **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

