

## Response template – Incentive on Connections Engagement

Question	Response
<b>About you and your work</b>	
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.	UK Power Networks <ul style="list-style-type: none"> <li>• South Eastern Power Networks PLC</li> <li>• Eastern Power Networks PLC</li> </ul>
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?	
<b>Consultation questions</b>	
<b>Section 1: Looking Back report 2017/18</b>	



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
1. How many DNO stakeholder engagement events have you been invited to this year? (This can include engagement outside official events)							>6
2. How many DNO Stakeholder events have you been to? This can also include meetings outside of official engagement events							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?	none	1	2	3	4	5	6
					X		
UKPN sent out regular e-mails detailing their events in the various licence areas; as well as updates on consultations and policies. The e-mails did not come from one consistent sender and were not always in the most readable format so some were overlooked. UKPN appeared to have regular customer engagement sessions in all licence areas, with facilities to attend remotely. The "Stakeholder Events" section of the website is not updated regularly, however.							
The DNO's work plan							
4. <b>Objectives:</b> 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	<p>Yes, it appears to take in most of our needs. Lightsource BP have analysed each of the targets relating to distributed generation and provided discussion in the section below.</p> <p>What is lacking is a clear strategy of how to process "modification applications", as the needs of these are more streamlined than new connections.</p> <p>In the era of up-front Assessment &amp; Design Fees, we would have expected clearer targets relating to up-front network information as well as clear information provided on how the costs are reached and what we should expect for our money. Innovative feasibility study services should be explored (like Quote+, Gen+, Study and Offer etc with other DNOs).</p>						



	<p>We would also like to see a more streamlined approach to the National Grid interface in terms of using Appendix G, which UKPN do seem to be working towards.</p> <p>A review of the interactivity process would be helpful. UKPN are currently the only DNO to curtail the acceptance period to 30 days. Interactivity is enforced on multiple mutually exclusive applications on the same site which does not seem sensible.</p> <p>A general overhaul of the website with clearer visibility of policy documents and procedures would be beneficial.</p>
<p><b>5. 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>2.17 – Yes the difference between contestable and non-contestable work is clear. However the presentation and level of detail in connection offers can vary by engineer.</p> <p>3.17 – We are not aware of the eMaps system. Not relevant to our business.</p> <p>3.18 – We are not aware of the 'How To' videos.</p> <p>7.17 – This is not relevant to our business.</p> <p>18.17 – The communication around FDG has generally been good; however we would also like to receive policy documents on the technologies and processes required for this. The implementation of flexible connections is detrimental to our business model. This provides challenges for the future as the whole industry follows suit. Connection offer expenses could be reduced for these connections to incentivise uptake.</p> <p>19.17 – A defined process for modification applications ("behind the meter" schemes), particularly zero export, should be implemented. Going through the "new connections" route is often inefficient and timely with unnecessary information requested. Change of technology and/or change of MEC could follow a similar streamlined process.</p> <p>20.17 – This consultation is welcome as sometimes the information in larger connection offers can be lacking. Detailed cost breakdowns should be provided to give confidence in the price, as well as detailed PoC info and cable routing (for contestable works). Justification for certain choices is also useful – particularly when explaining reinforcements. The level of complexity</p>

	<p>varies from engineer to engineer and more often than not we are submitting further questions on e-mail to clear up ambiguity in offers.</p> <p>21.17 – This is welcome.</p> <p>22.17 – This process looks suitable.</p> <p>24.17 – Not used</p> <p>26.17 – This is welcome, but the website is still rather “clunky” and difficult to navigate, particularly when locating policy documents, press releases or specifications.</p> <p>32.17 – This is welcome, however there is still a long way to go on improving the DG map, as we fed back at the DG mapping session. We were told it may be 10 years until the underground cable are on as the maps need to be vectorised. Can we have scans of the paper maps in the mean-time? Capacity should be updated more regularly than via the LTDS or Appendix G, as is the case with other DNOs.</p> <p>35.17 – There is still an air of ambiguity and remoteness over the SoW process. We feel that communication could be improved further with a move to full Appendix G solutions being even more welcome.</p> <p>36.17 – Good. Lightsource BP would like to maintain the ability to “self-supply”.</p> <p>42.17 – DG Mapping Tool workshop was useful with many common concerns raised. The timescales to introduce some solutions, particularly on underground lines and asset info, seemed unambitious. Particularly as this issue has been raised a few years running. UKPN’s up-front information still lags behind other DNOs and will need to be improved in the era of up-front charging as calling engineers constantly can be inefficient for all involved.</p> <p>Yes, as most have been met and are relating to specific actions. The vaguer KPIs relating to “consultations” should then be followed through to action.</p>
<p>6. <b>Outputs:</b> Were the outputs (KPIs, targets etc) in the DNO’s work plan appropriate? Please explain why</p>	
<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?	UKPN seem to take a proactive and positive view on ICE overall, with their events well attended by various stakeholders. UKPN are generally regarding as a good DNO in the industry.			
8. How satisfied are you with the DNO's overall performance?	Very unsatisfied	not satisfied	satisfied	very satisfied
9. General feedback			X	
<p>As mentioned, UKPN are generally considered to be a "good" DNO. Up-front engagement on connection applications is good, with indicative costs and works often provided by the engineer to help inform decision-making. The service and contact level can vary from engineer to engineer, as well as the layout and format of connection offers. We feel this should be standardised to provide consistency. We would like to see as much info/cost breakdown as possible, to save the need for follow-up e-mails. Justification for how costs have been arrived at is important for both connection offer expenses and applications. In the era of up-front charging, we would like to see a breakdown of "what we get for our money" in the A&amp;D fees, as well as far greater provision of network information and consistency of engineer engagement before application. Some engineers are very engaging and others are hard to get hold of. A preliminary chat before progressing with the offer is very important. This will save time and enable more efficient working on both sides. We have experienced confusion and delay when processing modification applications with the connections gateway. This has caused offers to come in at different times for the same site. Policy to guide this sort of application would be welcome, which Lightsource BP can contribute to.</p>				



## Section 2: Looking Forward plans 2018/19

### We want your views on what the DNO aims to achieve in the coming year

<p>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>	<p>Yes, UKPN hosts regular events in all its licence areas, with regular e-mails sent out and plenty of opportunities for ad hoc conversations/surgeries.</p>
<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 provided reasonable and well-justified reasons? What other activities should the DNOs do?</p>	<p>Yes, as detailed below where we have evaluated each DG specific target.</p> <p>However we were hoping to see the following:</p> <ul style="list-style-type: none"> <li>- Targets relating to pre-application information, particularly on expanding the DG mapping tool and access to engineers, especially in the era of up-front application costs. Underground line maps can be scanned in the interim.</li> <li>- A breakdown of costs for A&amp;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.</li> <li>- Consistent approach in use of application reference numbers.</li> <li>- Processes in place to streamline modification applications for "behind the meter" schemes. Lightsource BP are happy to contribute.</li> <li>- Removing the detailed technical information requirements (SLDs etc) from budget estimates.</li> <li>- A review of the up-front portion of the fees and perhaps a move to invoicing with the offer.</li> <li>- Updating of the website to make policy documents easier to find.</li> <li>- Policy documents on FDG processes, requirements, and technology to be published.</li> </ul>



<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>- Introduction of a "Quote+/Gen+/Study &amp; Offer" service.</p> <p>Yes, the targets seem achievable, here is the evaluation of these below:</p> <p>1.18 – Not relevant to our business, but we have seen lots of engagement on the topic of electric vehicles.</p> <p>2.18 – We attended a well-attended and receptive DG mapping tool session where priorities were agreed and circulated afterwards. We look forward to seeing these implemented, however we still think they could go further by showing: underground lines, 11 kV lines, service area, real-time capacity/headroom, NGET issues etc to bring into line with other DNOs. We were told that underground lines, while being raised for another year, were a long way off as the maps needed to be vectorised. We would accept scanned versions of the paper maps in the interim.</p> <p>3.18 – Not relevant to our business.</p> <p>4.18 – This is welcome. We have not been approached yet, but would appreciate transparency on how the costs are made (as they vary between DNOs) as well as prescribed deliverables, assessments and levels of service for applications so we can "see what we are paying for". Any change in the level or timing of fees must be communicated with at least a month's notice.</p> <p>5.18 – Not been a problem for our business.</p> <p>7.18 – Welcome, although a more dynamic approach to this (say weekly) would be welcome and this should be tied in with the DG mapping tool.</p> <p>8.18 – Welcome, especially if it eases the planning process.</p> <p>9.18 – As above.</p> <p>10.18 – Not affected our business.</p> <p>11.18 – This would be welcome should we ever encounter this situation.</p> <p>13.18 – This would be welcome as website in general is dated.</p> <p>14.18 – Flexible connections are not desirable to our business, but are inevitable. Financial incentives should be provided, compensation for curtailment paid and detailed, reliable curtailment information provided.</p>
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	<p>Technical documents/policy documents on the technology, equipment and processes required for an FDG connection should be published.</p> <p>15.18 – As above.</p> <p>16.18 – Welcome. Ad-hoc access to engineers via telephone or e-mail would also be useful. Perhaps publish an area map with who is responsible for what in each area? Or introduce key account managers?</p> <p>22.18 – Disconnections have not impacted our business yet.</p> <p>26.18 – As 14.18.</p> <p>27.18 – This is welcome. Similar procedures should also be applied to "modification applications" and/or zero export schemes.</p> <p>28.18 – Lightsource BP sees no reason to review this process.</p> <p>30.18 – This is useful, although it would also be needed to discount the FDG information when seeking info for a firm connection. Steadfast policies around FDG should be published.</p> <p>31.18 – Not relevant.</p>
<p>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>	<p>This was endorsed by 6 stakeholders, most of whom were independent contractors.</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

- Scottish & Southern Electricity Networks
- SP Energy Networks
- Electricity North West
- Northern Powergrid
- UK Power Networks
- Western Power Distribution

Distribution network owner	Distribution network operator
<b>1. Electricity North West Limited</b>	<b>Electricity North West Limited</b>
<b>2. Northern Powergrid</b>	Northern Powergrid (Northeast) Limited
	Northern Powergrid (Yorkshire) plc
<b>3. Western Power Distribution</b>	Western Power Distribution (West Midlands) plc
	Western Power Distribution (East Midlands) plc
	Western Power Distribution (South Wales) plc
	Western Power Distribution (South West)
<b>4. UK Power Networks</b>	London Power Networks plc
	South Eastern Power Networks
	Eastern Power Networks plc
<b>5. SP Energy Networks</b>	SP Distribution plc
	SP Manweb plc
<b>6. Scottish &amp; Southern Electricity Networks</b>	Scottish Hydro Electric Power Distribution plc
	Southern Electric Power Distribution plc

