

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?	TUSC 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.	ENWL – the entire DNO 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 (Across GB)?	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Type of connection</th> <th style="text-align: center;">Total number of connections</th> <th style="text-align: center;">Total MVA of connections</th> </tr> </thead> <tbody> <tr> <td>Metered Demand Connections</td> <td style="text-align: center;">Low Voltage (LV) Work - High Voltage (HV) Work 6 HV and Extra High Voltage (EHV) Work - EHV work and above -</td> <td style="text-align: center;">- - - - -</td> </tr> <tr> <td>Metered Distributed Generation (DG)</td> <td style="text-align: center;">LV work - HV and EHV work 20</td> <td style="text-align: center;">- - 170</td> </tr> <tr> <td>Unmetered Connections</td> <td style="text-align: center;">Local Authority (LA) work - Private finance initiatives (PFI) Work - Other work -</td> <td style="text-align: center;">- - - -</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 6 HV and Extra High Voltage (EHV) Work - EHV work and above -	- - - - -	Metered Distributed Generation (DG)	LV work - HV and EHV work 20	- - 170	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?	ENWL have a comprehensive engagement strategy. They have appropriately identified stakeholder groups and offer a range of engagement options. Further to the options offered, ENWL should include face-to-face stakeholder engagement that can be requested with the design and delivery engineers as part of their engagement.
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?	Aspects of the work plan were unfortunately limited, in particular the suspension of the release of capacity as a result of the nationwide consultation on capacity release. As a stakeholder it would have been preferable to see ENWL continuing with such a project in order to take the lead. In some cases the deliverables in the looking back lack tangible results for the stakeholder and are instead reported back as having been consulted on.
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?	The KPI and target outcomes need further development. That way the stakeholder has a clear benchmark against which to gauge progress.
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?	It would be preferable if the stakeholder information was categorised to a greater extent than appears to have been done i.e. outlining the diversity of the parties engaging at events Councils, large developers, private landowners, consultants, community groups.

Section 2: Looking Forward plans 2016-17

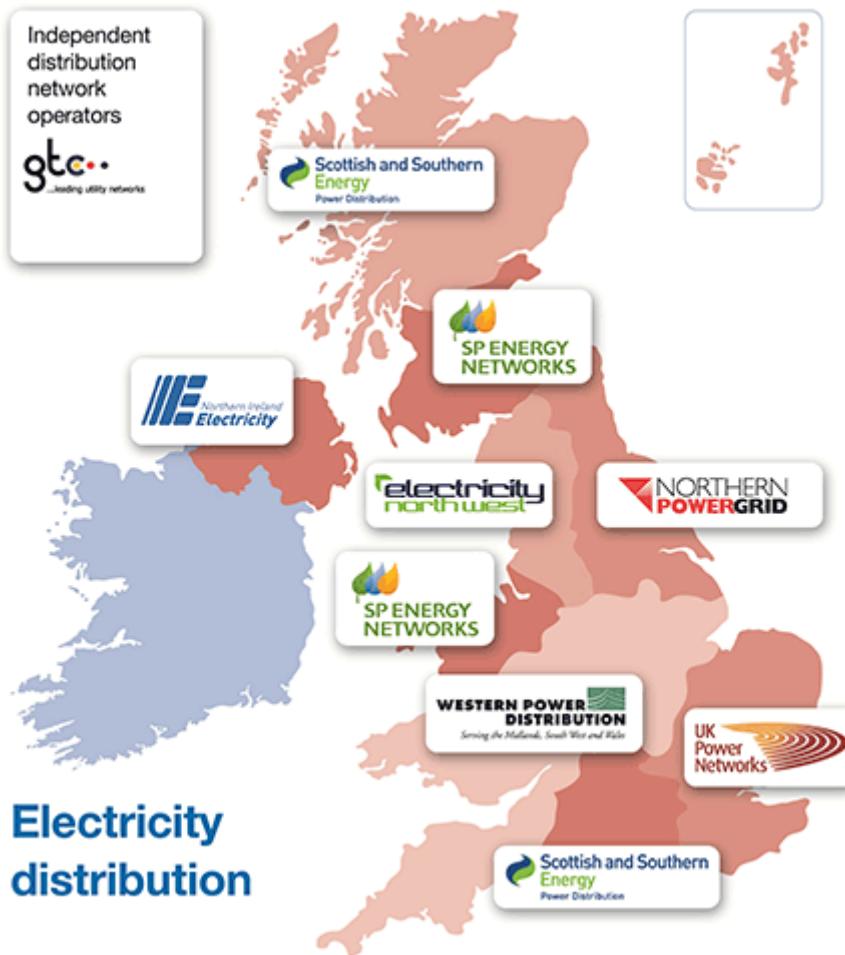
We want your views on what the DNOs aim to achieve in the coming year

5. Are you satisfied that the licensee has a	Identification of the target stakeholder groups is well developed and the
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comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	engagement strategy builds upon the previous one. Again, it would be desirable to expand and include face-to-face meetings as part of stakeholder engagement.
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?	The workplan has expanded upon that of the previous year, though it requires further expansion and greater depth in the information provided and the KPIs need to be developed. In particular where ENWL state they will engage with stakeholders re constrained connections, there should be a target number of stakeholders to engage with to show the depth of engagement.
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.)?	The target outputs require greater substance. In terms of target dates for delivery, it may be preferable to opt for identifying the target quarter rather than the month, this way all 4 quarters could be shown and the deliverables could be readily compared against one another in terms of when services will become available.
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?	Whilst the continual development diagram shown gives a good basis for developing strategies that would benefit stakeholders, and the requests to engage with stakeholders shown a broad approach is taken by ENWL, the attendance at events appears restrictive and without a breakdown of the stakeholder demographic at events it is difficult to determine whether stakeholder endorsement has a broad base.
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?	Engagement on Flexible connections is highlighted as a deliverable for ENWL, though a greater depth of information on how this engagement will be achieved and how success will be gauged is needed.
10. Where consortium connections are available, do you consider that the DNO's work plan for 2016-17 reflect	We do not believe this to be covered by ENWL

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?	We do not believe this to be covered by ENWL
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?	Updates on released capacity mark a significant improvement for ENWL, though again, more substance is required. A target for how frequently such information will be released and an indication of how this capacity can be released to stakeholders based on where they are in the application process.
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?	There does not appear to be a plan from ENWL to improve the provision of information concerning constrained areas ahead of issuing a connection offer. Improvements in this area appear to be limited to the period following provision of the offer
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?	A greater depth and substance to the actual workplan.

Annex 2 - Map showing DNO licensee areas¹



¹ Image from Electricity Networks Association (ENA)