

Annex 1 – Open letter consultation on the Incentive of 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. We would especially welcome responses to the specific questions which we have set out in our consultation and are replicated below.
- 1.3. If you have any questions on this document please contact:

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Head of Connections and Constraint Management
Ofgem, 9 Millbank, London, SW1P 3GE
020 7901 1861
Connections@Ofgem.gov.uk

- 1.4. **Responses should be sent, preferably by e-mail by 17 August 2016 to the address above.**
- 1.5. Unless marked confidential, all responses will be published by placing them in Ofgem's library and on its 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 the reasons for confidentiality. Respondents are asked to put any confidential material in the appendices to their responses.
- 1.7. Next steps: 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.
- 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.

Response template – Incentive on Connections Engagement July 2016

Question	Response												
About you and your work													
1. What is the name of your company?	PowerCon (UK) Ltd												
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.	SP Energy Networks Please note that PowerCon act as grid consultants to a number of developers and ICP's. Within the past year we have actually made very few grid connection applications but are required to act on behalf of their customer base in order to resolve connection problems and issues. PowerCon were also invited to take a seat on the SPEN Consumer Stakeholder Panel by the SPEN Connections Team.												
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?	<table border="1"> <thead> <tr> <th>Type of connection</th> <th>Total number of connections</th> <th>Total MVA of connections</th> </tr> </thead> <tbody> <tr> <td>Metered Demand Connections</td> <td>Low Voltage (LV) Work High Voltage (HV) Work HV and Extra High Voltage (EHV) Work EHV work and above</td> <td>None None None None</td> </tr> <tr> <td>Metered Distributed Generation (DG)</td> <td>LV work HV and EHV work</td> <td>None None</td> </tr> <tr> <td>Unmetered Connections</td> <td>Local Authority (LA) work Private finance initiatives (PFI) Work Other work</td> <td>None None None</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	None None None None	Metered Distributed Generation (DG)	LV work HV and EHV work	None None	Unmetered Connections	Local Authority (LA) work Private finance initiatives (PFI) Work Other work	None None None
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Consultation questions													

Section 1: Looking Back report 2015-16

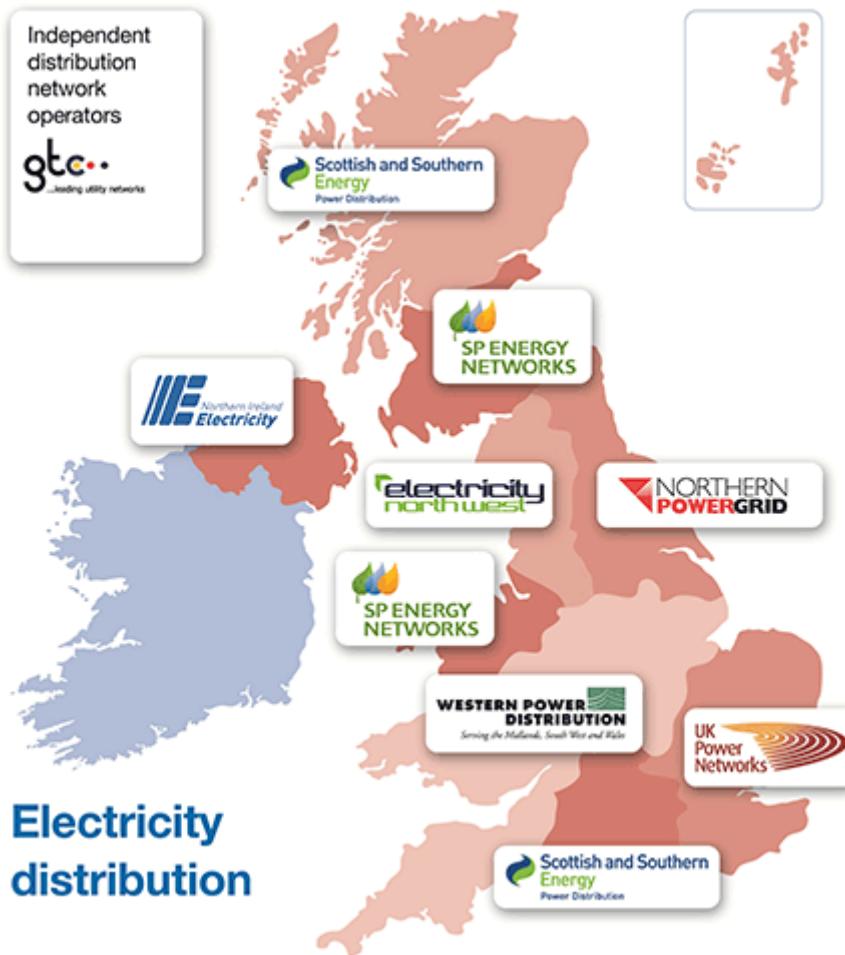
We want your views on how well the DNOs have performed over the last year

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>Yes, SPEN do have a comprehensive engagement strategy.</p> <p>Yes we consider that SPEN implemented that strategy – noting that there remains some work to complete, particularly with regard to connections project delivery.</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 reasonable and well justified reasons?	<p>Yes, we are happy with the plan as produced.</p> <p>Within the 'application process' we believe that SPEN have already taken steps to ensure that expectations are met.</p> <p>With regard to the 'delivery process' we believe that there remain issues with regard to wayleave / land rights that have or are being addressed at a policy level but are taking time to filter down at delivery level.</p> <p>As with all DNO's we have brought inter-trip issues forward for discussion and anticipate that these can be included at a very early stage within the forward work schedule.</p> <p>We would wish to recognise the work that has been undertaken on 'all-inclusive heat maps'.</p>
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?	Yes.
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	Yes to the best of our knowledge.

stakeholders? If not, has the DNO provided reasonable justification?	
Section 2: Looking Forward plans 2016-17	
We want your views on what the DNOs aim to achieve in the coming year	
5. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	Yes. As a participant to the stakeholder panel we are able to confirm that opportunity exists to facilitate and bring forward discussions on connections issues.
6. 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?	Yes, we are happy with the work plan.
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.)?	Yes.
8. 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?	Yes – to the best of our knowledge.
We also want your views on how DNO plans will address issues for new connections in constrained areas	
9. Where flexible connection offers are available, do you consider that the DNO's	Curtailment issues and curtailment levels remain a serious concern and have been the subject of an ENA/DNO consultation and I believe we are awaiting a

<p>work plan for 2016-17 sufficiently address 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?</p>	<p>full and formal communication of the output. This therefore remains a point of concern and contention but we accept that this is not the sole responsibility of this particular DNO.</p>
<p>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?</p>	<p>Following (rather negative) discussions within the DG Steering Group we have chosen, with regret, not to actively seek work on this front. Therefore, we do not have any direct experience relating to this topic.</p>
<p>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?</p>	<p>Splitting grid connection offers in order to facilitate consortia connections, especially community schemes, were discussed at the DG Steering Group and met with opposition from a number of DNO's. We are pleased to report that SPEN were one of the few to embrace the consortium connections issues and, we understand, with a very positive outcome.</p>
<p>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?</p>	<p>Yes we consider that SPEN have been proactive in communicating their work plans.</p>
<p>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?</p>	<p>SPEN should be applauded in that they have devoted significant time and trouble to get their heat maps to be fully inclusive and accurate. We would also applaud the fact that SPEN are prepared to discuss individual project details on a 'one to one basis' when requested.</p>
<p>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?</p>	<p>Our main concerns now relate to delays in the provision of full grid connection offers, including SCADA/Inter-tripping solutions, and the finalised charges and delivery times associated with that solution.</p>

Annex 2 - Map showing DNO licensee areas¹



¹ Image from Electricity Networks Association (ENA)