

Response template – Incentive on Connections Engagement

Question	Response																															
About you and your work																																
1. What is the name of your company?	Countryside Renewables (North Anglesey) Ltd																															
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.	SP Energy Networks – Manweb License Area																															
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></td><td></td></tr> <tr> <td>HV and EHV work</td><td></td><td>49.99 MVA @ 132kV</td></tr> <tr> <td rowspan="2">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> </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			HV and EHV work		49.99 MVA @ 132kV	Unmetered Connections	Local Authority (LA) work			Private finance initiatives (PFI) Work		
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		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 a) What did the DNO do? b) How did the DNO do it c) Did the DNO have a robust engagement strategy?	No stakeholder events. A series of one-on-one meetings.							
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 have seen SPEN's work plan. b) The work plan does not take into consideration our need for a cost-effective, transparent grid connection offer that considers alternative methods of connection.							
5. Actions: Do you think the DNO has delivered its work plan? a) How has the DNO done this?	We do not think SPEN has delivered on its work plan: Action 3 – Communication - Website. SPEN does not publish many of its Technical Specifications on its website, unlike the other DNOs. We are left							

<p>b) If you do not think the DNO has delivered its work plan, please explain why</p>	<p>begging SPEN to send us the Technical Specifications or guessing what they have or have not approved or might consider approving.</p> <p>Action 6 – Project Management. SPEN have not meaningfully engaged with us or our technical advisors, unlike the other DNOs.</p> <p>Action 9 – Telecoms Design and Delivery. Description: <i>"We will ensure our customers receive an approximate estimate of costs for their telecommunications solution at the design stage of their project. Once it's accepted, we'll provide even more details."</i></p> <p>In our case, SPEN have failed to adequately consider cheaper methods of achieving the same telecoms performance, e.g. fibre wrap or ADSS as significantly cheaper alternatives to extremely expensive reconductoring with OPCC, which the other DNOs have accepted.</p>
<p>6. Outputs: Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why</p>	<p>No, the 13 Action Items and KPIs in the Looking Back Report do not deliver the three stated Key Strategic Objectives of low connection cost, faster timing and customer satisfaction.</p> <p>In particular, only two of the 13 Looking Back Action Items purport to relate to reducing cost (12 Flexible Tenders, 13 Connection Offer Expenses).</p> <p>However, neither of these deliver the stated second Key Strategic Objective of delivering cheaper connections:</p> <p><i>"Our vision is to make the whole process more efficient, and deliver cheaper connections. We realise that cost can make or break a project. For larger customers, it's often a key factor in a project's viability.</i></p> <p><i>We make our costing clear and transparent by giving a comprehensive breakdown of costs in our connections offer letters. That way our customers know where they stand right at the start, and can make an informed choice.</i></p> <p><i>Customers have a clear view of what is included in the cost of their project.</i></p>

	<p><i>We are also committed to helping our customers understand more about the work we do for them. So we make a point of being clear and open in our communications.</i></p> <p><i>To help keep costs down, we're making use of new technologies wherever we can.</i></p> <p><i>Finally, the Code of Practice (CoP) has been highly successful. It has helped customers by removing barriers and ensuring they have choice in their connections provider."</i></p> <p>Our experience has been quite the opposite:</p> <p>1. Costing was not clear and transparent. We have not been given a comprehensive breakdown of costs in the connection offer letter.</p> <p>2. We have not been given a clear view of what is included in the cost of our project despite repeated requests.</p> <p>3. We have not been given an explanation of the scope of the work packages in the connection offer and do not understand why there are in the offer in spite of repeated requests. They are black boxes of scope and cost.</p> <p>Communication has been poor. We have proposed several alternative means of connection and SPEN has not meaningfully engaged with us or our advisors on why they will not accept these. They have not invited the right technical experts to be at the table when we discuss our proposed solutions. We have had to separately enquire who the expert is and then ask they review the proposed solutions.</p> <p>None of the 13 Actions addresses delivery of the second Key Strategic Objective of delivering cheaper connections.</p>
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?	No – we have tried to work with SPEN on a single EHV (132kV) connection for four years and they ignore all feedback regarding performance and engagement.

8. How satisfied are you with the DNO's overall performance?	very unsatisfied	not satisfied	satisfied	very satisfied
	X			
9. General feedback	<p>We have a grid connection of a large scale solar and battery storage project that despite trying to firm up costs SPEN insist on referring to the connection offer as 'indicative.' This is wholly unacceptable, their own Pricing and Methodology Statement clearly states that indicative pricing is reserved for the budget and feasibility stages. At the point of a confirmed offer a connecting party should be able to rely upon the offer as being accurate. We have made numerous attempts at great cost to try and understand their pricing methodology and it appears that they are attempting to obtain grid reinforcement at no cost to SPEN. They refuse to engage in a transparent manner and our independent technical advice is that this strategy is blatantly clear.</p> <p>We have successfully worked with a number of the DNOs for distributed generation connections. SPEN has been, by a wide margin, the most frustrating, time-consuming and costly for us to work with for a number of reasons:</p> <ol style="list-style-type: none"> 1. Refusal to explain or break down costs set out in the grid connection offer. We have no idea what very large line items are for and believe we are being held to ransom. 2. Refusal to meaningfully engage in considering alternative means of connection that other DNOs accept that will lower the cost of connection, e.g. the method of fibre optic communications. <p>We believe SP Energy Networks Manweb has held back the North Wales economy because of inflated grid connection offers that prevent feasible new connections from being made. If OFGEM does not do something, the SPEN will continue to hold back the North Wales economy.</p> <p>All other stakeholders we have spoken to, without exception, have had similar experiences to ours with SP Energy Networks Manweb.</p> <p>SPEN pale in comparison to other DNOs such as UK Power Networks, WPD and SSEN when it comes to attitude towards connecting customers cost effectively, approach towards new solutions to problems and approach</p>			

	<p>towards innovation. We believe it is down to the tone from the top of SPEN being wrong and in stark contrast to the other DNOs.</p> <p>Finally, there seems to be a severe shortage of expertise within SPEN Manweb compared to the other DNOs. Many of the technically experienced and knowledgeable people that have left or retired appear not to have been replaced.</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?	
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?	

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.)?	
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?	

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