

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? 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.'	This response is non-confidential and may be published. Any DNO wishing to discuss our response may contact me at helen.stack@centrica.com .																																		
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.	Electricity North West (ENWL) 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;">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 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;">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	We require LV and HV/EHV connections. I do not have specific numbers.		HV and EHV work	Unmetered Connections	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

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
								x
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
		x						
Comment on the number of DNO Stakeholder events we have been invited to or been to.	We don't record centrally the number of events that we have been invited to or attended. I have been invited to >6 events by e-mail, but my location makes it hard to attend.							
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>The ICE engagement events are easy to find on the DNO website. We get regular and timely invitations to events.</p> <p>We welcome the increased use of webinars this year, especially on topics such as G99.</p> <p>We find it useful that the DNO has made available for download both slides presented at past events and event feedback. These are uploaded in a timely manner. Event feedback is very concise and to the point – we would like more information on how ENWL intends to act on the feedback.</p> <p>Senior ENWL staff were also present at ENA Open Networks Project stakeholder events, which should be noted as another way in which the DNO is engaging with stakeholders on future developments.</p> <p>Overall the DNO has a robust engagement strategy.</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>Have we seen the work plans and objectives? Yes. We reviewed the DNOs current work plan as part of the ICE process last year.</p> <p>Does it take into consideration our needs? Partially – but ENWL is complying with its mandatory requirements.</p> <p>The current work plan only covered LV DG connections in detail. A high-level DG HV/EHV work plan was published on a voluntary basis. Whilst ENWL is complying with its regulatory obligations under ICE (as set out in 1.1 of this year's report), we believe this is a flaw in the ICE process. We would prefer both segments to get equal treatment.</p> <p>For the LV DG sector, the Looking Back Report shows a clear process for identifying needs. It would be useful to have a stakeholder materiality map for the DG HV/EHV sector too.</p> <p>Like last year, there is still relatively little detail on the stakeholder concerns that led to the identified needs and low detail on the measures being taken to meet these needs.</p> <p>In summary, a lot of text is dedicated to explaining how stakeholder needs were identified. Relatively little text is dedicated to saying what the needs are and how these will be met.</p>
<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>Yes - some clear numeric KPIs were set and met e.g. around time to quote, where KPIs were exceeded.</p> <p>The communications and event invitations we received matches ENWL's description of its performance.</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 quantitative KPIs are clear, concise and appropriate.</p> <p>We are still also looking for qualitative improvements across all the DNOs e.g. in data provision and would therefore welcome some more detailed description of the improvements planned and/or made.</p>			
<p align="center">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>The DNO has sought feedback from a broad range of stakeholders. It is harder to score how the DNO's strategy has taken this into account. There is only one concrete example given – where DG LV customers said they would prefer no charge for connection offers and ENWL did not introduce any charges.</p> <p>Looking back at ENWL's reports of DG stakeholder workshops I'm not convinced that on topics such as capacity availability, flexible services and heat maps that ongoing feedback has been considered.</p> <p>The strategy only reflects a couple of the stakeholder needs from the list in Ofgem's open letter. One positive example for "providing more clarity on the rules and processes for connections" is the G99 webinar.</p>			
<p>8. How satisfied are you with the DNO's overall engagement performance?</p>	<p>very unsatisfied</p>	<p>not satisfied</p>	<p>satisfied</p>	<p>very satisfied</p>
			<p align="center">X</p>	
<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>We would like to use this section to feedback on the service that our connection managers on the ground have experienced when engaging with ENWL over the past year.</p> <p>This feedback relates to DG connections at HV and EHV level:</p> <ul style="list-style-type: none"> • ENWL are responsive if you telephone them, but otherwise communication is particularly slow. • Working with ENWL on sites caught by Statement of Works / mod apps has been a very slow and painful process. 			

	<ul style="list-style-type: none"> ENWL is struggling to manage and communicate the securities and cancellation risks under the revised Statement of Works process. This still has not been resolved. <p>On a more positive note – and to balance this out – ENWL has been instrumental in pushing the ESO to progress work on the CUSC modification CMP298 to update the Statement of Works process. CMP298 has been delayed by c 1-year by lack of resourcing in both the ESO as code administrator and as proposer of the mod.</p> <p>Other General Feedback</p> <p>We would like to see more engagement on the areas identified in Ofgem’s open letter e.g. providing transparency on where to connect and providing more information and flexibility around connection queues.</p> <p>We would like to see information on how ENWL is complying with ENA guidelines and commitments, including those agreed as part of the Open Networks Project.</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	Yes. As last year, ENWL has good mechanisms for engaging with connection stakeholders and holding joint discussions. We’d welcome opportunities for stakeholders to join discussions online e.g. through webinars. It would be
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and facilitating joint discussions where appropriate?	good to see feedback emerging from engagement sessions being incorporated in the strategy during the year.
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 – we can see it captures some feedback from the engagement sessions. For the DG HV/EHV workplan we welcome commitments around improving visibility of network capacity, connection charging, interactivity, constraint communications, flexible connections and flexible services. These additions do represent an increased level of engagement on the areas identified in Ofgem’s open letter.</p> <p>We would like to see information on how ENWL is complying with ENA guidelines and commitments, including those agreed as part of the Open Networks Project.</p> <p>ENWL should consider incorporating EV charging point connections in its work plan in the future.</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.)?	Yes – but where there is a qualitative element we would still like to see more detail, but it is an improvement on last year.
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?	Yes

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
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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