

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 .	WPD – 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?	For this period we were invited to take part in WPD's Customer Connections Steering Group meetings. These are very well run, provide updates on a range of topics and allow stakeholders to feed back on ICE progress during the year.							

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.	Yes – the 2019/2020 work plan contained objectives of interest to us in a number of areas: <ul style="list-style-type: none">Flexibility procurement – both the process and volume of procurement, move to BAUA&D fees – reviewing approach post implementationNetwork data and information improvements, including linked to online mapping
5. <i>Actions:</i> Do you think the DNO has delivered its work plan? a) How has the DNO done this? b) If you do not think the DNO has delivered its work plan, please explain why.	Yes <ul style="list-style-type: none">Flexibility procurement – WPD leads the way among the UK DNOs in terms of flexibility procurement, even though the volume remains low compared to ANM utilisation. WPD's forecast total flexibility procurement for 2020 is 667 MW, against the lowest individual DNO forecast of 13 MW. WPD also developed a flexibility map to show if you are in an area where they are procuring, but

	<p>they are the only DNO doing this and we are not sure why?</p> <ul style="list-style-type: none">• WPDs' adoption of the ENA Standard Flexibility Contract has enabled us to start participating in these tenders by removing some legal hurdles in the previous contracts.• Mapping and data – we welcome system improvements, but there appear to be some problems with the accuracy of the underlying network information.• A&D fees – Although the ICE action was only to review A&D fees post-implementation and provide clarity on WPD's approach, the Looking Back report does not identify the fact that there remains significant differences in how individual DNOs choose to structure A&D fees and DNOs have not managed to come to an agreement on a common approach.• Guidance – WPD publishes very clear Guidance documents.			
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			
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>WPD heat maps are missing some key sites e.g. WPD's Elmdon sub-station which supplies Birmingham Airport, the NEC and Solihull is completely missing from its heatmap.</p> <p>From a situation where we were providing advice to a large site connecting PV, we have concerns that WPD may be over applying G99 requirements by requesting the installation of expensive control and monitoring equipment for sites where there is no net export. the</p>			

	<p>equipment would not have been used but would have made the addition of low carbon technology uneconomic for the site. This was resolved directly with WPD and not escalated via the ICE team.</p> <p>Our main connections team reports WPD employees are the most culturally helpful.</p>
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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?	<p>Broadly, yes.</p> <p>We would like to see improvements to data quality, including ensuring that heat map information is correct. (I missed the most recent Steering Group and had not raised this directly with WPD.)</p> <p>Actions 12 and 22 - linked to information provision for Distributed Generation customers suggest that the relevant data will be made available via an online portal. WPD should consider if this information could be made fully open, in line with Energy Data Best Practice.</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.)?	Yes, although they are largely just that something has been done, rather than a measure of how it has been done.
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?	Yes – WPD has engaged with stakeholders, including through stakeholder steering groups.

