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Ofgem

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2017 Incentives on Connections Engagement (ICE) consultations

Dear Mr Veaney,

Thank you for the opportunity to respond. We recognise that the ICE plans are a useful and effective means for motivating and keeping track of DNO improvements in customer service. Since the ICE plans emerged there has been a general trend towards increased numbers of tools available from DNOs and changes to the way DER customers are managed. There is more that can be achieved going forward and we are keen to continue working with the DNOs to provide direction on where further improvements on service should be made.

Innogy Renewables UK Ltd is a developer, owner and operator of EHV and HV DG projects and this sets the focus of our feedback here. Where we provide particular praise for an initiative we would like these to be adopted by other DNOs. The plans do vary in the extent that they provide detailed KPIs – those that set themselves more ambitious improvements should be given recognition of this by Ofgem.

Yours sincerely,

Nicola Percival
Innogy Renewables UK Limited

WPD response

Looking forward:

- *Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?*

Yes, WPD have collected feedback and created a plan around this to a good standard. We would be happy to provide further input at any time to support WPD in implementing these targets, and others which arise throughout the coming year. As a developer of long-lead time generation projects we particularly appreciate the effort made in including proposals to also improve the service post connection offer acceptance. The quality of service and taking a transparent approach through the whole project lifecycle is important from a customer perspective.

- *Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?*

We have commented on sections of the work plan that we are particularly interested in:

Availability of information

We are very interested in WPD's plan to provide a 'maintenance frequency overview' and the planned availability of historic outage data on the website so that customers can use this data for their own analysis (actions 1.11 – 1.15). The plans to discuss these at the DG Owner/Operator forum and also to publish the information on the website are a good way to ensure all the audience can use the information.

Improved communications are always welcome in an ICE plan – particularly in relation to SoW process. Regarding planned actions 1.27 and 1.29, we are supportive of the timescales committed to here.

We are supportive of actions 1.32 – 1.38; all information that can be available in advance of making an application is useful as it will help customers with designing viable projects.

To ensure a more consistent and joined up approach in dealing with connections across the different DNOs – the DNOs should review and revise the DG Connections Guide to a 'Distributed Energy Systems' Connections Guide which would cover a wider breadth of technologies.

WPD have made no ICE commitments in relation to information provision via webinar/events. We note that other DNOs have, and would request that where WPD do undertake engagement with customers via webinar or other workshop format, that the materials are made available online ASAP for all. Webinars can be recorded as a sure way of engaging with all types of customers. In particular it would be good for those who are connecting to better understand up front what kind of on-going network costs there are during the life-time of their projects. DUoS seminars either via ENA or individual DNOs would be helpful for customers.

We would like to encourage all DNOs to commit to an annual outage plan, regularly updated (quarterly), as the most direct and informative way to keep generators informed of these events. Such a plan would allow for strategic planning by the generators as well as DNOs to efficient operations and well-timed maintenance. Better coordination between transmission and distribution outage cycles would be a welcome objective across all DNO ICE plans.

We would also like to see DNOs voluntarily make commitments regarding the time for delivery of network stability studies – in lieu of this industry may seek related Guaranteed Standards of Performance.

Customer service:

Actions 1.5 – 2.7 are very welcome as it can often be difficult to identify who to speak to, (prior to acceptance of any offer). We would certainly engage in any process to investigate as per action 2.5.

We welcome planned actions 2.8 – 2.11 and 2.12 – 2.16 as communications post-acceptance are exceptionally important to ensuring that all stakeholders in the project are satisfied they know what to expect. Other DNOs have committed to setting out the project timelines at the point of quotation, with a more detailed plan agreed when the quote is accepted. We would like to see all DNOs offer this, with regular updates – at least every 6 months but more often (monthly) at busy times. The frequency of updates can be agreed with the customer at the outset of the project, where increased times of activity which impact the project would necessitate increased communication. This could include significant milestones such as equipment purchase by the DNO, agreement of wayleaves or other land rights, planning documents and commencement of wider off site works as well as the project specific on-site works etc.

Connection offers & agreements:

We are very supportive of WPD's commitment to implement Assessment & Design fees into BAU, once the legislation comes into effect (3.1 – 3.6). Indeed, we would like to see all DNOs commit to this so that customers are informed of the coming change.

Action 3.7 is commendable but is also a legal requirement, so we would expect to see this regardless of inclusion in the ICE plan.

We are supportive of actions 3.8 – 3.11 and 3.12 – 3.15. These actions appear to have benefits in efficiency and improve early availability of information.

We encourage all DNOs to continually assess what types of works can be considered Contestable. SPEN have committed to investigate whether aspects of operational telecommunications works can be considered Contestable in the future. In addition, as we called for last year, greater clarity on cost, information and associated timescales on different quotation options are encouraged. We encourage the following, which would also ideally be aligned across all the DNOs:

- Similar presentation of quotations between DNOs,
- Greater clarity and transparency regarding cost breakdowns (eg: itemised costs of works),
- Flexibility and acceptance of stage payments,
- Clear visual representation of the extent of the network operator's scope of works on site and,
- Earlier confirmation of when prices are fixed.

Legals & consents:

Actions in this category look sensible, particularly the time-concerned actions. We are supportive of movements to improve communications and time efficiency with Land Rights. Action 5.1 is welcomed; we would certainly want to be consulted as part of this review. A more flexible approach by the DNO with regards to wayleaves/easements would be useful.

Storage

We commend WPD for including actions 6.1 – 6.3. Please also see our request under 'information availability' regarding a revised DG Connections Guide.

Queues & capacity management:

We support WPD, and all DNOs, acting in line with recommendations from the DG-DNO Steering Group. Both planned actions regarding queue management pre- and post- acceptance look to be sensible. We would like to engage in any further consultation on these.

Strategic reinforcement & forecasting

Transparent network information provision is imperative to ensure that storage and other flexible technology is developed at appropriate locations that will better facilitate utilisation of the existing network capacity. Access to network information is pivotal for unlocking investment in all forms of flexibility. DNO heat maps and capacity registers are already very welcome on this front. However, to go one step further, DNOs should design and conduct competitive tender for deferring network reinforcement by lower cost smart solutions. There should be regulatory allowance payments awarded to the most competitive solution – either to the network owner for conducting the reinforcement itself or to cover the cheaper costs of the ‘flexible solution’ – whichever is best value for the end consumer.

DSO

We commend WPD for including information relating to the DSO transition in their ICE plan. It is important that stakeholders are aware of the upcoming opportunity to provide their views as part of the Open Networks Project. DNOs consulting with their own customers and collaborating with other DNOs to ensure a joined up approach is taken will be key to achieving a positive transition – and we congratulate WPD on their plan to do as such.

- *Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?*

Yes, in general the work plan gives targets to achieve in each quarter of 2017/18 and how they will consider their targets to be met. We commend WPD’s improvement to KPI setting from last year – away from using attendance figures as a means for success towards outcomes, outputs and satisfaction as a means for measuring success. Clearly some of the components of the commitments are more challenging to achieve than others- missing some at the end of the year will have more impact than missing others. In general KPIs for all the DNOs should be ones that Ofgem can objectively assess performance against.

- *Would you agree that the licensee's proposed strategy; activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?*

WPD have quoted where the commitment to future action has been derived from and this largely looks to be broad and inclusive.

- *Do you consider that the DNO's planned activities and outputs will be sufficient to meet the needs of all types of connection customers, including the particular needs of newer types of connection customers? What other activities should the DNO undertake in this area?*

We are pleased that WPD are seeking to improve the connections process by issuing connection agreements earlier and implementing A&D fees, which will undoubtedly benefit both experienced and new connection customers. In this response we have commended this effort and also called for even greater clarity and guidance in new areas (hybrid storage applications) which would improve WPD's planned activities and outputs.

- *Do you consider that the DNO's planned activities and outputs will be sufficient to meet the needs of customers looking to connect when the networks are constrained? What other activities should the DNO undertake in this area?*

WPD's plans for queue management are commendable and actions resulting from the SoW trial are underway, it appears. WPD face significant challenges with regards to constraints and we support trialling innovative ways of managing this. We have also asked for a stretching target (for all DNOs) regarding the future of constraints management, through build and non-build solutions.

Looking back:

We endorsed the suggested 2016/17 work plans of DNOs last year and hope that they have been followed. We seek an objective and thorough assessment of the 'looking back' reports by Ofgem. The KPIs should allow for Ofgem to make such an assessment of performance, where they do not Ofgem needs to change the KPI in relation to similar commitments for 2017/18.

SSEN response

Looking forward:

- *Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?*

Yes, SSEN have collected feedback and created a plan around this to a good standard. We would be happy to provide further input at any time to support SSEN in implementing these targets, and others which might arise throughout the coming year. As a developer of long-lead time generation projects we particularly appreciate the effort made in including proposals to also improve the service post connection offer acceptance. The quality of service through the whole project lifecycle is important from a customer perspective.

- *Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?*

We have commented on sections of the work plan that we are particularly interested in:

Delivery:

The Customer Charter is a commendable idea, which would be well-supported by indicative timescales where possible. We support British Solar Renewables' comment here that it will need to be kept up-to-date regularly as staffing changes occur.

The planned programme of works to be issued after second payment is very welcome. We would like SSEN to commit to a sensible, regular update of this programme— at least every 6 months but more often (monthly) at busy times. The frequency of updates can be agreed with the customer at the outset of the project, where increased times of activity which impact the project would necessitate increased communication. The frequency can be agreed with the customer. Such a plan, kept properly updated, will ensure that all parties are fully aware of when activities are happening.

We would ask that SSEN commit to implementing Assessment & Design fees once the anticipated legislation is effective, so that customers are informed of the coming change.

Quoting:

Easier to understand quotes will be welcomed. The planned further breakdown of costs is something we particularly advocate, especially for wider works. Such works are subject to the 'second comer' rules which can be an important part of a project's economic case, notwithstanding the greater clarity this would bring to a developer more fully understanding what they are paying for.

Constraints:

Flexible connections being available is key to ensuring that assets do not become stranded as government support schemes come to a close in future years. These should be implemented with urgency.

Transparent network information provision is imperative to ensure that storage and other flexible technology is developed at appropriate locations that will better facilitate utilisation of the existing network capacity. Access to network information is pivotal for unlocking investment in all forms of flexibility. DNO heat maps and capacity registers are already very welcome on this front. However, to go one step further, DNOs should design and conduct competitive tender for deferring network reinforcement by lower cost smart solutions. There should be regulatory allowance payments awarded to the most competitive solution – either to the network owner for conducting the reinforcement itself or to cover the cheaper costs of the 'flexible solution' – whichever is best value for the end consumer.

Information provision:

An 'operational generator forum' is a good way of engaging with generators on a variety of issues – but this will presumably involve generator representatives attending meetings and also cost travel time. An annual outage plan, regularly updated (quarterly), as we suggested last year and call for again this year would be the most direct and informative way to keep generators informed of these events. Better coordination between transmission and distribution outage cycles would be a welcome objective across all DNO ICE plans. The forum could be beneficial, but should not be the main way that any information is shared with stakeholders.

We would also like to see DNOs voluntarily make commitments regarding the time for delivery of network stability studies – in lieu of this industry may seek related Guaranteed Standards of Performance.

We are very supportive of improvements to budget estimates. As with the planned improved quote cost breakdowns this is very important for project economics. We presume that these will be updated as and when new information is available regarding reinforcement and constraints.

Workshops and WebEx sessions are welcome; we would suggest that some of these are recorded (as Northern Powergrid has said they will do) so that customers unable to be present on the day can still benefit from the information. It would be good for those who are connecting to better understand up front what kind of on-going network costs there are during the life-time of their projects. DUoS seminars either via ENA or individual DNOs would be helpful for customers.

To ensure a more consistent and joined up approach in dealing with connections across the different DNOs – the DNOs should review and revise the DG Connections Guide to a ‘Distributed Energy Systems’ Connections Guide which would cover a wider breadth of technologies.

All DNO plans this year should include some information regarding the DSO transition so that stakeholders are aware of the upcoming opportunity to provide their views via the Open Networks Project.

Collaboration:

SSEN collaborating with other DNOs and National Grid to address constraints is something we support. Joint workshops are a good way to do this, however there should also be commitments to following up on actions arising from these – so that National Grid and all DNOs are able to make improvements for the benefit of all network owners and users.

Choice in connections:

We encourage all DNOs to continually assess what types of works can be considered Contestable. SPEN have committed to investigate whether aspects of operational telecommunications works can be considered Contestable in the future. In addition, as we called for last year, greater clarity on cost, information and associated timescales on different quotation options are encouraged. We encourage the following, which would also ideally be aligned across all the DNOs:

- Similar presentation of quotations between DNOs,
- Greater clarity and transparency regarding cost breakdowns (eg: itemised costs of works),
- Flexibility and acceptance of stage payments,
- Clear visual representation of the extent of the network operator’s scope of works on site and,
- Earlier confirmation of when prices are fixed.

- *Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?*

Yes, in general the work plan gives targets to achieve in each quarter of 2016/17 and how they will consider their targets to be met. Some, though, could be better focused. For example, measuring the success of collaborative workshops with other DNOs and National Grid by the number of workshops held is not meaningful. Instead, these could be measured (in the short term) by the actions taken away from workshops and (in the long term) on those actions being satisfactorily carried through to completion. SSEN could be more stretching with the KPIs at times.

Clearly some of the components of the commitments are more challenging to achieve than others- missing some at the end of the year will have more impact than missing others. In general KPIs for all the DNOs should be ones that Ofgem can objectively assess performance against.

- *Would you agree that the licensee's proposed strategy; activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?*

SSEN have quoted where the commitment to future action has been derived from and this largely looks to be broad and inclusive.

- *Do you consider that the DNO's planned activities and outputs will be sufficient to meet the needs of all types of connection customers, including the particular needs of newer types of connection customers? What other activities should the DNO undertake in this area?*

We are pleased that SSEN are seeking to improve clarity in aspects of the connection journey and budget estimates etc., which will undoubtedly benefit both experienced and new connection customers. In this response we have commended this effort and also called for even greater clarity and information provision in key areas which would improve SSEN's planned activities and outputs.

- *Do you consider that the DNO's planned activities and outputs will be sufficient to meet the needs of customers looking to connect when the networks are constrained? What other activities should the DNO undertake in this area?*

We see SSEN's plans to make it possible to request flexible connections as a positive move. This is key to ensuring that assets do not become stranded when government support mechanisms are closed in future years. We have also asked for a stretching target (for all DNOs) regarding the future of constraints management, through build and non-build solutions.

We support the DNOs implementing the ENA milestones into connection offers and agreements, and we also support the upcoming ENA-led work on queue management being implemented as soon as possible after consultation

Looking back:

We endorsed the suggested 2016/17 work plans of DNOs last year and hope that they have been followed. We seek an objective and thorough assessment of the 'looking back' reports by Ofgem. The KPIs should allow for Ofgem to make such an assessment of performance, where they do not Ofgem needs to change the KPI in relation to similar commitments for 2017/18.

Some stand-out areas we will comment on are:

We commend SSEN for giving 30 days' notice to non-domestic customers where planned outages will occur. However we repeat our comment from last year that an annual outage plan, with quarterly updates, should be available so that scheduled outages can coincide with scheduled maintenance on site.

We have had discussions with SSEN in the past, and we commented in our response to last year's ICE, that there is very little information about Transmission Owner Reinforcement Instructions (TORIs) in the public domain. We still seek greater clarity on these work packages and what they entail would be very useful. For example, a web page that is frequently updated (every quarter) and which notifies interested parties by email when updates are available.

We have been pleased this year to see tasks identified in quotes that can be undertaken by ourselves (example given in ICE plan is excavating track). This, along with greater clarity on reinforcement costs in quotations have been particular improvements we have noticed.

SPEN response

Looking forward:

- *Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?*

Yes, SPEN have presented evidence that they collected feedback and have created a plan around this to a good standard. We would be happy to provide further input at any time to support SPEN in implementing these targets, and others which arise throughout the coming year. The work plan contains many commitments which we are pleased to see and support, and we are pleased to see more focus in this year's plan on the overall customer journey – not just on getting customers to the first offer stage. This plan is quite high level, which has the benefit of being easy to understand but it could be amended to offer greater focus than it currently does.

- *Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?*

We have commented on sections of the work plan that we are particularly interested in:

Communication – Customer Journey

Such a tool will be very welcome – particularly as it will give clarity for what to expect from first interest in a potential application being made right through to energisation. We hope that this will be complemented by guidance for how generators should go about making an application for a hybrid generation-storage site. We encourage all DNOs to do this and to collaborate to ensure that this is consistent within and between DNO areas.

Other DNOs are committing to further breakdown of costs in quotes, something we particularly advocate, especially for wider works. Such works are subject to the 'second comer' rules which can be an important part of a project's economic case, notwithstanding the greater clarity this would bring to a developer more fully understanding what they are paying for.

We ask that SPEN set themselves a challenging target for improving the speed of communications and issuing offers. We have encountered frustration in the past in this area.

We would ask that SPEN commit to implementing Assessment & Design fees once the anticipated legislation is effective, so that customers are informed of the coming change.

Communication – External

These commitments are welcome – communication goals across the life cycle of projects are important. We comment on the Land Right communications as part of the Land Rights feedback. To ensure a more consistent and joined up approach in dealing with connections across the different DNOs – the DNOs should review and revise the DG Connections Guide to a ‘Distributed Energy Systems’ Connections Guide which would cover a wider breadth of technologies.

We would also like to see DNOs voluntarily make commitments regarding the time for delivery of network stability studies – in lieu of this industry may seek related Guaranteed Standards of Performance.

All DNO plans this year should include some information regarding the DSO transition so that stakeholders are aware of the upcoming opportunity to provide their views via the Open Networks Project.

Communication – Channels

We are very supportive of this action – alternative channels of information to workshops are an excellent way of engaging with all types of customers. We would recommend that webinars are recorded so that they can be watched back by customers in their own time. (Northern Powergrid has committed to recording webinars and we would encourage other network companies to follow suit). It would be good for those who are connecting to better understand up front what kind of on-going network costs there are during the life-time of their projects. DUoS seminars either via ENA or individual DNOs would be helpful for customers.

Project Management

The wording for the specific action here indicates that such a plan will be agreed at the start of individual projects, but the KPI description suggests that this will instead be a template for typical projects. We would advocate both – the template being publicly available and individual plans for every project being developed bilaterally. An initial version is requested as early in the process as possible (at quotation stage perhaps) and followed by a detailed version upon offer acceptance. This should also be updated regularly. The frequency could change depending on the activity at the time – at a minimum every 6 months, but at busy times around key milestones every month would be beneficial.

Land Rights - information

These commitments are welcome – improved availability of information from the outset and a commitment to monthly updates is something we look forward to.

Flexible Connections

Such connections are key to ensuring that assets do not become stranded as government support schemes come to a close in future years. Future enabled ANM zones are a major part of this – some indication of timescales would be very welcome.

Telecommunications Trial

We are very supportive of SPEN's commitment to assess whether some aspects of this work can be considered Contestable. We encourage all DNOs to assess whether there are more aspects of their work which is currently Non-Contestable, but could be considered as Contestable in future. In addition, as we called for last year, greater clarity on cost, information and associated timescales on different quotation options are encouraged. We encourage the following, which would also ideally be aligned across all the DNOs:

- Similar presentation of quotations between DNOs,
- Greater clarity and transparency regarding cost breakdowns (eg: itemised costs of works),
- Flexibility and acceptance of stage payments,
- Clear visual representation of the extent of the network operator's scope of works on site and,
- Earlier confirmation of when prices are fixed.

Network Planning

Early notification of planned outages to connected customers is very important to smooth operation. We would encourage SPEN to clarify what they mean by 'provide greater visibility of [their] long-term outage plan'. Ideally this would be an annual outage plan (with any longer-term visibility included) which is updated quarterly. Such information allows planned maintenance to be scheduled at the same time and promotes efficiency. The bi-annual workshops are a good idea but they require generator representatives to travel to them – publication of this information with regular updates is a more accessible way of providing this information. Better coordination between transmission and distribution outage cycles would be a welcome objective across all DNO ICE plans.

We would like to have access to the Technical System Model to be able to undertake our own analysis using the data therein. Other DNOs provide this access, SPEN should follow suit.

Transparent network information provision is imperative to ensure that storage and other flexible technology is developed at appropriate locations that will better facilitate utilisation of the existing network capacity. Access to network information is pivotal for unlocking investment in all forms of flexibility. DNO heat maps and capacity registers are already very welcome on this front. However, to go one step fur-

ther, DNOs should design and conduct competitive tender for deferring network reinforcement by lower cost smart solutions. There should be regulatory allowance payments awarded to the most competitive solution – either to the network owner for conducting the reinforcement itself or to cover the cheaper costs of the ‘flexible solution’ – whichever is best value for the end consumer.

- *Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?*

Whilst some commitments have very defined measurable outcomes, other given KPIs are very general and do not necessarily seek to follow up on measuring success. For example, there is disparity where the Land Rights information will be updated monthly but there is a simultaneous lack of commitment to regular updates to publications – such as outage plans and project management plans.

- *Would you agree that the licensee’s proposed strategy; activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?*

SPEN have quoted where the commitment to future action has been derived from and this largely looks to be broad and inclusive.

- *Do you consider that the DNO’s planned activities and outputs will be sufficient to meet the needs of all types of connection customers, including the particular needs of newer types of connection customers? What other activities should the DNO undertake in this area?*

We are pleased that SPEN are seeking to improve clarity in aspects of the connection journey and communications, which will undoubtedly benefit both experienced and new connection customers. In this response we have commended this effort and also called for even greater clarity and information provision in key areas which would improve SPEN’s planned activities and outputs.

- *Do you consider that the DNO’s planned activities and outputs will be sufficient to meet the needs of customers looking to connect when the networks are constrained? What other activities should the DNO undertake in this area?*

We see SPEN’s commitments in relation to flexible connections and Network Planning as a positive move. Flexible connections in particular are key to ensuring that assets do not become stranded when government support mechanisms are closed in future years. We have also asked for a stretching target (for all DNOs) regarding the future of constraints management, through build and non-build solutions.

We support the DNOs implementing the ENA milestones into connection offers and agreements, and we also support the upcoming ENA-led work on queue management being implemented as soon as possible after consultation.

Looking back:

We endorsed the suggested 2016/17 work plans of DNOs last year and hope that they have been followed. We seek an objective and thorough assessment of the 'looking back' reports by Ofgem. The KPIs should allow for Ofgem to make such an assessment of performance, where they do not Ofgem needs to change the KPI in relation to similar commitments for 2017/18.

NPg response

Looking forward:

- *Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?*

Yes, NPg have presented evidence that they collected feedback and have created a plan around this to a good standard. We would be happy to provide further input at any time to support NPg in implementing these targets, and others which arise throughout the coming year.

- *Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?*

We have commented on sections of the work plan that we are particularly interested in:

Provision of information:

We very much support the idea of recording webinars and connections forums (action 1.1). This will allow those unable to attend to get the benefit of hearing the information first hand, and also allow attendees to revisit sections of these events to refresh memory. It would be good for those who are connecting to better understand up front what kind of on-going network costs there are during the life-time of their projects. DUoS seminars either via ENA or individual DNOs would be helpful for customers.

Action 1.3 is definitely something we support, however we feel it would be better suited in the projects phase rather than the connections phase.

Implementing contract milestones will be beneficial for all (action 1.4).

We would like to encourage all DNOs to commit to an annual outage plan, regularly updated, as the most direct and informative way to keep generators informed of these events. Such a plan would allow for strategic planning by the generators as well as DNOs to efficient operations and well-timed maintenance. Better coordination between transmission and distribution outage cycles would be a welcome objective across all DNO ICE plans.

We would also like to see DNOs voluntarily make commitments regarding the time for delivery of network stability studies – in lieu of this industry may seek related Guaranteed Standards of Performance.

To ensure a more consistent and joined up approach in dealing with connections across the different DNOs – the DNOs should review and revise the DG Connections Guide to a ‘Distributed Energy Systems’ Connections Guide which would cover a wider breadth of technologies.

Other DNOs have committed to setting out the project timelines at the point of quotation, with a more detailed plan agreed when the quote is accepted. We would like to see all DNOs offer this, with regular updates – at least every 6 months but more often (monthly) at busy times such as during installation. This could include significant milestones such as equipment purchase by the DNO and commencement of wider works, on-site works etc.

All DNO plans this year should include some information regarding the DSO transition so that stakeholders are aware of the upcoming opportunity to provide their views via the Open Networks Project.

Improving application/delivery

A quick cost calculator for generation connection applications could be a useful tool (action 2.2), but it would need to clearly set out its own limitations. For example, would this account for the potential for SoW?

Technical & commercial developments:

We are very supportive of WPD’s commitment to implement Assessment & Design fees into BAU, once the legislation comes into effect (action 4.1). Indeed, we would like to see all DNOs including NPG to commit to this.

Enabling competition:

We encourage all DNOs to continually assess what types of works can be considered Contestable. SPEN have committed to investigate whether aspects of operational telecommunications works can be considered Contestable in the future. In addition, as we called for last year, greater clarity on cost, information and associated timescales on different quotation options are encouraged. We encourage the following, which would also ideally be aligned across all the DNOs:

- Similar presentation of quotations between DNOs,
- Greater clarity and transparency regarding cost breakdowns (eg: itemised costs of works),
- Flexibility and acceptance of stage payments,

- Clear visual representation of the extent of the network operator's scope of works on site and,
- Earlier confirmation of when prices are fixed.

Innovation:

Actions in this section look to be sensible. We advocate Northern Powergrid to indicate where they might be able to replicate the Drifffield ANM scheme.

The storage commitments are commendable and we would ask Northern Powergrid to go further and publish guidance for how generators should go about making an application for a hybrid generation-storage site. Collaboration between DNOs would ensure that this is consistent within and between DNO areas.

Transparent network information provision is imperative to ensure that storage and other flexible technology is developed at appropriate locations that will better facilitate utilisation of the existing network capacity. Access to network information is pivotal for unlocking investment in all forms of flexibility. DNO heat maps and capacity registers are already very welcome on this front. However, to go one step further, DNOs should design and conduct competitive tender for deferring network reinforcement by lower cost smart solutions. There should be regulatory allowance payments awarded to the most competitive solution – either to the network owner for conducting the reinforcement itself or to cover the cheaper costs of the 'flexible solution' – whichever is best value for the end consumer.

➤ *Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?*

Yes, in general the work plan gives targets to achieve in each quarter of 2017/18 and how they will consider their targets to be met. In general KPIs for all the DNOs should be ones that Ofgem can objectively assess performance against.

➤ *Would you agree that the licensee's proposed strategy; activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?*

NPg have quoted where the commitment to future action has been derived from and this largely looks to be broad and inclusive.

- *Do you consider that the DNO's planned activities and outputs will be sufficient to meet the needs of all types of connection customers, including the particular needs of newer types of connection customers? What other activities should the DNO undertake in this area?*

We are pleased that NPg are planning to improve digital communications and seeking to implement A&D fees, which will undoubtedly benefit both experienced and new connection customers. In this response we have commended NPg's efforts and also called for even greater clarity and information provision in key areas which would improve NPg's planned activities and outputs.

- *Do you consider that the DNO's planned activities and outputs will be sufficient to meet the needs of customers looking to connect when the networks are constrained? What other activities should the DNO undertake in this area?*

NPg commit to sharing information about the ANM scheme in Drifffield but stop short of committing to indicating where/when they might be able to replicate this. We have also asked for a stretching target (for all DNOs) regarding the future of constraints management, through build and non-build solutions.

Looking back:

We endorsed the suggested 2016/17 work plans of DNOs last year and hope that they have been followed. We seek an objective and thorough assessment of the 'looking back' reports by Ofgem. The KPIs should allow for Ofgem to make such an assessment of performance, where they do not Ofgem needs to change the KPI in relation to similar commitments for 2017/18.