

James Veaney
Head of Distribution Policy
Ofgem
9 Millbank
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17 August 2016

Dear James

**Open letter consultation on the Incentive on Connections Engagement:
Looking Back reports 2015-16 and Looking Forward plans 2016-17**

Scottish Renewables is the representative body for the renewable energy industry in Scotland, working to deliver a low-carbon, secure energy system, integrating renewable electricity, heat and transport at the lowest possible cost.

With grid capacity across the networks in Scotland severely constrained, grid connection has become a significant barrier to the deployment of renewable energy generation. The distribution network faces high levels of connected generation and further applicants and there are significant upgrades required on the transmission network (beginning at 132kV).

The Incentive on Connections Engagement (ICE) work undertaken by the Scottish distribution network operators (DNOs) has resulted in recognisable improvement in the distributed generation (DG) customer experience, which together with the DG-DNO Steering Group and the DG fora is continuing to remove barriers to market entry for DG, and facilitate engagement and information exchange.

Views on the particular work plans are noted on the following pages, however some cross-cutting themes have emerged:

- The DG-DNO steering group is a useful and effective forum for engagement with the DNOs and trade association. The level of commitment to this group is

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clear. Similarly the annual DG fora provides an excellent means of customer engagement.

- Renewable energy generators are being required to reduce costs quickly as well as work to timescales dictated by third parties – such as revenue support mechanism contracts. DNO commitments to provide clear visibility on costs, reduce costs where possible, facilitate competition and ensure transparency and accountability are welcomed.
- Innovative connections methods – such as Queue Management, flexible and alternative connections are welcome, and we encourage DNOs to continue to work innovatively to enable customer connections. Adequate data provision for these types of connections will be crucial to their success.
- Heat Maps have proven to be a useful tool. Regularly updating these and capacity registers is crucial to provide confidence that information provided is relevant and up-to-date

Though we appreciate Ofgem's desire to seek detailed feedback on these plans, the level of consultation across all DNOs creates challenges in responding to this process. We would encourage Ofgem to consider the best methods of consulting industry while lessening the administrative burden associated with consultation.

We have set out our response to the specified questions below.

We would be happy to take any queries and to contribute to any additional work arising from this consultation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Hannah Smith', written in a cursive style.

Hannah Smith
Policy Officer – Markets and Systems

Form 1: Scottish Power Energy Networks

Question	Response			
About you and your work				
1. What is the name of your company?	Scottish Renewables			
2. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)? Please indicate clearly in your response to the questions below whether your comments refer to the DNO's plans as a whole, or to one of the DNO's licence areas. If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.	1) Scottish Power Energy Networks			
3. What type of connection do you generally require? And for each type of connection, how many connection applications, including total MVA (Mega Volt Ampere) of connections have you made in the past year?	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		

Consultation questions

Section 1: Looking Back report 2015-16

We want your views on how well the DNOs have performed over the last year

<p>1. Are you satisfied that the licensee had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the licensee implemented its strategy? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?</p>	<p>Scottish Power Energy Networks</p> <p>Yes – a stakeholder engagement model was developed which is externally assessed against stakeholder engagement standards. It is structured to deliver a clear and consistent engagement programme and ensuring stakeholder feedback is appropriately fed-into business development.</p> <p>We are of the opinion that this strategy was implemented, with a variety of surveys, workshops, and other communications delivered.</p> <p>As a trade association we have found SPEN to be keen to engage with us and our members, and to communicate well.</p> <p>We recognise that this is an ongoing challenge for the DNOs as the range of stakeholders is continually increasing.</p>
<p>2. Are you satisfied that the licensee had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders? Do you consider that the licensee delivered its work plan? If not, are you satisfied that the licensee has provided</p>	<p>Scottish Power Energy Networks</p> <p>A clear work plan was presented and it is our understanding that the vast majority of actions were completed.</p> <p>In working with us, plans to enable connections were clearly communicated.</p> <p>Issue areas featured in the work plan previously, featured in this work plan – suggesting awareness of industry concerns and needs.</p>

reasonable and well justified reasons?	
3. Do you consider that the licensee's work plan provided relevant outputs (eg key performance indicators, targets etc.)? Are you satisfied that the licensee has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?	Scottish Power Energy Networks Key indicators were clearly presented.
4. Do you agree that the licensee's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders? If not, has the DNO provided reasonable justification?	Scottish Power Energy Networks It is clear that feedback from previous exercises and from dealing with customers has been taken on board, and that this has resulted in a continual drive to improve service for connections customers.
Section 2: Looking Forward plans 2016-17	
<i>We want your views on what the DNOs aim to achieve in the coming year</i>	
5. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	Scottish Power Energy Networks Yes – clear examples of how stakeholder feedback has been used to develop the work plan have been provided.
6. Do you agree that the licensee has a comprehensive work plan of activities (with associated delivery dates)	Scottish Power Energy Networks Yes – a clear and detailed work plan is presented. We welcome the inclusion of an aim to provide more clarity on cost information associated with a connection, in line

<p>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?</p>	<p>with ongoing work on re-introducing upfront assessment and design fees – which has overwhelming industry support.</p> <p>Continuing improvements to information provided on the connections process is welcome, as is the intention to update heat maps and consider including additional information of relevance.</p> <p>We would support any efforts to expand this too, for example considering heat maps for energy storage applications.</p> <p>Given constraints across the network, enabling connections is key to ensuring renewable generation can come forward. We welcome the intention to develop policies for termination of projects and queue management; the implementation of alternative connections where appropriate, and releasing under-utilised network capacity.</p> <p>We also support the intention to roll out the Accelerating Renewables Connections (ARC) project, however we note that the complete roll out of this scheme would involve a variety of actors beyond the DNO.</p> <p>We are pleased to see the intention to progress with a pilot trial of the proposed streamlined Statement of Works process. This presents a clear challenge for the industry and we look forward to the pilot's outcomes.</p> <p>We have also been pleased to see the recognition of the continued need to innovative, and actions to determine policies in areas like battery storage and electric vehicles are prudent.</p>
<p>7. Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?</p>	<p>Scottish Power Energy Networks</p> <p>Detailed KPI's have been presented</p>
<p>8. Would you agree that the licensee's proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive</p>	<p>Scottish Power Energy Networks</p> <p>In the work plan presented there is a clear recognition of the needs of connections customers and the key issues they face in getting connected.</p> <p>Customer 'sources' behind the intended activities are clearly</p>

<p>range of connection stakeholders? If they have not been endorsed, has the licensee provided robust evidence that it has pursued this?</p>	<p>outlined.</p>
<p><i>We also want your views on how DNO plans will address issues for new connections in constrained areas</i></p>	
<p>We have opted to take points 9-13 together.</p> <p>We recognise that for there is a limit to the level of detail that is practical for inclusion in the forward work plans. While we find detail limited on the questions below, we do acknowledge that the plans are clear in aiming to ensure customers are as informed as possible.</p> <p>Our response to previous consultation via the Energy Networks Association, on the presentation of curtailment associated with an ‘Active Network Management’ connection offer, was clear on the importance of the presentation of curtailment data. We believe that data must be presented in a format that is interrogable by a third party on behalf of the customer in order for them to clearly understand the risk profile of the connection and secure the confidence of their investors.</p> <p>Acting transparently to ensure adequate data provision to customers is vital – when considering all types innovative connection models.</p> <p>We find the work plan to be lacking in this area, and would welcome further clarification from the DNOs on their plans for data presentation.</p> <p>Given that Scottish Renewables is not a connection customer, it is difficult for us to comment more specifically on levels of data required for investment decisions.</p>	
<p>9. Where flexible connection offers are available, do you consider that the DNO’s work plan for 2016-17 sufficiently addresses concerns about the uncertainty of curtailment levels? For example, do their plans ensure that stakeholders have access to the data</p>	

they require for an investment decision?	
10. Where consortium connections are available, do you consider that the DNO's work plan for 2016-17 reflect requirements for clear and detailed information about where, how and under what conditions such projects can proceed?	
11. Where consortium connections are available, do you consider that the DNO's work plan for 2016-17 reflect requirements for clear and detailed information about where, how and under what conditions such projects can proceed?	
12. Do you consider that the DNO's work plans include appropriate engagement to ensure that network investment plans are well communicated to stakeholders, including when new capacity will become available?	
13. Do you consider that the DNOs' plans include appropriate activities to improve, where necessary, the provision of information on constrained areas of the	

network to provide better data about where connections may be viable?	
14. Are there particular additional activities or outputs which you consider should be included in the work plan of activities to better facilitate grid connections?	

Form 2: Scottish and Southern Power Distribution

Question	Response																								
About you and your work																									
4. What is the name of your company?	Scottish Renewables																								
5. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)? Please indicate clearly in your response to the questions below whether your comments refer to the DNO's plans as a whole, or to one of the DNO's licence areas. If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.	2) Scottish and Southern Power Distribution																								
6. What type of connection do you generally require? And for each type of connection, how many connection applications, including total MVA (Mega Volt Ampere) of connections have you made in the past year?	<table border="1"> <thead> <tr> <th colspan="2">Type of connection</th><th>Total number of connections</th><th>Total MVA of connections</th></tr> </thead> <tbody> <tr> <td rowspan="4">Metered Demand Connections</td><td>Low Voltage (LV) Work</td><td></td><td></td></tr> <tr> <td>High Voltage (HV) Work</td><td></td><td></td></tr> <tr> <td>HV and Extra High Voltage (EHV) Work</td><td></td><td></td></tr> <tr> <td>EHV work and above</td><td></td><td></td></tr> <tr> <td rowspan="2">Metered Distributed Generation (DG)</td><td>LV work</td><td></td><td></td></tr> <tr> <td>HV and EHV work</td><td></td><td></td></tr> </tbody> </table>	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		
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Consultation questions

Section 1: Looking Back report 2015-16

We want your views on how well the DNOs have performed over the last year

15. Are you satisfied that the licensee had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the licensee implemented its strategy? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	<p>Scottish and Southern Power Distribution</p> <p>Yes –developing a regional structure has allowed for increased communication with stakeholders and efforts have been made to embed stakeholder communication into day to day activity.</p> <p>A structure has been developed to oversee this, including a various steering groups. A variety of engagement activities, including surgeries and events took place.</p> <p>As a trade association we have found SSEPD to be keen to engage with us and our members, and to communicate well.</p> <p>We recognise that this is an ongoing challenge for the DNOs as the range of stakeholders is continually increasing.</p>
16. Are you satisfied that the licensee had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders? Do you consider that the licensee delivered its work plan? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	<p>Scottish and Southern Power Distribution</p> <p>A clear work plan was presented and work undertaken to deliver.</p> <p>In working with us, plans to enable connections were clearly communicated.</p>
17. Do you consider that the	Scottish and Southern Power Distribution

licensee's work plan provided relevant outputs (eg key performance indicators, targets etc.)? Are you satisfied that the licensee has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?	Key indicators were clearly presented.
18. Do you agree that the licensee's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders? If not, has the DNO provided reasonable justification?	Scottish and Southern Power Distribution It is clear that feedback from previous exercises and from dealing with customers has been taken on board, and that this has resulted in a continual drive to improve service for connections customers.
Section 2: Looking Forward plans 2016-17	
<i>We want your views on what the DNOs aim to achieve in the coming year</i>	
19. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	Scottish and Southern Power Distribution yes
20. 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?	Scottish and Southern Power Distribution Yes – a clear and detailed workplan is presented. There is a clear focus on information provision, which we welcome. We support the aim for transparency, both through increased communication, but in plans to provide data – such as indicative Distribution Use of System charges in

<p>If not, has the licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?</p>	<p>advance.</p> <p>We have also been pleased to see the recognition of the continued need to innovative, such as developing guidance on flexible connections, and workshops on active solutions management.</p>
<p>21. Do you consider that the licensee has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?</p>	<p>Scottish and Southern Power Distribution</p> <p>Detailed KPI's have been presented</p>
<p>22. 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?</p>	<p>Scottish and Southern Power Distribution</p> <p>In the work plan presented there is a clear recognition of the needs of connections customers and the key issues they face in getting connected.</p> <p>Customer 'sources' behind the intended activities are clearly outlined.</p>
<p><i>We also want your views on how DNO plans will address issues for new connections in constrained areas</i></p>	
<p>We have opted to take points 9-13 together.</p> <p>We recognise that there is a limit to the level of detail that is practical for inclusion in the forward work plans. While we find detail limited on the questions below, we do acknowledge that the plans are clear in aiming to ensure customers are as informed as possible.</p> <p>Our response to previous consultation via the Energy Networks Association, on the presentation of curtailment associated with an 'Active Network Management' connection offer, was clear on the importance on the presentation of curtailment data. We believe that data must be presented in a format that is interrogable by a third party on behalf of the customer in order for them to clearly understand the risk profile of the connection and secure the confidence of their investors.</p> <p>Acting transparently to ensure adequate data provision to customers is vital – when considering all types innovative connection models.</p>	

We find the work plan to be lacking in this area, and would welcome further clarification from the DNOs on their plans for data presentation.

Given that Scottish Renewables is not a connection customer, it is difficult for us to comment more specifically on levels of data required for investment decisions.

23. Where flexible connection offers are available, do you consider that the DNO's work plan for 2016-17 sufficiently addresses concerns about the uncertainty of curtailment levels? For example, do their plans ensure that stakeholders have access to the data they require for an investment decision?

24. Where consortium connections are available, do you consider that the DNO's work plan for 2016-17 reflect requirements for clear and detailed information about where, how and under what conditions such projects can proceed?

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such projects can proceed?	
26. Do you consider that the DNO's work plans include appropriate engagement to ensure that network investment plans are well communicated to stakeholders, including when new capacity will become available?	
27. Do you consider that the DNOs' plans include appropriate activities to improve, where necessary, the provision of information on constrained areas of the network to provide better data about where connections may be viable?	
28. Are there particular additional activities or outputs which you consider should be included in the work plan of activities to better facilitate grid connections?	