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17 August 2016

Dear Sirs,

**Consultation on ICE**

In response to your consultation letter of 20 July, I wanted to provide the response below.

Firglas is a developer, manager and shareholder of some anaerobic digestion and hydroelectric schemes within SSEPD's network.

Looking Back 2015-16

1. Strategy for engaging with connection stakeholders	Yes, SSEPD has an active strategy and seeks continuous engagement with stakeholders. This subject has received much attention within SSEPD.
2. Work plan	Yes, SSEPD provide ongoing documentation and organise events with various stakeholder groups, from large generators to developers to county councils. There is an ambition to make this material accessible to laymen with the application of plain English.
3. Outputs	Yes, monitoring stakeholder engagement is an evolving art. SSEPD are seeking where possible to quantify the engagement activity. Ofgem as the regulator is of course monitoring this activity and encouraging best practice.
4. Feedback impacting strategy and activities	Yes, during the years I have worked with SSEPD I have noticed an ambition to improve stakeholder engagement. But as a regulated utility business, SSEPD is also acting within a framework provided by Ofgem.

Looking Forward 2016-17

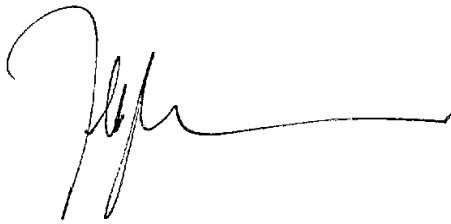
5. Engagement strategy	<p>Yes there are explicit targets to engage with and respond to stakeholders which the DNO is implementing.</p> <p>As I understand it, there is limited opportunity for SSEPD to schedule larger longer term grid reinforcement investments ahead of demand being documented in the form of grid</p>
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	applications. There are some longer range grid investment opportunities which would unlock generation or demand areas.
6. Work plan	Yes, the engagement events are continuing. Whilst it may be hard for the requirements of all connection stakeholders to be met with limited resources, on the whole I have found all parties whether large or small treated fairly and the DNO is seeking to provide some visibility and transparency on process.
7. Relevant outputs	Yes, the DNO is working hard to refine (i.e. make more relevant) the outputs and improve its performance against those targets. However only time will tell if the KPIs were meaningful.
8. Strategy, activities and outputs endorsed by stakeholders	Yes, I believe SSEPD is actively seeking to promote and socialise its connection stakeholder engagement with an improvement in performance as well as targets being refined as a result. The opposite would certainly be untrue.
9. Curtailment uncertainty	This area is emerging at SSEPD. My impression is that the DNO is taking great pains to ensure all stakeholders are treated fairly and provided similar data on which to draw their own conclusions. The data sets will evolve over time as more curtailment offers are connected, so over time the degree of uncertainty should reduce and curtailment becomes the norm.
10. Consortium connections	N/A. Unfortunately I am not familiar with such connections.
11. Visibility of alternative connections in constrained areas	Connection stakeholders require visibility and certainty to proceed with investments. Whilst SSEPD may wish to provide clarity, this is not always possible because of inter-dependencies. Invariably stakeholders in constrained areas will suffer delay which may substantially alter the economics of a project. But I would presume that the DNO must allocate resources on quite a strict basis.
12. Communication of network investment	Thus far, I have not seen any communication about larger scale grid investment which would unlock investment in any particular part of the network. My belief is that DNOs can very seldom deploy grid investment ahead of document demand from stakeholders.
13. Proactive communication about viable connections	To date I have not been made aware of pockets or areas where cost-effective or timely connections might be available. However this is partly my fault as I have seldom posed that question to a DNO. This could open some opportunistic situations!
14. Additional activities or outputs	The DNOs regularly engage with ENA. One subject which should be elaborated is proactive larger scale grid

	<p>reinforcements which should be considered ahead of stakeholder connection requests.</p> <p>The grid is clearly at capacity in many places across the UK, having been designed for centralised generation and distributed demand. The evolution over the past two but mainly last decade means that distributed generation has now fundamentally changed (approx. 25% of MWh produced by renewables) and may continue to evolve, especially as storage is rolled out.</p> <p>Proactive grid reinforcement should achieve cost savings for connecting more distributed generation thereby potentially improving the viability of projects and increasing the scale of implementation.</p>
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I hope you will find these answers useful.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Fredrik Adams', with a long horizontal flourish extending to the right.

Fredrik Adams