

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.	Northern Powergrid (NPG)																																		
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 colspan="2" style="text-align: left; padding: 5px;">Type of connection</th> <th style="text-align: center; padding: 5px;">Total number of connections</th> <th style="text-align: center; padding: 5px;">Total MVA of connections</th> </tr> </thead> <tbody> <tr> <td rowspan="4" style="width: 15%; text-align: center; vertical-align: middle; padding: 5px;">Metered Demand Connections</td> <td style="padding: 5px;">Low Voltage (LV) Work</td> <td style="width: 20%;"></td> <td style="width: 20%;"></td> </tr> <tr> <td style="padding: 5px;">High Voltage (HV) Work</td> <td></td> <td></td> </tr> <tr> <td style="padding: 5px;">HV and Extra High Voltage (EHV) Work</td> <td></td> <td></td> </tr> <tr> <td style="padding: 5px;">EHV work and above</td> <td></td> <td></td> </tr> <tr> <td rowspan="2" style="text-align: center; vertical-align: middle; padding: 5px;">Metered Distributed Generation (DG)</td> <td style="padding: 5px;">LV work</td> <td colspan="2" rowspan="2" style="padding: 5px; vertical-align: top;"> We require LV and HV/EHV connections. I do not have specific numbers. </td> </tr> <tr> <td style="padding: 5px;">HV and EHV work</td> </tr> <tr> <td rowspan="3" style="text-align: center; vertical-align: middle; padding: 5px;">Unmetered Connections</td> <td style="padding: 5px;">Local Authority (LA) work</td> <td></td> <td></td> </tr> <tr> <td style="padding: 5px;">Private finance initiatives (PFI) Work</td> <td></td> <td></td> </tr> <tr> <td style="padding: 5px;">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

<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
								x
<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
								x
<p>Comment on the number of DNO Stakeholder events we have been invited to or been to.</p>	<p>We don't record centrally the number of events that we have been invited to or attended.</p> <p>We have been invited to >6 events by e-mail. Centrica has attended numerous NPG stakeholder events during 2018/19 across the innovation and connection areas. These events are always well run.</p>							
<p>3. Tell us about how the DNO engaged with you:</p> <p>a) What did the DNO do?</p> <p>b) How did the DNO do it?</p> <p>c) Did the DNO have a robust engagement strategy?</p>	<p>Centrica DE&P employees are on a DNO stakeholder e-mail lists and have attended events where possible. The ICE engagement events are easy to find on the NPG website.</p> <p>It is useful that NPG provides online access to material presented at engagement sessions and playback on-demand from past webinars.</p> <p>Reviewing the Looking Back report and other written material available on line suggests that NPG has a logical and robust approach to engagement. Events that we attended in the past year have been well run. At many stakeholder events NPG organises breakout discussions that are designed to capture stakeholder views.</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? Yes. Areas that matched our needs were access to more detailed network information and work on the T/D interface to update the Statement of Works process.</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 – in most areas.</p> <p>a) Stakeholder engagement events are professionally run. New online tools and guides were provided in a number of areas.</p> <p>b) Statement of Works – we would like to point out that the process to embed the more streamlined 'Appendix G' into CUSC was delayed. This delay can be attributed to the ESO, not the DNOs. We saw NPG actively pushing the ESO For progress on this.</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>Yes – reasonably and for the purpose of the incentive.</p> <p>Several of the measures of success were just to obtain stakeholder feedback. For example, Action 6.3 around improving the connections process for flexibility service providers is marked complete because feedback was obtained, but this does not mean that any improvements were delivered. However, NPG's report does show that this feedback process is contributing to longer-term improvements (a procurement method roadmap and a Customer Flexibility Plan are mentioned.)</p>
<p>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>Yes – both the Looking Back and Looking Forward reports detail how the DNO's activities are linked into feedback received from a range of stakeholders.</p>

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>This is feedback on how our connection managers have found the experience of working with NPG during the past year.</p> <ul style="list-style-type: none"> • One connection team say: "Overall frequently deliver a competent service. Not overly keen on looking further if the simplest option is not available." • Another connection team working on larger DG projects say: <ul style="list-style-type: none"> ○ "DG connection at [project name] was relatively smooth with a reasonable level of service." ○ "Ongoing request to increase capacity at [a DG site] is taking a significant amount of time. NPG state that their performance is hampered by a National Grid mod app." The team reports that there seems to be friction between NPG and the ESO over the mod app and we are unable to connect until the issue is resolved between NPG and the ESO. However, the team also reports that NPG is working proactively to move things forward. 			

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>Yes. We can see this working in practice and the written Looking Forward plan also shows how NPG has a structured approach for engaging stakeholders.</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>Yes</p> <p>Examples of actions in the Looking Forward plan that help meet are requirements are:</p> <ul style="list-style-type: none"> • EV connections guide and engagement on • facilitating EV roll-out, • providing clear contact details for the connections team • providing updates on the Statement of Works process and Appendix G • further updates on NPG's DSO strategy (for the purposes of ICE – only relevant if this helps with NPG connecting more DG) <p>As general feedback from reviewing all the DNO plans, we still want to see the DNOs doing more to free up capacity for connections.</p> <p>Does the Looking Forward plan meet the improvements listed in Ofgem's open letter? – Partially. Yes on providing clarity on connection processes, helping customers use the NPG's network availability heat maps and seeking feedback on their functionality and engaging on EV connections. Where it does not is perhaps out of scope of ICE and why we believe that ICE needs to be reviewed by Ofgem to ensure it is fit for purpose. For example the promotion of customers in connections queues links into the work of the Open Networks Project (ONP). We would like to see all DNOs being required to report on their compliance with the ENA connection and flexibility guidelines developed under the ONP.</p>

	<p>Assessment & Design Fees (A&D Fees) – This comment is also aimed at all DNOs and the ENA. NPG in the Looking Forward plan introduction says that A&D Fees are not in the plan although these remain an issue for customers. NPG says that it is contributing to the national debate. In the Smart System and Flexibility Plan Update Ofgem and BEIS asked the ENA to establish a forum for ensuring a common approach to A&D Fees. As a stakeholder we have seen no evidence of this work being progressed by the ENA. We understand that work may be being undertaken somewhere under the auspices of the ENA, but this is completely opaque. We believe this is an area which all DG customers should be updated on.</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 – noting that the publication of guides is very useful as it is not always possible to attend face-to-face events.
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 - informed by, there is a clear feedback loop.

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