

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.	UK PowerNetworks (UKPN) This response is for all DNO areas.																																		
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: 35%;">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 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. As the respondent I have not received invitations to UKPN stakeholder events directly, but UKPNs website clearly shows that a number of events have been held capturing a broad range of stakeholders.							
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 Looking Back report and website shows that UKPN held a good number of surgeries, including one specifically for DER, which is our main area of interest.</p> <p>The website shows that there is other engagement material, like a Connections Quarterly Newsletter.</p> <p>It is not clear how stakeholders should sign up to get notified of these publications and events or if the stakeholder is expected to check the website pages for updates.</p>							
The DNO's work plan								
4. <i>Objectives:</i> Have you seen the DNOs work plans and the objectives they outline? a) Does it take into consideration your needs? If so, how?	Yes – we saw the work plans and objectives as part of the Forward Report last year.							

<p>b) If it doesn't please explain why.</p>	<p>a) The work plan aligned with several our needs as a stakeholder seeking to connect flexible DER and distributed generation. We agree with prioritisation of initiatives to better identify locations where flexibility services might be required. We welcome publication of the Flexibility Roadmap.</p> <p>Additionally, p71 of this year's report shows how feedback Centrica provided last year was incorporated in the DNOs workplan and objectives that are now part of the Looking Back report – with those objectives delivered.</p> <p>b) Active Network Management (ANM) – <i>This is a comment, rather than a statement that the plan does not meet our needs.</i> We remain concerned that DNOs could move towards an over-reliance on ANM which could undermine the investment case for storage and other flexible DER. We believe that that DNOs should develop commercial markets to procure services from flexible DER as an alternative to curtailment.</p> <ul style="list-style-type: none"> • We note the positive work UKPN is undertaking on the development of flexibility markets. • We also welcome delivery of the 2018/19 initiative to give ANM and FDG customers visibility of the real time status of their connections. • ANM has a role but must not be the default solution.
<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. UKPN's Looking Back report is one of the most detailed of all the DNOs and this makes it easy to understand what has been delivered.</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.	Yes – they were appropriate and the DNO appears to have met the outputs.			
Your feedback on the DNOs stakeholder engagement performance				
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?	Yes – the DNO appears to have incorporated feedback from a broad range of stakeholders. Yes – the DNO appears to have taken feedback into account. For example, the DNO has understood the importance of providing more granular information to DER stakeholders.			
8. How satisfied are you with the DNO's overall engagement performance?	very unsatisfied	not satisfied	satisfied	very satisfied
			x	
9. General feedback – please provide any further feedback on the DNO's 2018/19 engagement performance not covered in your responses above.	<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 UKPN over the past year.</p> <p>Some positive and some less positive feedback.</p> <ul style="list-style-type: none"> • One connections team say: "Overall frequently deliver a good service. Network Planners are quick to respond and helpful on complex projects" • Another connections team dealing with larger DG connections say: <ul style="list-style-type: none"> ○ "We had issues with UKPN planning last year on [a DG project] – on completing the connection. This was driven by poor communication on their part and a change of project manager mid-way through. Despite being in communication with UKPN all along about the project we were not informed that we had to book a system outage, so the connection could occur. By the time we were informed, it delayed the project by weeks." 			

	<ul style="list-style-type: none"> ○ On another DG project "Better performance on [Project name] experienced to date." ○ "Disappointing performance on a budget quote for a 33kV connection – had to chase numerous times."
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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.</p> <p>There are some initiatives that are very relevant to our interests around:</p> <ul style="list-style-type: none"> • SLAs for responses to enquiries from flexibility providers • Reducing curtailment uncertainty for flexible customers • Promoting flexibility revenue opportunities

	<ul style="list-style-type: none"> • An overlay of market mechanisms to enable more efficient management of network constraints • Development of the ONP System Wide Resource Register • Several outputs aimed at connecting EVs • Enhancing the DG mapping tool • Factsheets to help users make use of UKPN's various online tools. <p><u>Does the work plan align with the wider DNO areas identified for improvement in Ofgem's open letter?</u></p> <p>Yes – for all apart from promoting storage in connection queues, which is still in development in the Open Networks Project.</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>Yes.</p> <p>UKPN should be commended for listing outputs that create real improvement for customers, rather than just showing that they are conducting engagement activities.</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>Yes – it is very useful to see the prioritisation rankings.</p> <p>There Forward Plan contains plans for some useful workshops. It would be useful if UKPN had a mailing list where stakeholders could opt in to be informed of these, rather than having to rely on checking the website, with a clear sign-up location.</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
- 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