

Response template – Incentive on Connections Engagement

About you and your work																																					
1. What is the name of your company?	TUSC Limited																																				
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 making any part of your response confidential.'	No																																				
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 LPN, UK Power Networks EPN, UK Power Networks SPN																																				
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 style="text-align: center;">10</td> <td style="text-align: center;">2</td> </tr> <tr> <td>High Voltage (HV) Work</td> <td style="text-align: center;">10</td> <td style="text-align: center;">34</td> </tr> <tr> <td>HV and Extra High Voltage (EHV) Work</td> <td style="text-align: center;">10</td> <td style="text-align: center;">34</td> </tr> <tr> <td>EHV work and above</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> </tr> <tr> <td rowspan="2" style="text-align: center; vertical-align: middle;">Metered Distributed Generation (DG)</td> <td>LV work</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> </tr> <tr> <td>HV and EHV work</td> <td style="text-align: center;">1</td> <td style="text-align: center;">10</td> </tr> <tr> <td rowspan="3" style="text-align: center; vertical-align: middle;">Unmetered Connections</td> <td>Local Authority (LA) work</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> </tr> <tr> <td>Private finance initiatives (PFI) Work</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> </tr> <tr> <td>Other work</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> </tr> </tbody> </table>				Type of connection	Total number of connections	Total MVA of connections	Metered Demand Connections	Low Voltage (LV) Work	10	2	High Voltage (HV) Work	10	34	HV and Extra High Voltage (EHV) Work	10	34	EHV work and above	-	-	Metered Distributed Generation (DG)	LV work	-	-	HV and EHV work	1	10	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

<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
								✓
<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
								✓
<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>	<p>UKPN held various stakeholder engagements & workshops. They invited contributions both during those events and separately. They further engaged via ad hoc telephone calls, emails and informal meetings. We find the engagements very robust, productive and customer friendly. The nature of their engagements is in our view very close to becoming the industry leader. (TUSC's definition of the "industry" includes communications, gas and water network operators.)</p>							
The DNO's work plan								
<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 have seen UKPN work plans and objectives. Not only do they take into accounts TUSC's clients' needs, but they recognise that there is more to be done.</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, but what is more significant is that UKPN acknowledges the need for continual improvements and ongoing innovations.</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.	UKPN made considerable efforts and cross checked on many occasions with its stakeholders that its outputs were appropriate. TUSC believes that UKPN did meet these outputs as far as was practicable.			
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. One of the great difficulties for DNOs is the ever changing requirements of its stakeholders, especially customers. The actual Ofgem process needs also to be updated to reflect changes in the 'real world'.			
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.	It cannot be stressed enough the immense effort UKPN is making to ensure the broadest range of stakeholders are engaged. We look forward to that continuing.			

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, 100%. From TUSC's perspective as a customer representative and agent, we are finding that no avenue for engagement with stakeholders is closed. From a wide range of formal workshops and meetings interspersed with interludes to the open door policy it is endeavouring to develop, UKPN's strategy is working. We must add the caveat that a very small number of UKPN employees are not aligned with the highly commendable senior management approach, preferring instead to resist engaging with and updating customers during the delivery stage of new connections.
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?	Yes, we agree with this. From a customer perspective we would also like to see Ofgem placing on the 'radar' consideration of what needs to be done to allow UKPN to compete on level terms with IDNOs. At present UKPN (and other DNOs) are often being used merely as 'stalking horses' to provide benchmarks against which ICPs and IDNOs can compete. We believe that the CiC 'market' is rapidly approaching the point where it will have consolidated enough to withstand equal competition from UKPN, which in turn can only benefit customers.
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?	Yes. UKPN could not have made more effort than it has to ensure that a broad range of connection stakeholders have been included.

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
-

	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