Leep Electricity Networks Limited The Greenhouse, MediaCityUK, Salford, M50 2EQ.
Tel: 0345 122 6786

Alex Walmsley
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

By email – flexibility@ofgem.gov.uk

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Dear Alex,

Key enablers for DSO programme of work and the Long Term Development Statement

Thank you for providing us with the opportunity to provide feedback on the proposed reform to the Long-Term Development Statement (LTDS); specifically, the proposal for IDNO's to provide the summary information mandated in Section One of the LTDS FoS and some of the network data mandated in Section Two.

Leep Electricity Networks Ltd is a young IDNO business, mainly operating LV and 11Kv radial and isolated networks. Our strategy so far has been to work with single developers to undertake portrait schemes designed to the requirements of the development to meet the capacity required therefore our networks are not currently under or over capacity. We currently have one site which is 33Kv connected and involves a wider build out programme. However, the wider connections do not currently reside with us and are the responsibility of Peel Holdings and the DNO. Leep Electricity Networks are obliged to design to the minimum cost and therefore do not operate any telemetry on our existing networks as this would increase our pass on costs.

We have considered the questions posed and where we believe we can add value, we have detailed our response below.

LTDS

Question 1: We consider that improvement is required in the visibility of DG and LCTs connected to the distribution network. In addition to DG and LCT connections, can you identify areas for improvement in the current data that is shared in the LTDS?
We do rely on the LTDS in the work we undertake. Without making specific recommendations, it follows that the greater the detail and accuracy of information contained within the DNO's LTDS, the more it assists us.

Question 2: Can you identify areas for improvement in the presentation of network information in the current FoS?
The two most obvious issues are the difficulty in accessing the LTDS due to the requisite cyber-security and the differences between the DNO's in how their respective LTDS are

presented. Ensuring easier access to the LTDS and producing LTDS in a more standard format would be an improvement.

Question 3: The EDTF and others have identified the need to collate and share 11kV and lower voltage network data. Is there value in creating a sharing mechanism for 11kV and LV network data ahead of the expected roll out of network monitoring and telemetry in RIIO-ED2 and the limited data availability in RIIO-ED1?
While we acknowledge the proposal to share 11kV and LV data, our contribution is likely to be limited in such a regard as we do not operate any telemetry on our existing networks as this would increase our pass on costs.

Question 4: Given the complexity of future distribution networks, static data alone may not satisfy user needs. Should the FoS be enhanced to mandate the development of a common network model to allow power system simulation that each licensee must make available for exchange to users and interested parties? If so, what do you consider to be an appropriate standard?
Consistency is beneficial to the IDNO. IDNO's are likely to operate in all of the respective DNO areas. If there is no consistency of approach, it makes it inefficient to understand each model. Potentially, each IDNO could also have its own model. A common network model provides consistency and clarity.

Question 5: From a review of industry publications we consider that interoperable standards will underpin future DSO activities. Should the FoS mandate the adoption of a IEC 61970 CIM and IEC 61968 CIM for Distribution Management, such that data is collated and constructed in a manner similar to WPDs CIM innovation project model? Are these standards mature and what are the likely benefits and costs?
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Question 6: Should the FoS also be retained in its current Microsoft Excel form? Is there value in this format?
Yes, Microsoft Excel is a widely used program and it is sensible to retain this format.

HEAT MAPS

Question 7: Ensuring network information remains accessible is a priority. At present there is no formal requirement for the production of heatmaps. In order to ensure future customer can access the required data, should the scope of the LTDS and FoS be extended to mandate the production of heatmaps?
Given the potential benefit of the use of heatmaps in conjunction with the LTDS and FoS, we consider it would be advantageous for there to be a mandate for the production of heatmaps.

Question 8: Would there be benefit to adopting common guidance or formats on information presentation within heatmaps, including the presentation of technical information and cost information? What are the barriers to its adoption?
As stated in our response to question 2, one of the areas where improvement could be made is in the standardisation of the LTDS. Therefore, it would follow that any other requisite information should be subject to a similar set of common standards.

Question 9: The core focus of the LTDS is to assist users to enter into arrangements with the licensee and evaluate the opportunities for doing so. Should the scope of the heatmaps include other network needs, such as flexibility requirements? What is the best mechanism to notify network users of opportunities to enter arrangements with the licensees?
In line with our response to question 1, we are of the view that it will be a benefit if more information can be included in the heatmaps.

Question 10: On what frequency should these maps be updated? Should they be updated as there are changes to the underlying data or periodically?
It would seem sensible to update heatmaps alongside the annual LTDS publication process.

FORECASTING OF NETWORK NEEDS

Question 11: Is there a need for a common methodology or principles for estimating load growth? What potential role could the D-FES play in informing the load growth forecasts on the LTDS?
There are clear benefits to adopting common methodologies as previously indicated. The DFES should feed in to the LTDS and there would be a benefit to the alignment of these two documents.

Question 12: Are there any lessons that can be learned from other industry documents such as the ETYS and the NG FES?
Other industry documents highlight the benefits of standardisation of format and timescales for production. Having a uniformed approach will, in our view, be of most benefit to not only those who produce the information but those who are reliant upon it.

Question 13: Do you agree that the LTDS should be enhanced to present the key assumptions for network requirements forecasting and the uptake in LCTs, or is this a role better served by the D-FES or other documents?
It is our view that if there is an expectation that all these documents will be produced at the same time with the intention that they complement one another, it is not of particular concern which document should be enhanced.

Question 14: Forecasting tools have been a focus of a number of innovation projects. Are there any mature tools or techniques that could be adopted to enhance the transparency or robustness of the load growth forecasts?
We do not have experience of forecasting tools. However, if there is an expectation that these are to be used in the production of the load growth forecasts, there should again be a standardisation of the forecasting tools and they ought to be made available to all.

IDNO'S AND THE LTDS

Question 15: Do you agree that IDNOs should be issued with a direction to produce a LTDS?
We understand why this would be relevant for larger IDNO's and agree that this would be beneficial to the future development of networks and wider DSO programme however given the current set up of our business and growth strategy we do not believe the information provided by Leep would enable the delivery of the stated goals. We would recommend

parameters being set to define when it would be beneficial for IDNO's to produce a LTDS and to exclude smaller IDNO's.

Question 16: What summary information should IDNOs publish? This is currently found in section one of the LTDS FoS, such as information relating to the design and operation of all voltage levels of the distribution network. Please explain your reasoning.
IDNOs could publish high level summary information relating to the design and operation of all voltage levels of the distribution network. We currently design and plan against industry standards and would not envisage that this information would need updating annually in order to minimise the resource required to produce and maintain this information.

Question 17: What information on network data should IDNOs publish? This is currently found in section two of the LTDS FoS. Please explain your reasoning.
As previously outlined, Leep operates LV and 11Kv radial and isolated networks, undertaking portrait schemes designed to the requirements of the development to meet the capacity required. Our networks are not currently under or over capacity. Many other IDNO's operate in a similar function and therefore the benefit of network data across the IDNO community would be limited.

DELIVERY GOVERNANCE OF THE FORM OF STATEMENT

Question 18: Do you agree with our proposal on how the LTDS delivery body should be convened and governed?
Yes

Question 19: Would you like to nominate an individual to take part in the LTDS working group? Please set out reasons for their inclusion and any qualifying experience the nominated person has to function as a strong contributor to the group.
Yes, we whould like to nominate our Technical Director, Peter Whittaker, to take part in the LTDS working group. Peter would be involved in any future provision of the LTDS and has over 35 years' experience within the IDNO/DNO industry. Peter was part of Ofgem's initial Competition in Connections working group and has a significant insight into the development of the marketplace.

Question 20: What network monitoring parameters would you like to have access to? At what frequency?
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Question 21: What would enhanced 33kV network monitoring enable that cannot be undertaken today?
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Question 22: What would enhanced 11kV network monitoring enable that cannot be undertaken today?
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Question 23: What would enhanced LV network monitoring enable that cannot be undertaken today?

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Question 24: What constraints in data systems architecture do you perceive are limiting network monitoring and visibility?

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FLEXIBILITY TRADING ENABLERS

Question 25: What operational data is most important to prioritise opening up first and why?

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Question 26: How does a lack of access to this data impact the delivery of flexibility to the system?

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FLEXIBILITY DISPATCH AND CONTROL ENABLERS

Question 27: Are there any real or perceived conflicts of interest with DNOs owning and operating ANM platforms at scale? What additional protections could be required for ANM customers?

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Question 28: In order to preserve optionality over ANM scheme operations, what technical and commercial protections, such as technical ring-fencing, may be required?

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Question 29: Please provide real world examples where lacking timely access to usable network data, or regulatory barriers, have limited your ability to provide a DSO function or support service. Please submit any relevant evidence and documentation of examples cited.

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Question 30: Are there any other issues related to enabling DSO that have not been considered that you think are important? Please provide details of your considerations.

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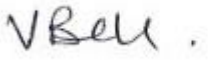
Yours sincerely



Vicky Bell
Regulation and Compliance Manager (Energy)
For Leep Electricity Networks Limited