

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:

James Veaney
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?	Community Energy Scotland																								
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.	SSEPD/SHEPD area																								
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 rowspan="4">Metered Demand Connections</td><td>Low Voltage (LV) Work</td><td></td></tr> <tr> <td>High Voltage (HV) Work</td><td></td></tr> <tr> <td>HV and Extra High Voltage (EHV) Work</td><td></td></tr> <tr> <td>EHV work and above</td><td></td></tr> <tr> <td rowspan="2">Metered Distributed Generation (DG)</td><td>LV work</td><td><50kW</td></tr> <tr> <td>HV and EHV work</td><td>>10MW</td></tr> <tr> <td rowspan="3">Unmetered Connections</td><td>Local Authority (LA) work</td><td></td></tr> <tr> <td>Private finance initiatives (PFI) Work</td><td></td></tr> <tr> <td>Other work</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	<50kW	HV and EHV work	>10MW	Unmetered Connections	Local Authority (LA) work		Private finance initiatives (PFI) Work		Other 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

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?	Yes
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?	Yes
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- SHEPD's documentation in the looking back and looking forward reports was particularly clear. The use of graphics helps break down what can be quite unwieldy documents as well as the split by DG/demand and unmetered connections.
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?	Yes- we have direct experience of SHEPD taking our feedback on board in a number of areas, including outage planning, constraint management and information provision for communities.

Section 2: Looking Forward plans 2016-17

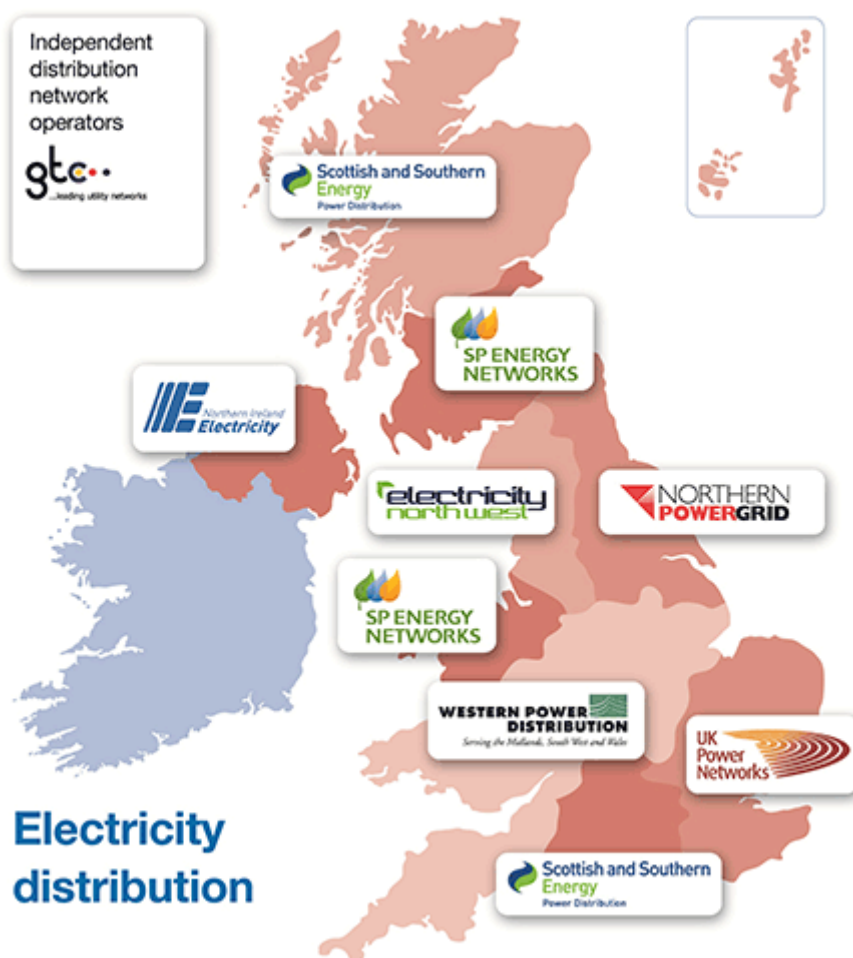
We want your views on what the DNOs aim to achieve in the coming year

5. Are you satisfied that the licensee has a	Yes- SHEPD are using a wide range of types of engagement, from face to
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comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	face, workshops and social media, as well as clear signposting on the website to relevant named contacts.
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 the workplan document shows the number of votes received by stakeholders as well as the delivery dates and specific KPI measures.
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- as evidenced by votes and multiple stakeholder engagement events.
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 access to the data they require for an investment decision?	Yes- SHEPD have committed to providing guidance and hosting workshops on flexible connections, and have significant learning from the operation of the Orkney RPZ. The ACCESS project on Mull which SHEPD have supported through NIA is a good example of where generator control is combined with local demand management to help manage the level of constraint that the generator would otherwise be exposed to. This learning is directly feeding into the suite of options that SHEPD have committed to offering to all customers in constrained areas by the end of this calendar year.
10. Where consortium connections are available, do you consider that the DNO's work plan for 2016-17 reflect requirements for clear and detailed	While this is an approach that SHEPD have facilitated, for example in Glen Lyon, and have developed processes for helping developers identify each other to form prospective consortia, in our experience the process is inherently challenging in the current investment climate, where there is often

information about where, how and under what conditions such projects can proceed?	not enough time to align the interests and timescales of multiple projects. In our view, innovative connections for individual developers combined with strategic investment by the DNO is most likely to deliver additional capacity in the short to medium term.
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?	Yes- SHEPD have a high level of information in their updated heat maps, including jobs that have been quoted but not yet offered. There is a section dedicated to information provision in their DG workplan.
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?	Yes- noted above. Heat maps show indicative level of constraint at GSP, BSP and substation level, with detailed information available that is sufficient for a basic self-assessment of likely capacity and timescales for any additional capacity.
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?	We strongly support the provision of options for transmission constrained projects, and would like to see more detail on what these will be made available to relevant customers in due course. It is very important that the solutions presented are practical and affordable to avoid creating a further barrier. Overall we are supportive of the workplan as an ambitious document that is clearly and accessibly presented.

Annex 2 - Map showing DNO licensee areas¹



¹ Image from Electricity Networks Association (ENA)