

sResponse 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.	Western Power Distribution (WPD) This response is for all WPD 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: 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							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						x
Comment on the number of DNO Stakeholder events we have been invited to or been to.	<p>We don't record centrally the number of events that we have been invited to or attended.</p> <p>I attended at least one WPD innovation event but was not invited to any. See Q3 for more details.</p> <p>I know that colleagues have attended other WPD innovation events.</p>							
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>WPD's report suggests a reasonably robust and logical engagement process, but it is hard to find evidence to support this if you start from the connections pages of the WPD website.</p> <p>WPD's reports this year show that it held a number of engagement events. A small % of these were directly on connections, but the broader range of topics are aligned with our needs.</p> <p>If I go on to the WPD website now and go to the connections pages there appear to be no obvious links to future or past events or information on the steering groups mentioned in this year's ICE Reports.</p> <p>Material does exist if you Google the event or steering group mentioned in this year's report. I'd suggest that WPD provides clear links and/or information on these events and on the steering groups, including how to join all of these, in the connections section of the website.</p>							

	<p>We agree with WPD's view on page 4 that engagement should not be a tick-box exercise and prefer actions over talking shops. But it would helpful if information on events, including material from past events, would be easier to find.</p>
<p>The DNO's work plan</p>	
<p>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? b) If it doesn't please explain why.</p>	<p>Yes, we saw the DNO's work plan as part of this consultation last year.</p> <p>Last year we said that the Forward Plan did not necessarily capture points raised during a DG stakeholder feedback workshop. We also said that the KPIs were vague – i.e. a KPI of 'positive feedback' is not sufficiently clear.</p> <p>We welcome the increased use of webinars – this is helpful for stakeholders who work nationally.</p> <p>On the contents of the work plan, it offered and delivered on several targets that met our needs as a DG customer e.g. provision of historic outage information, improving information on network capacity and constraints and increased information on DUoS.</p>
<p>5. <i>Actions:</i> Do you think the DNO has delivered its work plan? a) How has the DNO done this? b) If you do not think the DNO has delivered its work plan, please explain why.</p>	<p>Yes</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>Last year we said that the KPIs and targets were vague e.g. <i>KPI = "feedback from stakeholders on report", Targets = "Positive feedback received"</i></p> <p>In its main Looking Back Report this year WPD decided not to publish a KPI table showing the KPIs achieved against targets. I would like to provide feedback that the full Appendix 1 is very useful to stakeholders because it provides transparency on where WPD may have had trouble in meeting stakeholder needs e.g. in obtaining capacity to connect. The straight forward information in Appendix 1 is some of the most useful in the report.</p>

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 2018/2019 work plan covered several areas that met our needs. WPD's work plan also looked to deliver improvements for other stakeholder groups.			
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 WPD over the past year.</p> <ul style="list-style-type: none"> One team involved in connections say: "Overall frequently delivers an excellent service, good communication from Network Planners and have on occasion gone above and beyond the expected level of service." Another team are less positive: <ul style="list-style-type: none"> The issue is that the team can get a rough quote from the 11kV planners relatively quickly but feel they are waiting too long for confirmation that this is feasible at the higher network levels. They feel this is down to a lack of communication between the 11kV team and the 33/132kV team. Although this is starting to improve, it remains an issue when looking at new sites. On '<i>promoting certain types of customers (such as storage) in a connection queue</i>' this team is frustrated that they could be connecting storage batteries that would help the area as a whole, but the connection quotes are prohibitive – running into several £ millions. As noted in our responses we know that work is still ongoing on this in the Open Networks Project, but this is good example of why concluding the ENA guidelines would be helpful. 			

	<ul style="list-style-type: none"> ○ WPD's interpretation of G99 requirements has led to prohibitive costs for communications equipment. The team feels that the requirements for such high spec communications equipment are unwarranted when the site already has good communications infrastructure. [Note – I do not have a comparison with other DNO areas, so it may not just be a WPD issue.]
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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?	Probably. On the connections section of its website, WPD should make it clearer to stakeholders how they can get involved in the planned engagement activities and provide clearer access to records of engagement events when they have passed.
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>The forward work plan as a range of activities that match our interests as a DG customer.</p> <p><u>Some brief comments</u></p> <p>1.1 LCT Forecast Information – in the spirit of 'presumed open' this information should be made available to all stakeholders not just local authorities.</p>

	<p>2.4 Flexibility Webinars – needs to be clear to general stakeholders how to sign-up for these.</p> <p>4.1 Review A&D fees – general comment to all DNOs that this work, as requested in the Smart Systems and Flexibility Plan Update – is opaque to stakeholders.</p> <p>Open Networks Project guidelines – general comment to all DNOs that we would like to see the ICE process used as a means of DNOs demonstrating their level of compliance with the ENA guidelines developed as part of the ONP.</p> <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. The work plan is particularly strong on work to support the uptake of EVs.</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.)?	As last year, many KPIs are limited to something vague like ‘stakeholder feedback’.
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>Probably. Certainly, WPD captures a broad range of stakeholders in its wider activities.</p> <p>I would like to see a clear path for connection stakeholders to register for events, steering groups and updates i.e. signposted from the connections part of the website.</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