

Northern Powergrid – Looking Back to 2019-20

About you and your work																															
1. What is the name of your company?	BUUK Infrastructure																														
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 not confidential. We have not completed section 4 as this part is commercially sensitive. We feel that this has no bearing on our comments and as this is commercially sensitive, we do not feel it is appropriate to share this data widely.																														
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 Power Grid																														
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"> <thead> <tr> <th>Type of connection</th> <th>Total number of connections</th> <th>Total MVA of connections</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Metered Demand Connections</td> <td>Low Voltage (LV) Work</td> <td></td> </tr> <tr> <td>High Voltage (HV) Work</td> <td></td> </tr> <tr> <td>HV and Extra High Voltage (EHV) Work</td> <td></td> </tr> <tr> <td>EHV work and above</td> <td></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td rowspan="2">Metered Distributed Generation (DG)</td> <td>LV work</td> <td></td> </tr> <tr> <td>HV and EHV work</td> <td></td> </tr> <tr> <td rowspan="4">Unmetered Connections</td> <td>Local Authority (LA) work</td> <td></td> </tr> <tr> <td>Private finance initiatives (PFI) Work</td> <td></td> </tr> <tr> <td>Other work</td> <td></td> </tr> <tr> <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		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 2019/20								
<i>We want your views on how well the DNOs have engaged with connections stakeholders over the last regulatory year</i>								
5. 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
6. 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
7. Tell us about how the DNO engaged with you: d) What did the DNO do? e) How did the DNO do it? f) Did the DNO have a robust engagement strategy?	Engagement with NPG is primarily via stakeholder workshop events where various people from our IDNO and ICP business are invited. We also have bilateral meetings with their operational teams to discuss connection issues. The structure of their engagement with us seems robust and to have a strategy.							
The DNO's work plan								
8. <i>Objectives:</i> Have you seen the DNOs work plans and the objectives they outline? c) Does it take into consideration your needs? If so, how? d) If it doesn't please explain why.	Yes, we have seen the work plans. However, there are areas that could be improved. For example, there is work that has been carried out with NPG that is relevant to the ICP market which has not been recorded within the plan. Some of the existing actions will also benefit our company in the future.							
9. <i>Actions:</i> Do you think the DNO has delivered its work plan? c) How has the DNO done this? d) If you do not think the DNO has delivered its work plan, please explain why.	Northern Power Grid has delivered on their work plan but the plan itself has not been particularly stretching. This appears to be a common issue across several of the DNOs.							

10. Outputs: Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Did the DNO meet these outputs? Please explain why.	The targets are adequate and have been met but are not stretching.			
Your feedback on the DNOs stakeholder engagement performance				
11. 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>For general day to day work, we do think this is the case as they regularly have stakeholder meetings and do ask the ICP's for their thoughts and feedback. They also hold one to one meetings with the ICPs which we attend and have agreed a number of important changes as a result.</p> <p>We also note that despite all IDNOs requesting that NPG should add the provision of emergency response into the ICE plans, they have refused and are now the only DNO not to offer this as a service. This is disappointing and we feel that this is not offering all customers the best response to faults, particularly when they are across the boundaries between DNO and IDNO and also when the DNO has mistakenly switched off our customers, without prior agreement, resulting in GSOS failures. We also see that this does not appear to reflect well in their development of a DSO regime as all networks need to be working closer together to provide an overall solution for all customers groups.</p> <p>Whilst the DNO's strategy, activities, and outputs have taken into account ongoing feedback, NPG have achieved a number of other important milestones, which have not been highlighted in their report.</p>			
12. How satisfied are you with the DNO's overall engagement performance?	very unsatisfied	not satisfied	satisfied	very satisfied
			x	
13. General feedback – please provide any further feedback on the DNO's 2019/20 engagement performance not covered in your responses above.				

Northern Powergrid – Forward Looking to 2020-21

Section 2: Looking Forward plans 2020/21	
We want your views on what the DNO aims to achieve in the coming year	
1. Are you satisfied that the DNO has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	There is only one mention of IDNO or competition in network ownership within the document. This is typical of the approach that we see from Northern Powergrid regarding network competition.
2. 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?	They have very limited workplans associated with engagement with IDNOs in 2020/2021 so from our perspective their plans are not comprehensive. We are concerned that previous threats of fines have reduced the DNO's willingness to look at stretching targets as they would fear not achieving something. We would rather that they set stretching targets without the threat of financial penalties if they don't reach these goals.
3. Do you consider that the DNO has set relevant outputs that it will deliver during the regulatory year (e.g. key performance indicators, targets, etc.)?	<p>Many of the outputs seem a little vague or involve the publication of generic documentation. This is not a specific issue to this DNO and is a criticism that we would level against the ICE plans. This highlights the concern we have with the current ICE document which would benefit from a fundamental reform.</p> <p>If improvements are identified through the ICE period, there is not a mechanism for the DNO to amend their ICE plan. Equally, if tasks are identified that cannot be completed in a 12-month ICE period, then these are not recorded as the DNO knows they cannot achieve them in a 12-month timescale but knows this will happen over 24-months. As this is beneficial to the customer, it should be being recorded and the ICE process should accommodate this.</p>
4. Would you agree that the DNO's proposed strategy, activities and outputs have been informed and endorsed by a broad and	As with all the DNOs, the plans set out a significant emphasis on the transition to a DSO and the potential implications that this may have. There is however no mention in these plans as to what the impacts will be to us as

inclusive range of connection stakeholders? If not, has the DNO provided robust evidence that it has pursued this engagement?	an IDNO, and the customers that are served on our networks. These are within the proposed DSO areas of activity and may be materially affected. A more joined up, whole energy system approach is required from the DNOs, including how they will work with customers and other Network Operators.
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