

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?	CMS Cameron McKenna LLP																																		
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 and Southern Energy																																		
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 colspan="2">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><td></td></tr> <tr> <td>High Voltage (HV) Work</td><td></td><td></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 rowspan="2">Metered Distributed Generation (DG)</td><td>LV work</td><td></td><td></td></tr> <tr> <td>HV and EHV work</td><td></td><td></td></tr> <tr> <td rowspan="3">Unmetered Connections</td><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> <p>As a lawyer, I typically advise both developers and lender clients on the</p>	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			HV and EHV work			Unmetered Connections	Local Authority (LA) work			Private finance initiatives (PFI) Work			Other work		
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	connection documentation as part of the construction and project financing of small to mid sized onshore renewables installations. I therefore have involvement with SSE in this capacity – negotiating connection documents, and reviewing and reporting on the same for clients, guiding them through any issues or obstacles arising.
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 – I think that SSE have very much had a comprehensive and robust strategy for engaging with connections stakeholders. Through my role described above, I was invited to be part of their Connections Customer Steering Panel, meeting every few months and creating a forum in which developers, consultants and ICPs / IDNOs could raise concerns or queries.
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?	Again – yes. As part of the Connections Customer Steering Panel I was able to review and discuss SSE’s engagement activity, now forming part of their “Incentive on Connections Engagement submission for 2016”. The Panel were given the opportunity to discuss the dates contained with this activity, and to give views on whether or not they were appropriate / placed enough importance on what those developers / consultants considered as key requirements for the DNO. We reviewed previous performance and SSE spoke us through that. With this knowledge, we were able to input – in terms of both the range of activities included, and the delivery dates - realistically into the plan of activities.
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?	As mentioned above, the Panel had the benefit of talking through previous performance with SSE to understand where things had been delayed, and where there was room for improvement. I think this provided a good understanding of setting realistic and relevant outputs, and enabled us to advise on that. Noting incomplete actions, we were able to put a stronger focus on those – and SSE were able to add to their engagement activity to ensure that the outputs and KPI’s were relevant.
4. Do you agree that the licensee’s strategy,	Through a series of meetings with the Connections Customer Steering Panel,

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?	we were able to see development on the strategy – updated before each meeting to take into account feedback from the previous meeting. This is one of the areas in which I think SSE were particularly strong.
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Section 2: Looking Forward plans 2016-17

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

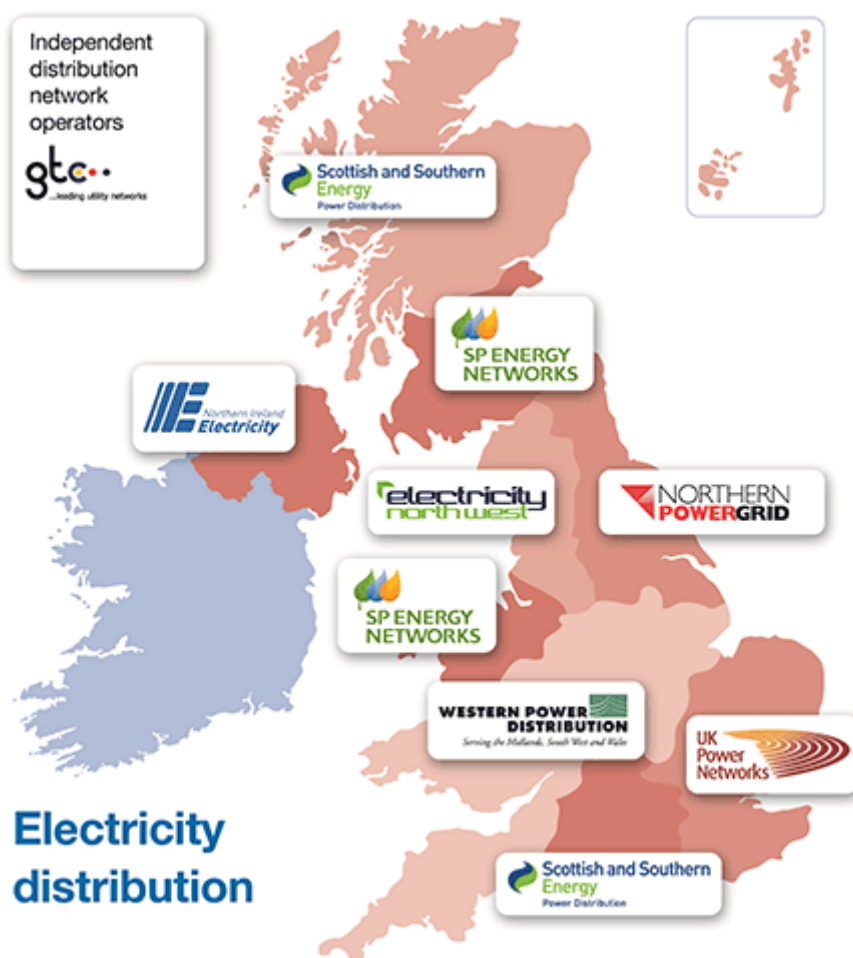
5. Are you satisfied that the licensee has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	The Connections Customer Steering Panel is an ideal way in which SSE can engage with connection stakeholders, and facilitate joint discussions. My understanding is that these are to continue, in which case I would be very satisfied. The strategy, created through discussion at these panel meetings, is comprehensive and robust.
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 – thanks to the opportunity for input and advice from stakeholders, and with the benefit of understanding from previous years, the engagement strategy included in the “Incentive on Connections Engagement submission for 2016” seems to me to be comprehensive, featuring delivery dates as required by these stakeholders.
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 outputs, KPIs and targets have also benefitted from regular stakeholder involvement and advice. Learning from SSE’s previous performance, and their explanation on that, I think that these outputs are ambitious, but realistic.
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?	The Connections Customer Steering Panel meetings which I have attended have been very diverse in terms of stakeholders – including developers, iDNOs, ICPs, technical consultants, and legal advisors, which is great in terms of the invites having been issued, and the interest and enthusiasm shown by stakeholders. As a legal advisor, I’ve been grateful to be involved – able to input in terms of what might be required from a documentation point of view to ensure that connections are seen as robust by project financiers, key to ensure that projects are built out.

We also want your views on how DNO plans will address issues for new connections in constrained areas

In my role as a legal advisor, I don't think the following questions are relevant to me.	
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?	n/a
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?	n/a
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?	n/a
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?	n/a
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?	n/a
14. Are there particular additional activities or outputs which you consider should be	n/a

included in the work plan of activities to better facilitate grid connections?	
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Annex 2 - Map showing DNO licensee areas¹



¹ Image from Electricity Networks Association (ENA)