

Response template – Incentive on Connections Engagement

- 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 [here](#).
- 1.3. If you have any questions on this document, please contact connections@Ofgem.gov.uk.
- 1.4. **Responses should be sent by e-mail by 28 August 2020 to the address above.**
- 1.5. Unless marked confidential, all responses will be published by placing them in Ofgem's library and on our 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. We ask you to consider this carefully as sharing the comments with the relevant DNO may help improve their performance and ensure a transparent and effective ICE process. Respondents are asked to put any confidential material in the appendices to their responses.
- 1.7. 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 below.
- 1.9. **Please ensure that you indicate the DNO or specific licence area** to which your experiences relate. Each DNO is group and individual DNO is listed on our [here](#). Please note that 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: response template

About you and your work				
What is the name of your company?	Centrica Business Solutions			
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. Please consider carefully before marking any part of your response confidential.	<p>This response is non-confidential and may be published.</p> <p>Any DNO wishing to discuss our response may contact me at helen.stack@centrica.com.</p>			
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 .	ENWL			
What type of connection do you generally require? For each type of connection, how many applications have you made in the past year, and what is the total MVA (Mega Volt Ampere)?	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		

Section 1: Looking Back report 2019/20								
We want your views on how well the DNOs have engaged with connections stakeholders over the last regulatory year								
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.	none	1	2	3	4	5	6	>6
								X
2. 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 Including online		
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>a) + b)</p> <p>As a distributed generator and national energy service provider our staff are largely based outside of ENWL's area. Until the year covered by this report, all ENWL's workshops had been held in its geographic area. This year ENWL held its first Out of Area EHV Workshop in London on 21st November 2019. This was one of the most useful ICE workshops I have been to with an agenda useful to the target audience.</p> <p>This year ENWL has increased the number of online engagement and information giving events for stakeholders. ENWL had started providing more online options before COVID – e.g. a webinar on Ofgem's charging proposals.</p> <p>Despite the positive feedback above we are not happy with outcomes from how Ofgem structured ICE for ED1 because it enabled ENWL to achieve exempted status for so many connections markets segments, including HV & EHV DG customers. ENWL only provides voluntary ICE material for these sectors. This exemption was achieved on the ground that there was competition in connections. The problem is that many of the key stages in the connections process still rely on actions and decisions by ENWL as the monopoly network operator e.g. information provision, Statement of Works processes.</p>							

	<p>c)</p> <p>Yes the DNO had a robust engagement strategy. ENWL provided regular policy and ICE updates. ENWL shared its draft work plans with stakeholders for comments before submission to Ofgem. We had no problem getting hold of ENWL staff via the ICE route if we needed to discuss something.</p>
<p>The DNO's work plan</p>	
<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>Yes</p> <p>a) The Commitments in the 2019/20 Workplan were high-level but did cover main areas of interest for Centrica – clarifying connection requirements e.g. G99, enhanced information provision – including of capacity, information around flexible connections and flexibility procurement. We support the topic-led approach.</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>Largely – at least in relation to the scope of ICE.</p> <p>I can recognise several of the items of the on the voluntary DG HV and mandatory DG LV work plans as having been addressed.</p> <p><u>A&D fees Page 21 Looking Back Report DG LV</u> – Strongly support the work that ENWL has been doing in this area to try and get a more consistent approach across DNOs. This is a point on which Ofgem may have to direct the ENA to take action if all DNOs don't agree to progress adopting a consistent approach.</p> <p><u>Page 20 Looking Back Report DG LV</u> – We would like to see more information shared with stakeholders on the outcomes of the flexibility procurement rounds, in particular information on why when flexibility was offered it was calculated to be an inefficient option. ENWL appears to procure the lowest amount of flexibility amongst all the DNOs and it would be useful to explore the reasons for this more.</p>
<p>6. <i>Outputs:</i> Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate?</p> <p>Did the DNO meet these outputs?</p> <p>Please explain why.</p>	<p>ENWL does not provide a looking back report for DG HV/EHV. So ENWL does not provide looking back metrics or KPIs for HV/EHV.</p> <p>For the DG LV I recognise a number of actions as completed. Several of these read across to the HV/EHV sector. I don't have a reason to disagree with how ENWL has scored its KPIs.</p>

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.			
8. How satisfied are you with the DNO's overall engagement performance? Please tick one box.	Very unsatisfied	not satisfied	satisfied	very satisfied
			X	
9. General feedback – please provide any further feedback on the DNO's 2019/20 engagement performance not covered in your responses above.	<p>We had to seek clarity from the ENWL connections teams around the cancellation options for a connection subject to Statement of Works. The ENWL connections team was helpful in getting this resolved and obtaining the correct figures from National Grid ESO. We are keen to see the delayed CUSC Statement of Works (SOW) mod CMP298 completed so industry can get more clarity on the alternatives to SOW.</p> <p>We welcome the way in which ENWL has adapted its DSO strategy to be in line with Ofgem's approach to DSO functions. This makes it easier to review and understand ENWL's approach.</p> <p>ENWL's heatmap is complex to use, but the background information is really good. This means that it may take more time to carry out a query using it, but this is balanced out because the resulting outputs are very detailed.</p>			

Section 2: Looking Forward plans 2020/21	
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
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 – the commitments for LV and HV/EHV are in line with our needs.
12. Do you consider that the DNO has set relevant outputs that it will deliver during	Yes

the regulatory year (eg key performance indicators, targets, etc.)?	
<p>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?</p> <p>If not, has the DNO provided robust evidence that it has pursued this engagement?</p>	<p>Yes – ENWL claims that almost half of its ICE actions for 2020/21 come from customer feedback. This is good.</p>