

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.	UK Power 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>47 sites</td> <td>459 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	47 sites	459 MWp	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
								**
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 UKPN.</p> <p>Version 1.0 of the Best Industry Practice Manual (BIPM) for Management of network constraints on solar PV generation was published in June 2018 with the engagement of UKPN. In a series of meetings prior the approval of the BIPM, UKPN shared an obvious 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. Over time, it was possible to reach a consensus with UKPN on the following points:</p> <ul style="list-style-type: none"> - UKPN must 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. - Where incidents exceed a threshold of production losses, UKPN would be obliged to consider mitigation strategies and accept any where their own obligations could be fulfilled. 							

	<p>- UKPN were to 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>After the approval of the BIPM in June 2018, UKPN has reduced the level of engagement with generators, and has not taken into consideration most points agreed in the manual. No further improvements have been considered during last year:</p> <p>- UKPN must improve the quality of their communications. Notifications of disconnection or curtailment would have to be logged and qualified correctly in a portal so that generators would have an opportunity to consider legitimate mitigation options.</p> <p>- UKPN must find a way with the generators to share information, without any breach of confidentiality, allowing multiple stakeholders to be aware of, and act upon, opportunities for improvement of grid infrastructure.</p>
<p style="text-align: center;">The DNO's work plan</p>	
<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>- UKPN still has not developed an efficient web portal to make it easier for the generators to find the information on grid constraints. All the information is provided by email (The Year Ahead Plan and Monthly Plan). An outage planning tool is expected by March 2020 according to their plans, what is long time to wait for given it was promised by the end of 2017.</p> <p>However, most network constraints are not included in the Year Ahead Plan 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, and additional constraints are added throughout the year, leaving PV generator planification difficult.</p> <p>The Monthly Plan is more comprehensive than the Year Ahead Plan, but it does not always include all network constraints affecting generators.</p>

	<p>Information delivered on these plans is sometimes difficult to understand as the name of the PV generator is not usually provided. If the UKPN could provide Site names, or MPAN it could be better. On many occasions additional contact must be made to have the generator name revealed which is often left unanswered and results in us constantly chasing for an answer. The inclusion of MPAN numbers in these notifications have been requested multiple times without success.</p> <p>Sometimes there are some notifications as an individual email, just with text information, which couldn't be the comfortable way to report about the Outage.</p> <p>There is a possibility of some disinformation because of not updated info: one day you could firstly receive a notification, that says that the particular site will not be affected by an outage, and after that you could receive a report with several notifications, where the same site is written as Affected.</p> <p>Generally speaking, UKPN work plans do not take PV generator needs into consideration. Network constraints are planned internally by UKPN 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>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 via the Year Ahead Plan, the Monthly Plan and individual emails.</p> <p>The Monthly Plan is more comprehensive than the Year Ahead Plan, but it does not always include all network constraints affecting generators.</p> <p>There are not many details in its Work plan provided, apart from the constraint start, end date and the reason for the constraint. Additional details on the works performed would be useful to better understand how reasonable the constraint is. For engagement on information requests, UKPN has a leeway of 30 days to respond which is not efficient for PV generators, even if they have reduced an AVERAGE time to 10 days, it is still too long. This leeway should be reduced in the future and punctual information on planned and unplanned network constraints is expected.</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.	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.			
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?	Although UKPN had made important efforts during the last two years to improve the communication with generators, there is a number of relevant gaps and no additional efforts have been made in the last year to face them. Some of the points that need further improvement and on which UKPN is not being very proactive: - 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 UKPN 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.	Not satisfied			

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>UKPN 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. Solar Trade Association's DNO workgroup is the preferred forum to engage with UKPN and the Best Industry Practice Manual is the framework for continuous improvement.</p> <p>However, it should be noted that this engagement in conversations is being translated into effective actions to solve the problems of the generators.</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>UKPN have activities planned for the upcoming year some of which are of interest to Quintas Energy. Again, Solar Trade Association's DNO workgroup is the preferred forum to engage with UKPN and the Best Industry Practice Manual is the framework for continuous improvement.</p> <p>Some of the points that need urgent attendance and have not been considered in the work plan of activities include:</p> <ul style="list-style-type: none"> - Development of a more efficient web portal to provide punctual information on network constraints. - Reduce leeway about information requests.

	<ul style="list-style-type: none"> - Communication about options to minimise the effects of generation constraints. - Communication of information about UKPN network security and areas with more faults. - Network alterations to minimise constraints for specific PV sites.
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.)?	We have not been provided with a list of relevant outputs that will be delivered during the regulatory year. We would expect UKPN 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.
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?	UKPN has proposed strategies and activities and they have fully informed PV generators. These plans are available in their website and notification to PV generators have been delivered. Once again, actions based on these meetings are not taken as expected.

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