

## 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? <b>Please explain which parts and why.</b>  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, <b>please use a separate template for each group.</b>	Western Power Distribution																																	
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: 40%;">Type of connection</th> <th style="width: 20%;">Total number of connections</th> <th style="width: 20%;">Total MVA of connections</th> </tr> </thead> <tbody> <tr> <td rowspan="4" style="text-align: center; vertical-align: middle;"><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" style="text-align: center; vertical-align: middle;"><b>Metered Distributed Generation (DG)</b></td> <td>LV work</td> <td></td> <td></td> </tr> <tr> <td>HV and EHV work</td> <td>107 sites</td> <td>714 MWp</td> </tr> <tr> <td rowspan="2" style="text-align: center; vertical-align: middle;"><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> </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			HV and EHV work	107 sites	714 MWp	<b>Unmetered Connections</b>	Local Authority (LA) work			Private finance initiatives (PFI) Work		
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		Other work						
<b>Section 1: Looking Back report 2018/19</b>								
<b>We want your views on how well the DNOs have engaged with connections stakeholders over the last regulatory year</b>								
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: <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>During the last year, WPD has set up a number of Distribution Generation owner / operator forums. These events have provided an opportunity for WPD and distributed generation owners / operators to improve communication on issues including:</p> <ul style="list-style-type: none"> <li>- Grid constraints; and</li> <li>- Improving communication with generators on outages and constraints.</li> </ul> <p>Potential approaches for forecasting and mitigating outages have not been taken into consideration, although this is one of the points that we expect to be considered in these forums. Meeting notes and slides of the events are shared through a dedicated portal.</p> <p>There is an additional WPD Generation Portal where grid constraints are logged by WPD and notified through weekly notification emails. This portal also allows to modify generator contact details and includes details on historical constraints. WPD Generation Portal provide updated information on network constraints and engages generators at a higher standard than other DNOs. Based on the above, it can be confirmed that WPD has had a robust engagement strategy with PV generators in the last year.</p>							

### The DNO's work plan

4. *Objectives:* Have you seen the DNOs work plans and the objectives they outline?
- a)** Does it take into consideration your needs? If so, how?
- b)** If it doesn't please explain why.

With the development of the WPD Generation Portal, the availability of information on work plans has increased. The planned outages section of the portal provides an overview of network constraints for the whole year and WPD delivers Year Ahead Plan and Monthly Plan.

However, most network constraints are neither included in the Year Ahead Plan nor registered in the portal until a few weeks before they actually take place. This lack of timely information makes it difficult to get 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 significantly, and additional constraints are added throughout the year, making PV generator planning difficult. All of this considered:

- When looking at outage notifications, WPD stands out positively compared with the other DNOs we deal with.

- WPD sends us notifications about upcoming constraints on a regular basis. There are several different types of notifications, that we receive (the Year Ahead Plan, The Monthly plan (4-week outage plan), the Generation Portal and individual emails).

- You can find WPD's work plan online on its web portal. It is certainly good and could give us some more information about what we should expect. As well there exist an option "Historic Outages" which can be useful. However, it has happened that we were notified of significant outages (2 weeks and more) with only limited time before the start date, and without the outage being registered on the portal. This makes it more difficult for us to consider mitigations and information gathering. We believe this could be significantly improved.

- While this DNO has its web portal, not all outages are registered in it and sometimes the published information about certain outages is not updated even if something changes. Speaking of the web portal, there is currently no "End Date" or "Duration" column under "Historic Outages" as well as there is no information in "Historic Outages" for the 11kV sites

	<p>- It would be very helpful if the DNO could add the following information for all of its sites: "Customer's Site name" and "MPAN number".</p> <p>- We do not always receive official notification letters (with attached pdf documents with relevant information). Perhaps, the DNO could introduce a standard form for all such notifications.</p> <p>Generally speaking, WPD work plans do not seem to take PV generator needs into consideration. Network constraints are planned internally by WPD and generators are not engaged in the planning process. In some particular cases, generator needs have been taken into account when modifying the duration of some approved works.</p>
<p>5. <i>Actions:</i> 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>Network constraints and work plan are notified via the Year Ahead Plan, The Monthly plan (4-week outage plan), the Generation Portal and individual emails just as in the last year.</p> <p>Not all constraints are registered in the portal immediately, sometimes it appears kind a late. As well if there are some changes in the outage information, like changing the duration, or the permitted export capacity, or something else - the information in the Portal is not always updated in time.</p> <p>Main information that is given to us in the notifications is: start date, duration, reason (in a few words), permitted export capacity. Possibility to have more information about each outage sounds good to us - it would be useful to better understanding the need in the constraint.</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. No KPI is provided by the DNO.</p>
<p><b>Your feedback on the DNOs stakeholder engagement performance</b></p>	
<p>7. Do you think the DNO's strategy, activities and outputs have taken into account ongoing feedback from a broad and</p>	<p>WPD strategy, activities and outputs have taken into account ongoing feedback from PV generators. WPD has improved outages visibility and</p>

inclusive range of connections stakeholders?	<p>communication processes with the PV generators. Over time, it was possible to improve the following points in communication with WPD:</p> <ul style="list-style-type: none"> <li>- WPD is giving asset owners more advance notice of network constraints, including outages that are proposed and planned but not approved.</li> <li>- Communication of planned and unplanned constraints more consistent. Further details on the constraint reasons are provided in some cases.</li> <li>- Reasons for the constraints are more consistently categorised and communicated.</li> </ul> <p>However, there are some other points that need further improvement and on which WPD is not being very proactive:</p> <ul style="list-style-type: none"> <li>- Communication about options to minimise the effects of generation constraints.</li> <li>- Communication of information about WPD network security and areas with more faults.</li> <li>- Network alterations to minimise constraints for specific PV sites.</li> </ul> <p>It was a good experience with WPD to minimise the effect of some generation constraints during this year, in particular not long time ago it became possible to shorten the duration of the outage from 123-days long to 2-days long, that is pretty impressive.</p>			
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.	<p>Satisfied</p>			

## Section 2: Looking Forward plans 2019/20

### 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?

Although WPD is the DNO with the most robust engagement strategy with distribution generation owners / operators, some additional steps should be taken to improve constraints communication and planning.

- WPD has been working on the improvement of network constraint notifications with the development of WPD Generation Portal providing updated information on network constraints and engaging generators at a higher standard than other DNOs. However, it should be noted that constraints are not always logged on reasonable time so that generators would have an opportunity to consider legitimate mitigation options. Furthermore, not all constraints are always logged and qualified correctly in the WPD Generation Portal, and some notifications are directly delivered by email, without further register in the portal.

- Where incidents exceed a threshold of production losses, WPD is expected to consider and communicate mitigation strategies, accepting any where their own obligations can be fulfilled. WPD is neither calculating estimated production losses nor proposing mitigation strategies for main constraints. WPD is expected to proactively share estimated production losses and mitigation strategies with the generators for constraints exceeding a given

	<p>threshold, according to the agreed in the Best Industry Practice Manual (BIPM) approved in 2018.</p> <p>- WPD is expected 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.</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>WPD have numerous activities planned for the upcoming year some of which are of interest to Quintas Energy. These activities include DGOO forum, CCSG Workshop, WPD DG Connections Workshop and WPD Stakeholder Workshops. These activities will be of great use to us in understanding what improvements are being made to the way in which we work together. Solar Trade Association's DNO workgroup is the preferred forum to engage with WPD and the Best Industry Practice Manual is the framework for continuous improvement.</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"> <li>- Communication about options to minimise the effects of generation constraints.</li> <li>- Communication of information about WPD network security and areas with more faults.</li> <li>- Network alterations to minimise constraints for specific PV sites.</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>We have not been provided with a list of relevant outputs that will be delivered during the regulatory year. We would expect WPD 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? If not, has the DNO provided robust evidence that it has pursued this engagement?</p>	<p>WPD has proposed strategies and activities but they have not fully informed PV generators. These plans are available in their website, but notification to PV generators would have been much appreciated.</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 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](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
-

	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