


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.	Scottish Power Energy Networks (SPEN)
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?	

	Unmetered Connections	Limitation Scheme, due to the export capacity constraints)		
		Local Authority (LA) work		
		Private finance initiatives (PFI) Work		
		Other work		

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	SPEN has a mailing list for connections engagements and promote their events and issue invitations through this.							
a) What did the DNO do? b) How did the DNO do it c) Did the DNO have a robust engagement strategy?	SPEN has several forums tailored for different stakeholders; the forums in which Lightsource BP has participated are; the Distributed Energy Resource (DER) Customer Forum, the Connections Stakeholder Panel and the Owner Operator (OO) Forum.							

	SPEN continued to increase the volume of engagement over this period. We believe their strategy is robust and we appreciate the access to senior members of staff during the events.
The DNO's work plan	
4. <i>Objectives:</i> 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	Given SPEN decided to focus on 11 Actions/ Commitments in 2017-2018 we felt it vital that these were all relevant and targeted. We were very pleased to see the presence of Actions 9&10 with their focus on Delivery and telecoms but the 'sub-actions' behind the headline needed to be better defined. For instance, target standards of performance for getting meaningful programmes issued and ultimately the works themselves undertaken should have been included.
5. <i>Actions:</i> 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	It would appear the actions have been complete or, in the case of 9 and 10, are on their way to completion.
6. <i>Outputs:</i> Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why	We felt the KPIs lacked ambition in scope, for example, Action 8 of the plan is titled "Flexible Connections" but the detail of the action simply says, "we will publish the location of our ANM zones, together with a forward-looking plan for future zones". This does not sound like a robust strategy for meeting the needs of customers looking to connect on constrained networks.
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?	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.

	very unsatisfied	not satisfied	satisfied	very satisfied
8. How satisfied are you with the DNO's overall performance?			X	
9. General feedback				

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?	SPEN appear to have a robust strategy for continuing to engage stakeholders in 2018/19 and clearly take face-to-face customer engagement, and stakeholder events, seriously.

<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>We are disappointed to see only 13 actions in this year's Looking Forward Workplan, with some of these actions seemingly recycled from the previous year's plan (e.g. actions 8 and 12).</p> <p>We believe all DNOs should focus on putting systems in place to handle applications for modifying the characteristics of existing connections. SPEN currently does not differentiate between 'modification applications' and applications for new connections. This extends to the connection offers that come back, which are issued in the 'new connection' template. We are disappointed to see that there are no targets within SPEN's Looking Forward Plan that recognise and seek to address this.</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 & Design Fees' for formal connection offers. We would have liked to see targets in SPEN'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 & Design' for a formal connection application?</p> <p>Whilst we are pleased to see an action particularly focussed on the telecommunications trial, no actions seemingly address the cost of connections and a target to reduce this. In our experience, SPEN's connection offers are typically expensive in comparison to other DNO's and we would like to know what is being done to bring these costs down.</p>
<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>Whilst the headline targets are broad, the KPIs are generally quantifiable. However, we feel the targets are loose in places and unambitious; for example, Action 11 'Queue Management', has KPIs to 'Identify and measure capacity is being released' but no target has been set for the amount of capacity to be freed up or a % of 'slow moving' Connection Offers to be withdrawn.</p>

1.3. 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?	SPEN appears to have had endorsement for its Looking Back Workplan, but it is unclear what level of endorsement has been achieved for the 2018/19 Workplan.
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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