

18 September 2020

Steve McMahon

Ofgem  
Commonwealth House  
32 Albion Street  
Glasgow  
G1 1LH

By email only

Dear Steve

**Re: Call for Evidence on Visibility of Distributed Generation Connected to the GB Distribution Networks.**

We are writing to you in relation to the call for evidence that Ofgem published on 4<sup>th</sup> August 2020 in relation to the visibility of distributed generation. BUUK Infrastructure ("BUUK") is the parent company for the Electricity Network Company Limited ("ENC") and Independent Power Networks Limited ("IPNL") both of whom operate licensed distribution networks across GB. BUUK's licenced network companies adopt distribution networks which generators may be connected to.

We have provided, in line with DCUSA Modification DCP 350, a register of generators which connect to BUUK's networks capable of generating 1MW and above. We are actively engaged with the Open Networks project and broadly support the points that have been set out in their response to the call for evidence. However, we also make the following specific points in relation specifically to our distribution networks and possible benefits and costs that may be associated with more granular (general and temporal) data provision;

- We are able to provide information, as required by DCP 350, down to a lower minimum capacity threshold on a static basis based on the information that we hold from connection agreements with customers. In order to monitor, collect, store and disseminate data on a more temporally granular basis at the current capacity threshold or a reduced minimum capacity we would need to invest significantly in systems and equipment. Whilst it may be appropriate for distributors to fund these investments through price controls, we, as an IDNO, would need to ensure that we are able to recover any investment costs through our relative price control mechanism.
- Whilst we believe that it may be important to consider the whole distribution network on a broad basis, we feel that the benefits to our own, discrete, networks from the provision of more detailed information may be limited. We do, however, recognise that there may be some use to this information being available in the delivery of DSO functions as it enables distributors to make timely decisions. However, the availability of DG information should not mean that DG solutions to network constraints are preferred.
- We think that it is important to ensure that a cost-benefit analysis is produced to ensure that the provision of more granular information is in the best interest of electricity

customers. We believe that Ofgem should play a central role in undertaking this analysis.

We would welcome further engagement in developing any proposals which may arise from the development and believe that as an IDNO we will have a valuable part to play in ensuring the operational resilience of the total electricity system.

Yours sincerely

Dave Overman  
Electricity Networks Director