

## Response template – Incentive on Connections Engagement

Question	Response																																
<b>About you and your work</b>																																	
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?  <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)  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"><b>Metered Demand Connections</b></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"><b>Metered Distributed Generation (DG)</b></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"><b>Unmetered Connections</b></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	<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	We require DG connections.		HV and EHV work	<b>Unmetered Connections</b>	Local Authority (LA) work			Private finance initiatives (PFI) Work			Other work		
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<b>Consultation questions</b>								
<b>Section 1: Looking Back report 2017/18</b>								
<b>We want your views on how well the DNOs have performed over the last regulatory year</b>								
<b>Your engagement with the DNO</b>								
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 <b>a)</b> What did the DNO do? <b>b)</b> How did the DNO do it <b>c)</b> Did the DNO have a robust engagement strategy?	<p>Centrica DE&amp;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. The ICE engagement events are easy to find on the SSEN website.</p> <p>It would be useful to have online access to material presented at engagement sessions and the stakeholder feedback recorded.</p> <p>We'd welcome more future engagement events being made available as webinars, such as the one scheduled for 6 September 2018.</p> <p>Reviewing the Looking Back report and other written material available on line suggests that SSEN has a logical and robust approach to engagement. Events that we attended in the past year have been well run.</p>							
<b>The DNO's work plan</b>								
4. <b>Objectives:</b> Have you seen the DNOs work plans?	<p>Yes.</p> <p>a) Reasonably. The 2017 work plan linked into a number of areas where we have been keen to see improvements across the DNOs e.g. better</p>							

<p><b>a)</b> Does it take into consideration your needs? If so, how?</p> <p><b>b)</b> If it doesn't please explain why</p>	<p>information provision, a clearer more streamlined Statement of Works process and other work to help Distributed Generation get a connection in constrained parts of the network.</p> <p>b) One area where it does not meet our needs is around flexible connections, in the sense that 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. On a positive note, SSEN's Constraint Managed Zones (CMZ) are a good example of a DNO embracing a market based approach.</p>
<p>5. <b>Actions:</b> Do you think the DNO has delivered its work plan?</p> <p><b>a)</b> How has the DNO done this?</p> <p><b>b)</b> If you do not think the DNO has delivered its work plan, please explain why</p>	<p>Yes – in most areas.</p> <p>a) We are largely relying on the information presented in the Looking Back report to assess this. As mentioned in Q3 SSEN engagement events are well run.</p> <p>b) Especially where the GB network operators need to be acting together to free up capacity for DG connections, progress is not as fast as it needs to be.</p>
<p>6. <b>Outputs:</b> Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why</p>	<p>Yes – reasonably and for the purpose of the incentive.</p> <p>'Collaborate with other DNOs and National Grid to address constraints' – this objective very much reflects our needs. The KPI was to hold two joint constraints workshops with SPEN and UKPN. Whilst this is useful, it does not deliver the objective. We just want to be clear in responding that a lot more needs to be done by all the network operators to help Distributed Generation connect in constrained areas.</p> <p>Several of the outputs are qualitative and the KPI is just that the output has been delivered. Whilst appropriate for this ICE review, SSEN should be open to further improvements if these are requested by stakeholders.</p>
<p><b>Your feedback on performance</b></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, reasonably so - based on the DNO's own mid-year material online and for the purposes of ICE.			
8. How satisfied are you with the DNO's overall performance?	very unsatisfied	not satisfied	satisfied	very satisfied
			Y	
9. General feedback	There was a clear programme for stakeholder engagement and a range of improvements seem to have been implemented in a timely manner. 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.			

## 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>Yes. SSEN already has good mechanisms for engaging with connection stakeholders and holding joint discussions. We'd welcome more opportunities for stakeholders to join discussions online e.g. through webinars.</p> <p>It would be good to see presentation material and feedback emerging from engagement sessions being published online.</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	<p>Yes partially, but we are missing activities to make more capacity available to distributed generation.</p> <p>There is a comprehensive work plan with delivery dates. It is useful that SSEN has presented the drivers for these commitments e.g. requests from stakeholders. Several of these stakeholder requests match our key asks e.g.</p>

provided reasonable and well-justified reasons? What other activities should the DNOs do?	<p>getting better network information and knowing where you are in the queue and how anything interactive with you impacts that. For 'Provide information on the SoW processes and Appendix G trials' we would like to see more information on what this means for each zone</p> <p>As general feedback from reviewing all the DNO plans, we want to see the DNOs freeing up capacity for connections by using the new technologies that have been trialled under innovation programmes.</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 – and where there is a qualitative element it is good to see SSEN targeting a specific customer satisfaction score.
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?	<p>Yes - informed by, endorsed is too strong given this will be the first time many stakeholders have seen the forward plan.</p> <p>In the forward plan, SSEN lists themes of feedback it is not planning to act on within ICE. For some of these it is not 100% clear why these are outside of ICE. Our only concern is that they are delivered, whether covered by ICE or not.</p>

## 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