

## 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](mailto: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](http://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 <a href="mailto:helen.stack@centrica.com">helen.stack@centrica.com</a>.</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, <b>please use a separate template for each group</b> .	SPEN – all areas			
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					
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>SPEN shared invites for a number of stakeholder events, including connections, but also events relating to DSO and EV uptake.</p> <p>SPEN shared ICE newsletter through the year and published its proposed ICE actions to stakeholders for comment before finalising them.</p> <p>SPEN's ICE reports for this consultation document a robust stakeholder engagement strategy.</p> <p>We have engaged more on SPEN's DSO work – in this area we are frustrated that stakeholder concerns from flexibility service providers do not appear to be taken on board and SPEN continues to promote a strategy of DNO 'overreach' into competitive electricity markets.</p>							

#### The DNO's work plan

4. <i>Objectives:</i> Have you seen the DNOs work plans and the objectives they outline? a) Does it take into consideration your needs? If so, how? b) If it doesn't please explain why.	<p>Yes</p> <p>a) Yes in the areas where SPEN is providing users and potential users with better information, including enhancing DG Heat Maps, and information or tools to help identify the optimum locations for market parties to connect EV charging infrastructure.</p> <p>b) On EV uptake – we support activities to facilitate the mass roll out of EVs, but innovation projects must not risk resulting in a business-as-usual situations where the DNO</p>
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	operates, manages or modulates EV chargers. This activity should be delivered by the market.			
5. <i>Actions:</i> Do you think the DNO has delivered its work plan? <b>a)</b> How has the DNO done this? <b>b)</b> If you do not think the DNO has delivered its work plan, please explain why.	Yes – based on the information presented in the report.			
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.	Yes. Based on the report the DNO has met these outputs.			
<b>Your feedback on the DNOs stakeholder engagement performance</b>				
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?	Partially – in the pure connections area, yes.  I don't feel that SPEN takes on board flexibility provider concerns about the direction of its DSO strategy – where SPEN proposes engaging in DNO or DSO 'overreach'.			
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.				

<b>Section 2: Looking Forward plans 2020/21</b>	
<b>We want your views on what the DNO aims to achieve in the coming year</b>	
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 – based on the evidence presented by SPEN in its report.
11. Do you agree that the DNO has a comprehensive work plan of activities (with	The work plan is very similar to last year and some of these activities could now be

<p>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>considered as BAU – e.g. Flexible Tenders, meeting DNOs ENA commitments. Having said that we are very keen to see the Flexible Tenders process done well and promoted to wider connection stakeholders.</p> <p>Action 11 – Project Charge – smart charging arrangements will need to comply with the requirements of the 2019 EU Electricity Directive. DNOs should not directly manage EV charging. There is not enough information presented under Action 11 to tell if SPENs proposals suggest it is acting in areas where the monopoly DNO should not be present.</p>
<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.)?</p>	<p>Yes</p>
<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? If not, has the DNO provided robust evidence that it has pursued this engagement?</p>	<p>Yes – the DNO has provided evidence that it has pursued this engagement.</p>

