

## **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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Ofgem, 9 Millbank, London, SW1P 3GE  
020 7901 1861  
[Connections@Ofgem.gov.uk](mailto: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](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 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																																							
<b>About you and your work</b>																																								
1. What is the name of your company?	Viridor Waste Management 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.	Scottish & Southern Power Distribution																																							
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" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><b>Type of connection</b></th> <th style="text-align: center;"><b>Total number of connections</b></th> <th style="text-align: center;"><b>Total MVA of connections</b></th> </tr> </thead> <tbody> <tr> <td><b>Metered Demand Connections</b></td> <td></td> <td></td> </tr> <tr> <td>Low Voltage (LV) Work</td> <td></td> <td></td> </tr> <tr> <td>High Voltage (HV) Work</td> <td style="text-align: center;">1</td> <td style="text-align: center;">0.5</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><b>Metered Distributed Generation (DG)</b></td> <td></td> <td></td> </tr> <tr> <td>LV work</td> <td></td> <td></td> </tr> <tr> <td>HV and EHV work</td> <td style="text-align: center;">5</td> <td style="text-align: center;">32</td> </tr> <tr> <td><b>Unmetered Connections</b></td> <td></td> <td></td> </tr> <tr> <td>Local Authority (LA) work</td> <td></td> <td></td> </tr> <tr> <td>Private finance initiatives (PFI) Work</td> <td></td> <td></td> </tr> <tr> <td>Other work</td> <td></td> <td></td> </tr> </tbody> </table>	<b>Type of connection</b>	<b>Total number of connections</b>	<b>Total MVA of connections</b>	<b>Metered Demand Connections</b>			Low Voltage (LV) Work			High Voltage (HV) Work	1	0.5	HV and Extra High Voltage (EHV) Work			EHV work and above			<b>Metered Distributed Generation (DG)</b>			LV work			HV and EHV work	5	32	<b>Unmetered Connections</b>			Local Authority (LA) work			Private finance initiatives (PFI) Work			Other work		
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## 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>Yes they had a strategy; they were able to deal with my enquiries.</p> <p>Comprehensive or robust?: our issue is in reference to additional MW's being exported from our existing Energy From Waste plant connection, it was considered but due to network reinforcements planned for the Bicester area then our additional export would need to wait until then, planned completion 2019. I have discussed an Active Network Management approach but SSE will not consider until trial schemes have been completed. Yes they did consider how robust is we have something and will need to wait until then.</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 reasonable and well justified reasons?</p>	<p>As explained above, it's a matter of waiting until their works have been completed before our export can be increased</p>
<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?</p>	<p>SSE did provide dates and their reasons and approach, would not say we are satisfied with delivering alternative interim approach until 2019 works completed</p>
<p>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?</p>	<p>I'm not able to comment for broad range only our own experiences</p>

## Section 2: Looking Forward plans 2016-17

### We want your views on what the DNOs aim to achieve in the coming year

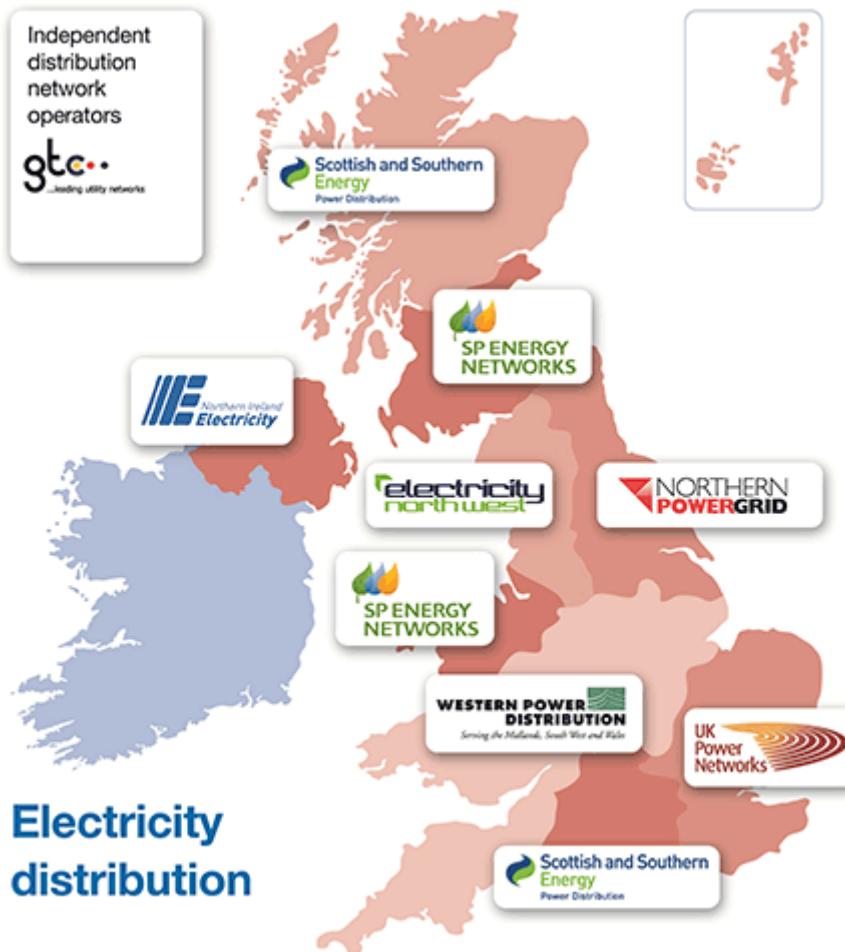
5. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	<p>They have forums arranged, yes this provides broad spectrum feed-back, yet constraints remain.</p> <p>Latest key word is flexibility, yet this remains with extensive time delays</p>
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?	<p>Yes they provided work plan that met their requirements, these unfortunately were not the dates we were hoping for.</p> <p>Yes their reasons were well explained and from their side well-justified, this to me seems to be the catch 22 as our plant will remain unable to support the network – our plant is 24/7 export.</p> <p>Our plant is connected and exporting 26MW, an additional 1MW was applied for but Thermal constraints due to existing Solar Farms require SSE reinforcements.</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.)?	We've accepted the additional 1MW offer for target date of 2019.
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?	Again can only pass comment on our own experiences as outlined above

### 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 work plan for 2016-17 sufficiently addresses concerns about the uncertainty of curtailment levels? For example, do their plans ensure that stakeholders have	No flexible offer has been forthcoming
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access to the data 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?	Again unable to comment as this approach has not been evident for us
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?	Repeat of question 10?
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?	We've not been invited to any engagement seminars, since offer accepted not further communications have been approached
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?	My understanding would be that matters for improvement are being considered but as yet we've not been approached
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?	It would appear that approaches for better managed networks could be considered i.e. our plant is restricted due to existing Solar Farms yet these have operating hour restrictions such as night time, yet no approach to our export increasing at these times?

## Annex 2 - Map showing DNO licensee areas<sup>1</sup>



<sup>1</sup> Image from Electricity Networks Association (ENA)