

RIIO-ED2 Decarbonisation and the Environment Working Group: session 5



RIIO-ED team
02 April 2020

Purpose of today's meeting is to:

- To consider the appropriate arrangements for the Environmental Action Plan in ED2
- To consider UKPN's Environmental Incentive proposal
- Review the stress-tested scenarios and the implications for the ED2 arrangements

Timings	Agenda item
09:50 – 10:05	1. Intro/recap
10:05 – 11:05	2. Scope of Environmental Action Plan a) SPEN presentation b) Roundtable discussion on potential options, incl. merits and drawbacks
11:05 – 11:15	Break
11:15 – 12:15	3. Environmental Incentive a) UKPN presentation b) Roundtable discussion on potential options, incl. merits and drawbacks
12:15 – 13:00	Lunch
13:00 – 14:30	4. Stress-test scenarios to determine if existing arrangements are appropriate a) Discussion on the decarbonisation scenarios developed ahead of the group b) Implications for the need for decarbonisation incentive [as raised in NPg's material]
14:30 – 14:45	Actions and next steps

Proposed dates and locations for D&E working group sessions

WG session	Date	Time	Location
1. Introductory session	9 December 2019	10am-4pm	Ofgem London offices (Room 1.11)
2. Group priorities and policy options: Decarbonising the networks (losses & BCF)	28 January 2020	10am-4pm	Ofgem Glasgow offices (Rooms 1 and 2)
3. Policy options: Reducing environmental impact	19 February 2020	10am-4pm	Ofgem Glasgow offices (Rooms 1 and 2)
4. Evidence and analysis: Reducing env. Impact and decarbonising the networks	12 March 2020	10am-4pm	Teleconference
5. Evidence and analysis: Reduce environmental impact	2 April 2020	9:50am-2:45pm	Teleconference
6. Policy options: transition to low carbon energy system	23 April 2020	10am-4pm	Teleconference
7. Evidence and analysis: Transition to low carbon energy system	21 May 2020	10am-4pm	Teleconference

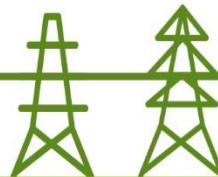
Item 1: Scope of Environmental Action Plan (SPEN)

RIIO-ED2

Decarbonisation & Environment Working Group

2nd April 2020

To what extent does the T2 EAP capture what DNOs should be considering in ED2



Environmental action plan initiatives: RIIO-2 Business Plan Guidance

- Current OFGEM guidance is that ED2 environmental and sustainability requirements will be aligned to those set out in RIIO-2 Business Plan Guidance Oct 19 for Transmission
- Companies expected to focus on three key areas;
 - Decarbonising the energy networks – with a focus on business carbon footprint and embedded carbon in networks
 - Reducing networks' other environmental impacts i.e. pollution to local environment; resource waste; biodiversity loss; and other adverse local effects that are specific to each sector
 - Supporting the transition to an environmentally sustainable low-carbon energy system

OFGEM Methodology Decision for ED2 expected Nov' 2020



Environmental action plan initiatives: RIIO-2 Business Plan Guidance

Business carbon footprint (BCF)

- Adopt science-based target for company to reduce its scope 1 and 2 BCF by 20XX, without relying on international GHG offsetting
- Commit to efficient and economic actions to address controllable BCF in RIIO-2
- Identify metrics to track outcomes of implementing actions and overall progress towards science-based target
- Commit to reporting on scope 3 emissions

Transmission losses (ET only) and Shrinkage (gas only)

- Develop and adopt strategy to contribute efficiently to fewer losses on network, including over the long term, than would otherwise be the case in the absence of strategy
- Report on key milestones of implementing losses reduction strategy
- Contribute to evidence base on proportion of losses that network companies can influence/control



Environmental action plan initiatives: RIIO-2 Business Plan Guidance

Embedded carbon

- Monitor and report on embedded carbon in new projects
- Collaborate with supply chain on addressing challenges to reduce embedded carbon in network
- Commit to establishing baseline and a target to reduce embedded carbon on new projects during RIIO-2

Supply chain

- Adopt high standards of environmental management in supplier code, including requirements for public disclosure of metrics and cascading code to their suppliers that are material to company's inputs
- Adopt target of more than 80% of suppliers (by value) meeting code in RIIO-2
- Report on actual percentage of suppliers (by value) meeting code



Environmental action plan initiatives: RIIO-2 Business Plan Guidance

Resource use and waste

- Update procurement processes to embed Circular Economy principles
- Adopt a target for:
 - Zero waste to landfill by 20XX
 - Recycled and reused materials as a percentage of total materials by 20XX
 - Report on actual waste to landfill, recycling and reuse as a percentage of total

Biodiversity/natural capital

- Adopt appropriate tool to assess net changes in natural capital from different options for new connections and network projects
- Adopt appropriate tool to monitor the provision of ecosystem services from network sites and report annually



Environmental action plan initiatives: Further Considerations

- Losses guidance to be updated to reflect Distribution requirements
- 'Supplier code' and 'public disclosure' wording might need to be discussed/updated to ensure all DNOs have a common understanding
- Slight confusion between Biodiversity and Natural Capital should be resolved
- CBA models should be updated to allow for environmental impacts and lifetime costs (in line with Decarbonisation Action Plan statement on trade-offs between current and future customers)
- How should difference licence areas be covered in EAP? Different governments, environmental regulators, local ambitions etc.
- DNO collaboration on incentives



Break

Item 2: Environmental Incentive (UKPN)

Environment and Decarbonisation Working Group - Environmental Incentives and Outputs

Ross Thompson
02 April 2020



Purpose

- Identify the areas of DNO activities that impact the environment and put them into context
- Explore the characteristics of these activities to help inform how outputs, incentives and other mechanisms can be designed to cover them
- Look at what applied in RIIO-ED1, what has changed in the period so far and how we have responded
- Share early thoughts on what incentives could be developed to cover environmental activities in RIIO-ED2

Business Carbon Footprint accounts for a relatively small part of our impact on the environment...

Wider emissions in our regions (indicative)

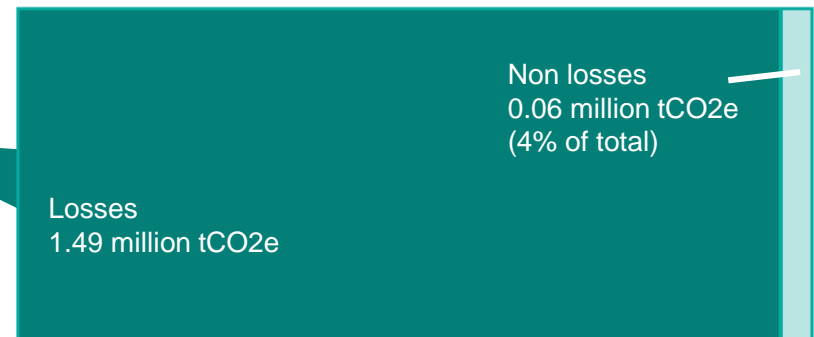
■ UKPN ■ Wider UK emissions from our area



DNOs' role in decarbonising the wider economy addresses a greater proportion of emissions than our own Business Carbon Footprint.

UK Power Networks BCF breakdown

■ Losses ■ Non-losses BCF



And our work on losses represents the large majority of DNOs' own emissions

UK figures taken from BEIS regional and local breakdowns using the most recent data (2017), regions do not exactly match DNO regions.

...nevertheless it should remain a distinct part of the ED2 framework

Advantages of outputs relating to non-losses BCF and wider environmental impact:

Setting an example: as companies leading the transition to a low carbon, low environmental impact economy, we have an opportunity to set an example and go above and beyond what most organisations are committing to.

Addressable: compared to losses and decarbonisation, BCF is less reliant on the actions of other parties, so DNOs can more directly manage it.

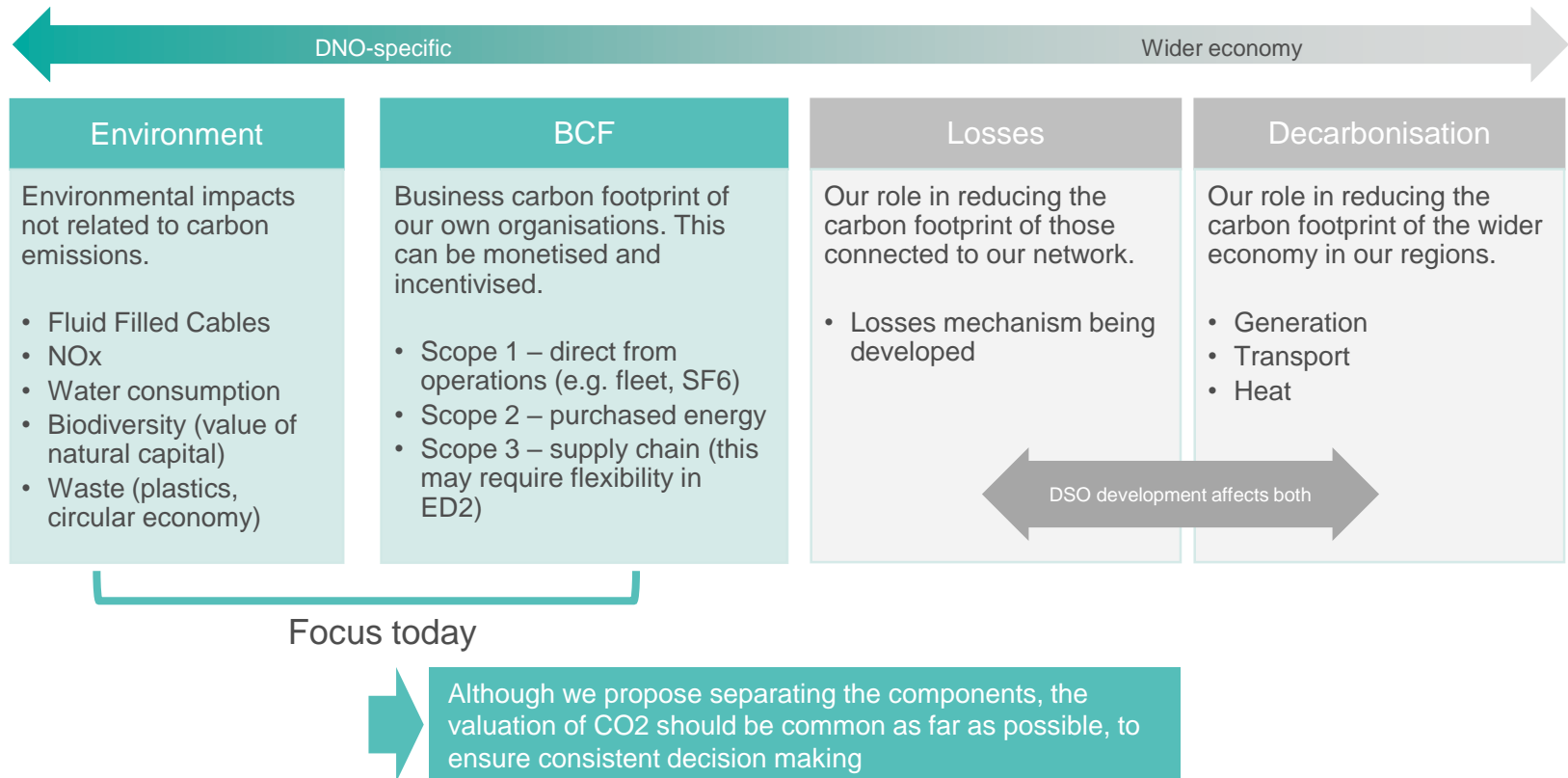
Benchmarking: companies in other sectors are making ambitious commitments to reduce their environmental impact, e.g. through reducing waste, water consumption or energy consumption.

Level of ambition: Outputs relating to BCF and environmental impact make us accountable for delivering in this area, and to the extent financial incentives are used, rewards ambition and successful delivery.







Balance of incentives: Incentivisation of one aspect of decarbonisation without others could drive the wrong behaviours (e.g. use of flexibility to connect low carbon customers quickly and efficiently may increase losses).

Customer and stakeholder: Initial views from DNO research and engagement and other sectors indicates that the environment is a priority for customers and stakeholders. This will continue to be tested as engagement continues.

Environmental impacts can be broken down into four components for the purposes of ED2



ED1 contained commitments set individually by DNOs and a reputational incentive to publish annual reports...

	2023 ED1 target	2021 Green Action Plan target
 Business Carbon Footprint	16% reduction	20% reduction
 Waste & Recycling	70% office & depot waste diverted from landfill, 98% street works waste recycled	90% of waste diverted from landfill, recycle 80% of applicable waste
 Noise reduction	Investigate 100% of all noise complaints	Ensure 100% LAs are aware of planning implications, overlay LA plans on asset maps
 SF6 loss reduction	Maintain emissions below 0.2% per annum	N/A
 Fluid filled cable loss reduction	Reduce by 2% per annum from ED1 start	N/A
 Undergrounding	Undergrounding the equivalent of 176km of HV overhead line	Undergrounding delivered based on engagement with stakeholders

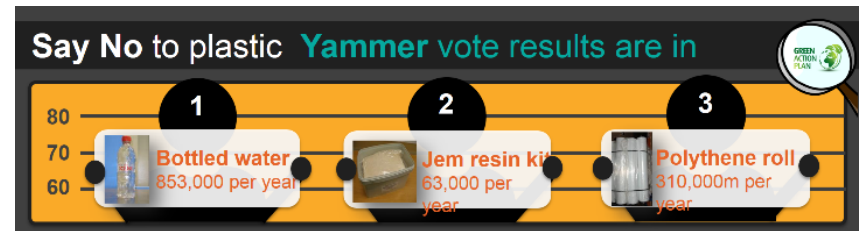
We have increased our ambition beyond original targets on those areas covered by our original commitments

...but there is an opportunity to encourage and reward responding to developments that occur after determinations are made in RIIO-ED2

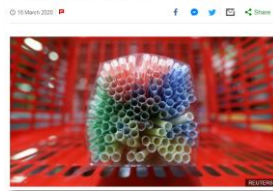
Developments in ED1:

- New requirements on persistent organic pollutants
- Accelerated Polychlorinated Biphenyls (PCB) removal
- Introduction of Ultra Low Emissions Zone
- Net-zero 2050 legislation
- Awareness of impact of plastic pollution

Further measures we've added to reflect our wider environmental impact:



Single-use plastics ban in Wales unveiled



Energy consumption



Water saving



Biodiversity Net gain



NOx and air quality



Circular economy

Gas distribution business plans include environmental commitments and significant investments – but inconsistently



- Set of **bespoke PCDs** to deliver a carbon neutral business by the end of GD2, including green energy, electric vehicles, offsets.
- **Reputational ODIs** around waste and staff-related emissions, with costs included in plan.
- Wider set of actions in the **Environmental Action Plan** on biodiversity, water consumption etc.



- Bespoke **ODI(R)** for BCF reduction using science-based targets for scope 1, 2 and 3 emissions, costs included in plan including hybrid vehicles and renewable electricity.
- Shareholder funded tree planting.
- **EAP commitments** on responsible resource use (no costs) and enhancing life on the land (costs included in plan).



- Suggest a **common PCD** for environmental initiatives, with further work needed to define these, covering BCF and wider environmental impacts
- **Bespoke PCD** for land remediation



- Set of **bespoke PCDs** covering low emission vehicles, renewable energy, biodiversity studies.
- Further commitments around energy efficiency as part of EAP

With transmission companies proposing similarly inconsistent environment related outputs and commitments



- **Bespoke UM or ODI** for targeted SF6 programme.
- **Bespoke PCD** for electric vehicles,
- Wider commitments with no funding request covering wider impact, e.g. business transport, renewable energy, efficiency, waste
- **ODI** to reward exceeding targets in some areas (e.g. waste, EVs)



- **Bespoke PCD** for site remediation.
- Wider commitments with no funding around waste, water and energy consumption.
- Climate commitment described as a 'NGGT commitment' including electric vehicles, renewable energy, but costs included in the plan to deliver this.
- Propose a **net-zero re-opener**.
- **Bespoke financial ODIs** for delivery over and above baseline targets for EAP.



- Costs included in the plan relating to environmental reviews, accreditation, data collection and collaboration with suppliers.
- **Science-based targets** for scope 1,2, and 3 emissions with costs in the plan.
- **Common ODI(F)** for SF6 and **bespoke ODI(F)** for additional contributions (e.g. on biodiversity, low carbon fleet)
- **Bespoke ODI(R)** for maximising environmental benefit from non-operational land



- **Common OFI(F)** for SF6 reduction
- **Bespoke PCDs** for scope 1 and 2 emissions and waste
- Sustainability strategy containing commitments relating to biodiversity, managing resources and waste.

We have an opportunity to get a more consistent approach built into the RIIO-ED2 framework

ED2 incentives should reflect the scale of the challenge and the nature of the different ways we affect the environment

ED2 requires meaningful arrangements designed to reward the right behaviour which recognise the scale and importance of the challenge.

They should also reflect the characteristics of each way we impact the environment:

	Consistent and clear measure across the period?	Consistent challenge and measure across DNOs?	Ability for DNOs to directly influence the outcome?	Costs possible to forecast ex-ante?
Scope 1 Carbon emissions	High: Set of performance indicators that can be measured and independently validated – can be expressed in terms of TCO2.	High: Can be consistently measured across companies either in terms of absolute amounts or reductions	High: Largely in control of DNOs to take action to reduce Medium: While influenced by the actions of others, DNOs can act to reduce	High: Actions to reduce emissions can be identified, understood and costed
Scope 2 Carbon emissions				
Scope 3 Carbon emissions				
Energy consumption (linked to S2)				
SF6				
Water consumption	High: Set of performance indicators that can be measured and independently validated	Medium: No established common measures (although some implicit in BCF reporting).	Medium: Partly dependent on other parties to deliver, e.g. technology progress to reduce consumption or emissions, capacity of parties to re-use materials,	Low: Cost to deliver likely to be offset by savings or efficiency resulting from the reduction in energy or water bills, landfill charges etc, or achieved through other activities.
Waste, recycling, circular economy				
NOX and air quality				
Fluid filled cables				
Biodiversity	Low: Balance of measures may change over ED2 as stakeholder and local priorities change and leading practice evolves	Low: actions and performance indicators should be tailored to local situations and stakeholder needs	High: while some rely on the supply chain to deliver, action is largely in the control of DNOs	Low: Costs likely to depend on local situations in each area
Noise				
Visual amenity				
New leading practice	Low: currently unknown	Medium: Element of competition between DNOs to lead	Medium: DNOs have a role, but so do other parties	Low: currently unknown
New legal requirements				

We propose working toward a package of outputs that reflects these characteristics

Scope 1 carbon emissions (including SF6)
Scope 2 carbon emissions
Energy consumption
Scope 3 carbon emissions
Fluid filled cables
Water consumption
Waste, recycling, circular economy
NOX and air quality
Biodiversity
Noise
Visual amenity
New leading practice
New legal requirements

Common approach with cost allowance

- Retain a consistent approach to measuring and reporting each element, reflecting that these are measurable and will remain relevant throughout ED2
- **Common PCD** – with associated allowance to fund actions to reduce BCF in terms of scope 1-2 (expecting scope 3 to be added in the future), with funding determined by a common model along the lines of CNAIM and making use of science based targets (e.g. investments to deliver a given BCF reduction)
- **Environmental Performance Incentive (EPI)** to encourage delivery beyond original outputs for quantifiable activities

Deliver requirements

- **Common PCD** to deliver targets for FFC. Further ambition could be rewarded through the EPI.

Qualitative measure

- Companies to develop an – **Environmental Qualitative Assessment Measure (EQUAM)** with stakeholders, elements of which could change over the price control.
- Success could be based on stakeholder feedback or performance on co-created measures, with a financial ODI attached to reward successful delivery.

EQUAM and/or re-opener

- New leading practice incorporated into the EQUAM above, co-created with stakeholders.
- **Re-opener** for material additional legal requirements introduced through the course of the price control

An Environmental Performance Incentive (EPI) could cover quantifiable differences in performance above or below baseline

The Environmental Performance Incentive aims to put decisions around business carbon footprint on an equal footing to decisions around losses, decarbonisation and other quantifiable environmental activities.

An (over)simplified example:

	FFC	BCF	Losses	Decarb	Total
Units	litres	tCO2	MWh	No. LCTs	
Target	100	100	100	100	
Outturn	90	95	110	115	
Outturn %	110%	105%	90%	115%	
Weighting	15%	35%	20%	30%	
Result	16.50%	36.75%	18.00%	34.50%	105.75%

- Weightings should be set to reflect a consistent underlying value (i.e. carbon price) to ensure consistent decision making. However, would also account for:
 - Company specific baselines (e.g. BCF starting position or length of FFC network)
 - Scale of potential benefit
 - Extent to which the activity is within the DNOs' control

Challenges we would have to overcome include consistent scope of the emissions covered across companies and reliance on weightings set ex-ante

The Environmental Qualitative Assessment Measure (EQUAM) rewards qualitative environmental initiatives

Some aspects of our environmental impact are difficult to express in terms of benefit and consistently across companies at this stage.

EQUAM aims to bring more qualitative measures of impacts into the price control:

- Builds on the Stakeholder Engagement approach, with a panel of experts judging company performance and evidence of stakeholder engagement (could be incorporated)
- Where possible, encourage a common approach across companies, co-creating with stakeholders, this could be based on SROI of different actions to reduce environmental impact
- The metric can flex in-period through discussion with stakeholders, for example scope 3 emissions might initially sit here, until companies developed enough confidence in its measurement to consider moving it into the EPI
- A financial ODI could be attached to reward high levels of ambition and delivery

Challenges we would have to overcome the interaction with innovation allowances and the proposed net-zero reopener, and agreeing a consistent index based on SROI across companies and stakeholder groups

The EQUAM could take one of two forms

Option 1 – operates above baseline only

- Companies identify a set of PCDs for their base plan (e.g. percentage reduction in water use)
- In-period incentive allows you to go over and above this, where positive NPV can be demonstrated and stakeholder support (could be UIOLI)

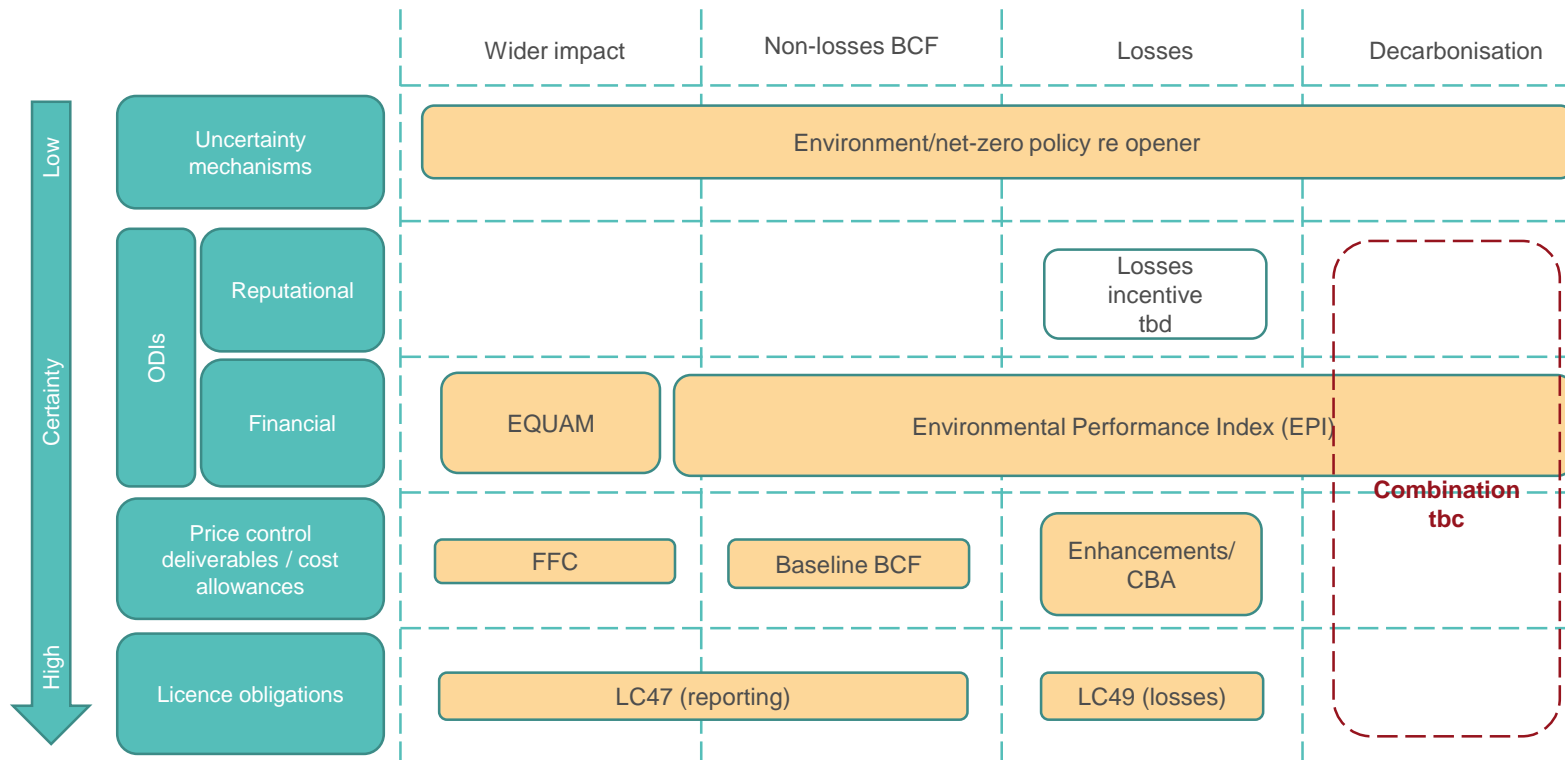
- ✓ Commitment from companies to specific actions ex ante
- ✗ Most efficient set of baseline actions set during business planning may not be the best in-period (e.g. leading practice has changed)
- ✗ More complex arrangement than a pure incentive

Option 2 – incentive includes baseline

- All “harder to quantify” environment related actions are funded through an in-period incentive (could be UIOLI)
- No funded commitments included in base plan

- ✓ Flexibility to take the most efficient actions to reduce BCF in-period
- ✓ Prima-facie simpler than a series of baseline targets + an incentive (although common assessment of initiatives remains complex)
- ✗ May lead to focus on least expensive interventions e.g. outsourcing/offsetting
- ✗ Higher risk at outset

This would form part of a wider set of ED2 outputs to deliver an environmentally sustainable network



Summary

- Our environmental impact can be broken down into four components, we support current proposals on individual mechanisms for Business Carbon Footprint, losses and wider decarbonisation of the economy.
 - Non-losses BCF accounts for a relatively small part of our impact on the environment, nevertheless it should remain a separate part of the ED2 framework.
 - ED1 contained commitments set individually by DNOs and a reputational incentive to publish annual reports, ED2 should add the flexibility to encourage response to developments that occurred after determinations were made.
 - Gas distribution and transmission companies have included carbon footprint and environmental commitments in their business plans.
 - ED2 incentives should reflect the scale of the challenge and the nature of the different ways we affect the environment.
 - We propose working toward a package of outputs that reflects these characteristics.
 - This would form part of a wider set of ED2 outputs to deliver an environmentally sustainable network.
- **Common PCDs** relating to BCF, Losses and wider environmental activities, which are consistent, measurable performance indicators, with a common model/framework to assess investments
 - **Common financial ODI, Environmental Performance Incentive** to reflect performance above/below these baselines for quantifiable activities
 - A flexible **Environmental Qualitative Assessment Measure** of environmental impact, co-created with each DNO's stakeholders to demonstrate further environmental ambition, with an attached financial ODI
 - **Re-opener** to allow for any material cost changes due to changing legal requirements e.g. ban on SF6?

Lunch

Item 3: Stress-test scenarios

Background:

Discussion in initial WG session on whether there was a need for new or amended arrangements in ED2 to facilitate decarbonisation. Group members were asked to contribute scenarios that could occur in ED2 that would require the DNO to carry out work to enable decarbonisation (ie desired outcome) and to stress test existing arrangements to see if desired outcome would be realised.

Questions we asked:

- What is the scenario and what is the desired outcome?
- What in the current arrangements would drive the desired outcome?
- Are there issues with the current arrangements?
- Is an additional/alternative arrangement required?
- If yes, how would Ofgem know that...
 - The desired outcome was achieved on a cost effective basis?
 - Expenditure would adjust to changes in demand growth compared to forecasts?
 - Any additional profit earned by DNO was linked to efficiency improvements or improved service quality (and not eg forecasting error)?

Purpose of today:

Discuss views on whether additional arrangements are required and whether suggestions put forward are appropriate/would result in the desired outcome.

What is the scenario and what is the desired outcome?

- Suggested scenarios set out actions DNOs would need to undertake in ED2 in order to facilitate decarbonisation. **Drivers for DNO action varied:**
 - DNO needs to respond to unforeseen in-period net zero legislative change
 - DNO needs to pull forward ED3,4,5 investment in a particular Local Authority area due to ambition to achieve net zero ahead of Govt targets
 - DNO needs to invest ahead of need/upsized the network/realise a 'touch it once' approach
 - DNO receives connection requests, action will depend on location and timing of connection requests and whether contributory vs non-contributory reinforcement, fault level or transmission level reinforcement is needed
 - Existing customers require service alterations eg EV fast charger etc.

What in the current arrangements would drive the outcome and are there any issues with these arrangements?

- Current mechanisms/arrangements noted included...
 - (Well justified) business plans and appropriate baseline funding
 - Totex incentive mechanism
 - Load related expenditure (LRE) reopener
 - TTQ/C incentive
 - Broad Measure of Customer Service (BMCS) incentive
 - Guaranteed Standards of Performance
- ...But issues with existing arrangements included (many of which relate to investing ahead of need/upsizing the network):
 - Historical benchmarking not appropriate for setting ED2 allowances where upsizing may be appropriate
 - Current arrangements do not encourage a touch once approach
 - Delivering greater level of capacity than is used in the short term will be considered inefficient by Ofgem
 - LRE doesn't accommodate national policy shifts to deliver net zero
 - DNOs must offer customers for minimum cost schemes for new connections not one that delivers longer term benefits
 - Lack of capacity may be blocker as customer unwilling to fund upstream reinforcement

Is an additional/alternative arrangement required? How would Ofgem know that...

- 1. The desired outcome was achieved on cost effective basis?**
- 2. Expenditure would adjust to changes in demand growth compared to forecasts?**
- 3. Any additional profit earned was linked to efficiency improvements or improved quality of service?**

- Suggestions included:
 - DNOs need to submit well-justified plans (incl. through stakeholder engagement) and to carry out plans with baseline funding, use existing mechanisms eg LRE and TIM to drive efficient outcomes. **Additional guidance from Ofgem on necessary level of justification in business plans.**
 1. *'...Companies evidence how plans & activities are efficient and co-ordinated'.*
 2. *'...TIM and delivery mechanisms account for changes in delivery from forecast'.*
 3. *'...Additional uncertainty allowances could be included within DNO Totex allowances under the TIM and therefore subject to customer sharing factors where there is a difference in expenditure.'*
 - **Increased use of UMs incl. suggestions for both within-period and ex post reviews of expenditure**
 1. *'...Demand requirements are being met with no issues/complaints raised'*
 2. *'...Use of volume drivers'*
 3. *'...Benchmarked unit costs and volume driver, as well as TIM sharing factors'*

Questions for discussion:

- Do these proposals sufficiently address the issues set out in the above questions?

Is an additional/alternative arrangement required? How would Ofgem know that...

- 1. The desired outcome was achieved on cost effective basis?**
- 2. Expenditure would adjust to changes in demand growth compared to forecasts?**
- 3. Any additional profit earned was linked to efficiency improvements or improved quality of service?**

- Suggestions included:
 - Additional mechanisms eg **capacity mechanism, a volume driver where company recovers costs for capacity delivered, and not reliant on forecasts.**
 1. *'...Capacity Mechanism approach would decouple the actual solution used to ensure the capacity was available from a proposed solution based on current network capacity'*
 2. *'...Capacity Mechanism approach based on delivered capacity and not reliant on forecasts'*
 3. As above (answer 2)
 - Additional suggestion, when thinking about connections services in particular, for **existing arrangements eg TTQ/C and BMCS to be more focused on types of customer than electrical nature of connection**, particularly where service is related to decarbonisation eg heat pump or EV.

Questions for discussion:

- Do these proposals sufficiently address the issues set out in the above questions?

Questions for discussion:

- Suggestions including baseline funding rely on robust forecasts, how to ensure robust forecasts?
- Suggestions including volume drivers rely on robust and appropriate unit costs, how to ensure this?
- Does increased use of uncertainty mechanisms ensure appropriate balance of risk sharing between companies and customers?
- Various DNOs and Ofgem have been considering the strategic investment issue and developing proposals. Beyond this issue, do other (existing or new) arrangements need to be considered? Eg broadening scope of/amending categorisation of customers under BMCS and TTQ/C. Are there any others?

Suggestions in the table (for amended and new arrangements) centred on how to address issues of anticipatory investment and new connections. The former is being picked up in the OAWG and the latter in the CSVCWG. We propose these issues remain in those groups.

1. DNO needs to invest to enable uptake of EVs to deliver Net Zero/Govt. strategy to decarbonise transport.
2. DNO needs to invest to enable uptake of heat-pumps to deliver Net Zero / Govt. Govt. strategy to decarbonise heat.
3. DNO needs to invest to remove barriers to LCT uptake due to looped service/cut-out risk
4. DNO needs to invest to respond to unforeseen in-period Net Zero legislative change e.g. all off-gas grid customers to receive electric heating subsidies.
5. DNOs need to pull forward ED3,4,5,6 or 7 investment in a particular Local Authority area due to Net Zero ambition sooner than 2050
6. DNO recognises minimum cost scheme will not satisfy aim of 'touch once to 2050' due to predicted growth
7. DNO needs to undertake work in 2028 to enable capacity work programme is not undeliverable in ED3,4,5 etc
8. New large conventional demand customer wants a connection, but they want it in 4 years.
9. A large demand customer wants to get connected in 3 months, but this connection requires contributory reinforcement
10. A large generation customer wants to get connected in 3 months, but this connection requires fault level reinforcement
11. A small demand customer wants to get connected in 3 months, but this connections requires non-contributory reinforcement
12. A customer wants to get connected in 3 months, but this connections requires reinforcement for fault level issues.
13. A customer wants to get connected in 3 months, but this connections requires assessment and possible reinforcement of the Transmission network
14. Customer wants to alter connection eg for upgrade to fast EV charger. New: This could include for example a customer purchasing a second EV.
15. Large scale charging required in areas such as airports/shopping malls