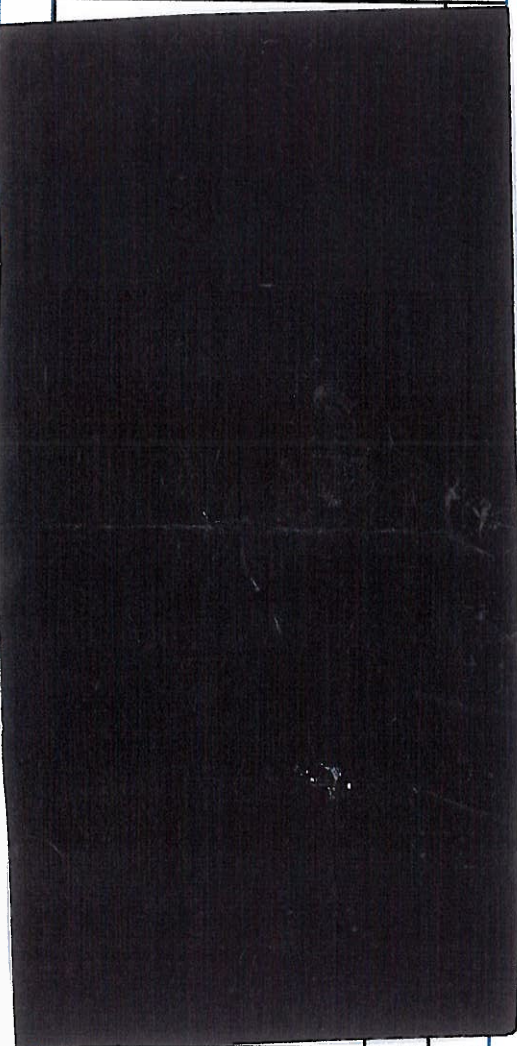


Response template – Incentive on Connections Engagement

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? 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.	<p>Northern Powergrid</p> <ul style="list-style-type: none"> - Northern Powergrid (Northeast) Limited - Northern Powergrid (Yorkshire) PLC
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								
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?	NPG sent out regular e-mails with details of events, webinars and policy updates. Some events were held in London which is useful.							
The DNO's work plan								
4. Objectives: 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 had very low-level engagement with NPG during the licence period 2017/18 so did not take this into consideration. Our engagement has increased somewhat for 2018/19.							
5. Actions: Do you think the DNO has delivered its work plan? a) How has the DNO done this? b) If you do not think the DNO has delivered its work plan, please explain why	As above.							

6. Outputs: Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why	As above.			
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?	As above.			
8. How satisfied are you with the DNO's overall performance?	very unsatisfied	not satisfied	satisfied	very satisfied
9. General feedback		X		
<p>This is based on experience during the 2018/19 licence period. NPG are generally held up as one of the poorer DNOs in the industry. We had a large portfolio of modification applications in the NE licence area. As is common across all licence areas, there is not a streamlined process for dealing with "behind the meter" schemes.</p> <p>The levels of service varied greatly across the engineers. Some turned their applications around very quickly with good levels of engagement and excellent pre-application feedback. However, this was not the norm. Others were hard to get hold of and did not respond to enquiries with no engagement for months until the offer was issued. Some missed their statutory deadlines of 65 working days. Being told that there was "no export capacity, so we will cancel the application" was commonplace. The licence holder is mandated to provide the cheapest connection offer, detailing any reinforcement that may be needed and leave it up to the applicant to make the economic decision. It was apparent that NPG were sometimes making this decision on our behalf and were reticent to provide information on constraints and reinforcement up front to aid our decision. In some cases we had to ask NPG to perform studies to assess reinforcement costs that they should have performed anyway on application. Other engineers put our schemes on "hold" and were slow to act when being asked to take schemes off hold, this was coupled with poor communication as to the new statutory</p>				

	<p>offer date. There were also instances of engineers telling us that it would look favourable if we cancelled down applications. NPG appear to be strait-jacketed by poor admin systems that do not allow multiple offers (zero export and export) to be issued on the same offer. This can be improved by introducing modification application procedures. These admin systems appear to be adding to the workload of engineers, causing them to take the above decisions. Poor administration also resulted in conflicting messages and crossed e-mails between engineers, us and the admin teams. Engineers were also re-assigned on our projects without notification.</p> <p>Pre-application support has been good, however, with conference calls and phone calls possible to arrange. The mapping tool provides a good amount of information as to network capacity, but could be improved to show all assets.</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, it appears that NPG have regular engagement sessions and events. It is possible to access engineers for conversations but the level of service can differ depending who you are dealing with.
11. Do you agree that the DNO has a comprehensive work plan of activities (with	Yes, as detailed below where we have evaluated each DG specific target.

<p>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>	<p>However we were hoping to see the following:</p> <ul style="list-style-type: none"> - More specificity on pre-application information, particularly on expanding the DG mapping tool and access to engineers, especially in the era of up-front application costs. - A breakdown of costs for A&D fees and transparency on what we should expect to receive for each type of application, with firm templates and levels of service across all engineers. Particularly details on the assessments behind chargeable budget estimates etc. Any changes to be given with a month's notice. - Processes in place to streamline modification applications for "behind the meter" schemes. Lightsource BP can contribute towards this. - Policy documents on FDG processes, requirements, and technology to be published. - Introduction of a "Quote+/Gen+/Study & Offer" service.
<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>	<p>The Work Plan is very positive with lots of things we would like to see. However, many of the measures are unmeasurable – "customer feedback", "hold a review" etc. These should be assessed regularly with the results published to ensure that the very positive vision is realised, particularly on a more challenging network.</p> <p>We have reviewed each DG specific target from their ICE plan below:</p> <p>1.1 This is welcome. However the target is vague. What is being provided? We would like generation headroom, asset locations and information, LTDS/Appendix G capacity information, constraint info (thermal, voltage, P18), any planned works, supply areas, engineer contact info etc. This must be updated regularly and is imperative in the era of up-front A&D fees.</p> <p>1.2 Excellent, particularly on the kmz info. This should include all assets.</p> <p>1.3 This is very useful, the quarterly regularity is excellent. This should be used to inform outage planning and procedures (as with WPD).</p> <p>1.4 Again very welcome. Policy documents on export limitation devices and ANM technology/procedures is welcome.</p>

	<p>2.1 Very welcome. Guaranteed levels of performance/engagement should be set for the engineers.</p> <p>2.2 Good.</p> <p>2.3 This is good as it has been lacking currently. An initial introduction/engagement when it lands on the engineer's desk would be helpful. Occasionally the engineer changes so this should be notified.</p> <p>2.4 This is welcome, but information on what is taken into account should be provided.</p> <p>3.1 Good idea.</p> <p>3.2 Good idea.</p> <p>4.1 This is welcome. Reliable and definitive curtailment information should be provided, if possible compensation could be offered or financial incentives for taking up flexible connections. Perhaps a Stakeholder Event should be held to explain ANM further.</p> <p>4.2 As above. Policy documents on ANM processes and technology should be published.</p> <p>4.3 This is welcome, better communication during SoW and a move to Appendix G should be pursued. This information should be updated regularly and made available.</p> <p>6.1 Good idea. This should also be pursued for modification applications ("Behind the meter" schemes).</p> <p>6.2 As 4.1 and 4.2</p> <p>6.3 As above, financial incentives should be made available and publicised.</p>
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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 appears this was well responded to by nearly 6000 respondents.

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.**

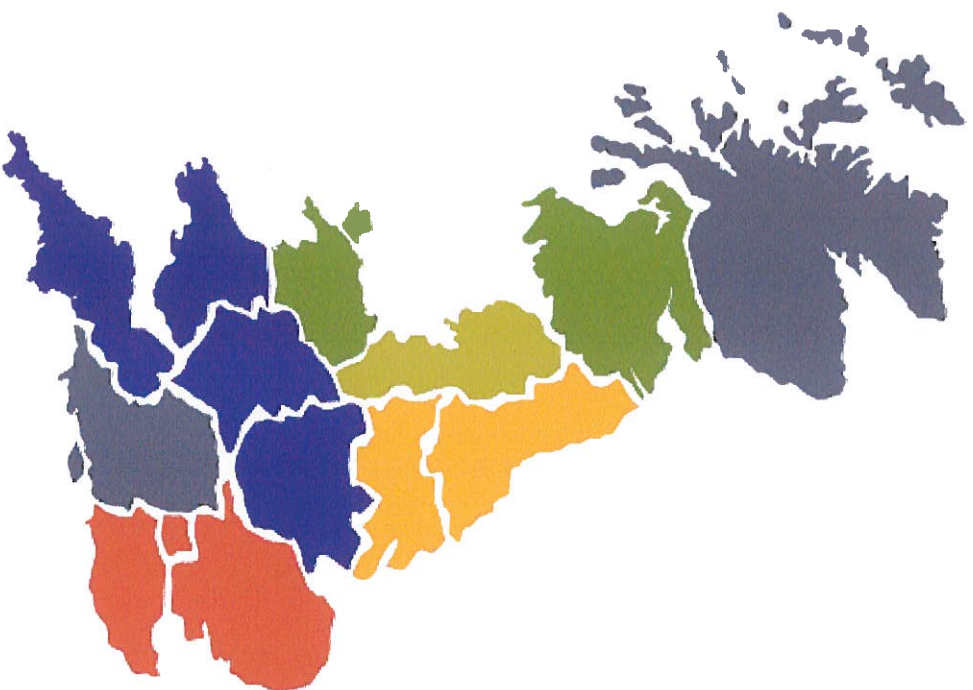
- 1.5. Unless marked confidential, all responses will be published by placing them in Ofgem's library and on its website www.ofgem.gov.uk. Respondents may request that their response is kept confidential. Ofgem shall respect this request, subject to any obligations to disclose information, for example, 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

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