

## Response template – Incentive on Connections Engagement

About you and your work																																			
1. What is the name of your company?	Centrica Plc – Distributed Energy & Power (DE&P) division																																		
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.'	This response is non-confidential and may be published. Any DNO wishing to discuss our response may contact me at <a href="mailto:helen.stack@centrica.com">helen.stack@centrica.com</a> .																																		
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>	SP Energy Networks (SPEN)  This response is for the single Electricity North West licence area.																																		
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: 15%;"></th> <th style="width: 45%;">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 colspan="2" rowspan="2">We require LV and HV/EHV connections. I do not have specific numbers.</td> </tr> <tr> <td>HV and EHV work</td> </tr> <tr> <td rowspan="3" 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> <tr> <td>Other 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	We require LV and HV/EHV connections. I do not have specific numbers.		HV and EHV work	<b>Unmetered Connections</b>	Local Authority (LA) work			Private finance initiatives (PFI) Work			Other work		
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## 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**

<p>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.</p>	none	1	2	3	4	5	6	>6
		x						
<p>2. How many DNO Stakeholder events have you been to? This can also include meetings outside of official engagement events. Please tick a box.</p>	none	1	2	3	4	5	6	>6
	x							
<p>Comment on the number of DNO Stakeholder events we have been invited to or been to.</p>	<p>We don't record centrally the number of events that we have been invited to or attended.</p> <p>I have only just registered as a connection stakeholder, so did not receive invitations in the past 12 months.</p>							
<p>3. Tell us about how the DNO engaged with you:</p> <p><b>a)</b> What did the DNO do?</p> <p><b>b)</b> How did the DNO do it?</p> <p><b>c)</b> Did the DNO have a robust engagement strategy?</p>	<p>I had not previously registered as a stakeholder, but based on the events listed in forward plan, I have no reason to doubt that the DNO does not have a reasonably robust engagement strategy.</p>							
<p><b>The DNO's work plan</b></p>								
<p>4. <i>Objectives:</i> Have you seen the DNOs work plans and the objectives they outline?</p> <p><b>a)</b> Does it take into consideration your needs? If so, how?</p> <p><b>b)</b> If it doesn't please explain why.</p>	<p>Yes.</p> <p>We did not review this last year, but the Looking Back report contains some topics that meet our needs e.g. queue management, heat map improvements and flexibility procurement.</p>							

	On A&D fees – as mentioned in our responses on other DNO areas – the process within the ENA to harmonise A&D fees (based on the action in the SSFP Update) is opaque.			
<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><b>Project Management Action 6</b> – Our connections team was critical of SPEN’s performance for this period. I note that project management had been identified as an area for improvement with work to up-skill project managers. Our feedback to Question 9 below suggests that our experience has not been as positive as the endorsements listed under Action 6 and there is still room for improvement.</p> <p>We have no reason to doubt that the DNO has delivered in other areas.</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 report shows all 13 strategic improvement actions as complete but does not explicitly compare the KPIs set last year against what was achieved. Assuming these align, they seem appropriate.</p>			
<b>Your feedback on the DNOs stakeholder engagement performance</b>				
<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>	Yes			
<p>8. How satisfied are you with the DNO’s overall engagement performance?</p>	very unsatisfied	not satisfied	satisfied	very satisfied
			x	
<p>9. General feedback – please provide any further feedback on the DNO’s 2018/19 engagement performance not covered in your responses above.</p>	<p><b>This is feedback on how our connection managers have found the experience of working with NPG during the past year.</b></p> <p>Our connections team says that SPEN overall frequently delivered a poor service. SPEN connections staff are hard to get hold of and slow to respond. Our connections team feels that SPEN is overly pernickety about the</p>			

	<p>requirements that they place on us, but lax in providing any details back to us (for example providing us with incorrect KVA's etc.)</p> <p>I have marked 8 as "satisfied" only because there is evidence of positive engagement in other areas. I hope that Project Management action for 2019/2020 will help address the problems we have experienced.</p>
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## 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?	Yes
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>Yes – based on the feedback from our connections team there is still scope for improvement on Project Management, so pleased to see this in Action 7.</p> <p><u>Delivering the improvements listed in Ofgem's open letter:</u></p> <p>The SPEN forward plan covers multiple actions around preparing for the uptake of EVs but is not as strong in other areas that help more flexible DER connect to the network, compared with other DNOs.</p>

	However, we do note work that SPEN is undertaking elsewhere on DSO transition etc under the innovation umbrella, which is not explicitly listed in the Looking Forward plan KPIs.
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.)?	Yes
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?	The strategy appears to be informed by a broad range of stakeholders.

## 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
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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