

## 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> .	UKPN			
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>UKPN has sent regular ICE updates with news relevant to connections customers through the year, and held connections events for DG customers. We have also engaged with UKPN via Open Networks.</p> <p>UKPN's ICE report demonstrates that it has a robust engagement strategy.</p>							
<b>The DNO's work plan</b>								
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 – UKPN has the most detailed work plan of all the DNOs.</p> <p>UKPN carried out a prioritisation exercise by sector. Centrica's main interest is as a DER service provider. The DER priorities identified for 2019-20 broadly matched ours. The prioritisation tables are very useful and are a tool that could be copied by other DNOs.</p> <p>Many of the individual initiatives are ones that are in line with our needs.</p>							
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.	<p>Yes.</p> <p>UKPN details a significant number of very specific initiatives that were delivered. The KPI is typically that something is delivered – so it is more quantitative than qualitative – but I am not aware of issues with quality of the deliverables.</p> <p>However, as opposed to the KPI, the detailed description "Summary Status" for each individual initiative is more</p>							

	useful in understanding what was delivered and how this is tailored to the needs of customers.			
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.	<p>Yes.</p> <p>Yes - based on the report and links provided UKPN met the outputs.</p> <p>See also answer to Q5.</p>			
<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?	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.	Capacity maps – our connections team finds UKPN's less usable than others, describing it as more 'clunky' and this meant that they did not always have confidence that they were getting the right information in its outputs.			

<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
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?	Predominately, yes – as for the Looking Back report the Prioritisation Exercise is useful. This not only provides direction for UKPN but also validates it for stakeholders. It is useful for us to see where our concerns/priorities are shared by our peers. For example increasing availability of information and digitisation of information are key priorities

	<p>that we share with others. As well as measures to support the commercial roll-out of EV charging infrastructure.</p> <p>Regarding the development of an ANM solution for demand or load connections, initiative #1.20 – we remain concerned about the proliferation of ANM and how this could interact with the nascent Flexibility Services market, especially if ANM gives DNOs a free option that wipes out the need to procure Flexibility Services. A common DNO response to this is that ANM is associated export connections and therefore not in competition with DSR. Extension of ANM to load does bring them into conflict. Ofgem therefore needs to ensure that this does not undermine commercial provision of flexibility. More positively, we note that UKPN is, under initiative #7.2, looking at market based approach to manage generation constraints in the context of generation flexible connections, and also committing to provide information on probability of curtailment (#6.2).</p> <p>#28.20 – Publication of Appendix G information to customer on request – we support this, but UKPN should consider if this information should be Presumed Open and published without the need for a customer to request it.</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
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 -

