

Response template – Incentive on Connections Engagement

About you and your work																																					
1. What is the name of your company?	Quintas Energy																																				
2. Is your response confidential? Please explain which parts and why. For a fair process, we prefer the DNOs to be able to respond to any comments made, particularly if they are negative. So please consider carefully before marking any part of your response confidential.'	Not confidential																																				
3. Which DNO's ICE submission is your response related to? If you wish to provide a response to the ICE submission of more than one DNO group, please use a separate template for each group.	Scottish & Southern Electricity Networks																																				
4. What type of connection do you generally require? 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" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;"></th> <th style="width: 30%;">Type of connection</th> <th style="width: 20%;">Total number of connections</th> <th style="width: 30%;">Total MVA of connections</th> </tr> </thead> <tbody> <tr> <td rowspan="4" style="text-align: center; vertical-align: middle;">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" style="text-align: center; vertical-align: middle;">Metered Distributed Generation (DG)</td> <td>LV work</td> <td></td> <td></td> </tr> <tr> <td>HV and EHV work</td> <td style="text-align: center;">41 sites</td> <td style="text-align: center;">302 MWp</td> </tr> <tr> <td rowspan="3" style="text-align: center; vertical-align: middle;">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> <tr> <td>Other 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	41 sites	302 MWp	Unmetered Connections	Local Authority (LA) work			Private finance initiatives (PFI) Work			Other work		
	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	41 sites	302 MWp																																		
Unmetered Connections	Local Authority (LA) work																																				
	Private finance initiatives (PFI) Work																																				
	Other work																																				

Section 1: Looking Back report 2018/19

We want your views on how well the DNOs have engaged with connections stakeholders over the last regulatory year

1. How many of the DNO's stakeholder engagement events have you been invited to this year? (This can include engagement outside official events.) Please tick a box.	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. Please tick a box.	none	1	2	3	4	5	6	>6
				**				
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?	<p>In 2017, Quintas Energy took a lead in the Solar Trade Association's DNO workgroup and with both the support of the association and a compelling dataset of network constraints and their effect in PV generators it was possible to gain the attention of the main DNOs, including SSE.</p> <p>In a series of meetings, it was demonstrated to SSE that PV generators were now taking network constraints much more seriously and that despite the non-firm agreements that were in place across almost all the PV plants, the generators intended to test the reasonableness of SSE decision-making related to grid outages. Although SSE was invited to these discussions, they did not share a concern about appearing to be unreasonable in front of the regulator or to be below the level of their peers in terms of dealing with stakeholders. SSE representatives attended first meetings, but it was not possible to reach a consensus with them on the following points, that were understood as reasonable by the PV generators and other DNOs:</p> <ul style="list-style-type: none"> - Improve the quality of their communications. Notifications of disconnection or curtailment would have to be logged and qualified correctly so that generators would have an opportunity to consider legitimate mitigation options. 							

	<ul style="list-style-type: none"> - Where incidents exceed a threshold of production losses, consider mitigation strategies and accept any where their own obligations could be fulfilled. - Find a way with the generators to share information, without any breach of confidentiality, that allowed multiple stakeholders to be aware of, and act upon, opportunities for improvement of grid infrastructure. - Draft and approve a Best Industry Practice Manual (BIPM) so that both sides could rely on it to guide us through potential disputes or varying criteria across the country. <p>Version 1.0 of the BIPM for Management of network constraints on solar PV generation was published in June 2018 with the engagement of other DNOs, but SSE did not accept to engage in this manual.</p> <p>This lack of engagement is clearly shown in the lack of efficient communication channels. SSE does not have a regular engagement strategy with PV generators, and this attitude remains unchanged from last year.</p>
The DNO's work plan	
<p>4. <i>Objectives:</i> Have you seen the DNOs work plans and the objectives they outline?</p> <p>a) Does it take into consideration your needs? If so, how?</p> <p>b) If it doesn't please explain why.</p>	<p>SSE has not developed any efficient communication way to deliver information on work plans and network constraints. Notifications are sent sporadically when there is an upcoming constraint in place rather than on a weekly basis as is seen in other DNOs.</p> <p>This lack of information makes impossible an idea of the effect of network constraints on PV generators for the whole year. Due to this, PV generator owners have difficulties in considering the effect of network constraints in financial models, which are usually approved for the whole year. The list of disclosed planned network constraints can change, and additional constraints are added throughout the year, leaving PV generator planification difficult.</p> <p>Information delivered on the punctual notifications is usually poor. On many occasions additional contact must be made to have some details of the work plans revealed which is often left unanswered and results in us constantly chasing for an answer.</p>

	Generally speaking, SSE work plans do not take PV generator needs into consideration. Network constraints are planned internally by SSE and generators are not engaged in the planning process.
<p>5. <i>Actions:</i> Do you think the DNO has delivered its work plan?</p> <p>a) How has the DNO done this?</p> <p>b) If you do not think the DNO has delivered its work plan, please explain why.</p>	<p>Network constraints and work plan are notified sporadically when there is an upcoming constraint in place rather than on a weekly basis as is seen in other DNOs.</p> <p>Work plan does not provide much detail apart from the constraint start and end date. Reason for the constraint is not usually disclosed. Additional details on the works performed would be useful to better understand how reasonable the constraint is.</p>
<p>6. <i>Outputs:</i> Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Did the DNO meet these outputs? Please explain why.</p>	<p>The main output is the actual vs planned duration of the network constraint. Actual constraint duration is usually shorter than planned. It might be the case that additional time is planned for constraints to ensure actual works are fixed in the planned constraint duration.</p>
<p>Your feedback on the DNOs stakeholder engagement performance</p>	
<p>7. Do you think the DNO's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders?</p>	<p>SSE strategy, activities and outputs have not taken into account ongoing feedback from PV generators. SSE has not engaged with the Solar Trade Association's DNO workgroup. In the future, it is expected that they will engage with the STA to improve the BIPM for Management of network constraints on solar PV generation.</p> <p>There are many points that need further improvement and on which SSE is not being very proactive:</p> <ul style="list-style-type: none"> - Give asset owners more advance notice of network constraints, including outages that are proposed and planned but not approved. - Communication of planned and unplanned constraints should be more consistent. - Reasons for the constraints should be consistently categorised and communicated.

	<ul style="list-style-type: none"> - Development of an efficient web portal to share punctual information on network constraints. - Communication about options to minimise the effects of generation constraints. - Communication of information about SSE network security and areas with more faults. - Network alterations to minimise constraints for specific PV sites. 			
8. How satisfied are you with the DNO's overall engagement performance?	very unsatisfied	not satisfied	satisfied	very satisfied
	**			
9. General feedback – please provide any further feedback on the DNO's 2018/19 engagement performance not covered in your responses above.	Very unsatisfied			

Section 2: Looking Forward plans 2019/20

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>SSE have detailed a wide range of ways in which to engage with stakeholders which facilitate joint discussions. This is something that we appreciate as it shows cooperation between both parties is welcome.</p> <p>Anyway, Solar Trade Association's DNO workgroup is the preferred forum to engage with SSE and the Best Industry Practice Manual should be the framework for continuous improvement.</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 DNO provided reasonable and well-justified reasons? What other activities should the DNO do?</p>	<p>SSE do have a comprehensive work plan. They will be reviewing their connections website to make it easily accessible which will be of great help to us. The provision of adding contact information and escalation processes will help us in saving time as we will now be able to directly contact the person needed.</p> <p>There are some other points that need further improvement which are not considered in the work plan of activities:</p> <ul style="list-style-type: none"> - Engagement with the Solar Trade Association's DNO workgroup and the BIPM. - Communication about options to minimise the effects of generation constraints. - Communication of information about SSE network security and areas with more faults. - Network alterations to minimise constraints for specific PV sites.
<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>We have not been provided with a list of relevant outputs that will be delivered during the regulatory year. We would expect SSE to provide some key performance indicators showing their performance with respect to PV generators. They should be related to network constraints and their effect on PV generators.</p>
<p>13. Would you agree that the DNO's proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders?</p>	<p>SSE has proposed strategies and activities, but they have not fully informed PV generators.</p>

If not, has the DNO provided robust evidence that it has pursued this engagement?	
-----------------------------------------------------------------------------------	--

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 22 July 2019 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