

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.	UK Power Networks (UKPN) 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>UKPN holds a good number of surgeries, including surgeries specifically for Distributed Energy Resources, across its regions. There is a DER Customer Forum and workshops on specific topics are advertised online. Materials are uploaded to the website afterwards.</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 UKPN has a logical and robust approach to engagement.</p> <p>UKPN engaged an independent assurance provider to provide an independent check that its engagement strategy was robust – this included carrying out interviews with stakeholders.</p>							

The DNO's work plan

<p>4. Objectives: 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>Yes.</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 (including pre-application support), encouraging electricity storage connections (including where customers add storage to existing sites), 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>b) As with the other DNOs, 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>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. UKPN is doing some positive work in this area – in August 2017 it launched Flexibility Services Expression of Interest and a number of initiatives on flexibility services in its 2018-19 plan.</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. There are some nice granular targets, although there is limited information on how connection customers rate the success/quality of the delivered target.</p> <p>Overall business customer satisfaction scores are reported monthly, but we are not clear from the report if this captures DG/DER or other connection customers.</p>
<p>6. Outputs: Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why</p>	<p>Yes – for the purpose of ICE.</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 (as with other DNOs) it is not clear if feedback captured during the year is incorporated. UKPN's independent assurance report suggested that it did not – or at least new suggestions could not be prioritised – and recommends adding some flexibility to the current approach. This is something all DNOs could improve on.			
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.</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> <p>The DER Customer Forum looks like a useful event.</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. 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	<p>Yes.</p> <p>UKPN shows how it prioritised initiatives to support DER connections in 2018/19. The top 2 items "Deliver improvements to the DG mapping tool" and "Publish a flexibility roadmap identifying the locations where flexibility</p>

provided reasonable and well-justified reasons? What other activities should the DNOs do?	<p>services might be required” are very much in line with our needs and what we hear from peers.</p> <p>The item ranked #3 talks about accelerating the roll-out of FDG/Active Network Management. As we have mentioned above, we have concerns about DNOs using this as a business-as-usual tool and would prefer DNOs to use flexibility services procured from competitive markets.</p> <p>In general, we welcome the fact that the UKPN Looking Forward plan focusses on improving the connections process.</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.
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 – it was useful to see the ranking 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