

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?	Qmulus 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.	SHEPD																																		
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>2</td><td>0.5</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>5-10</td><td>2.5</td></tr> <tr> <td>HV and EHV work</td><td>5-10</td><td>1-30MW</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>Above are best estimates</td><td></td></tr> </tbody> </table>	Type of connection		Total number of connections	Total MVA of connections	Metered Demand Connections	Low Voltage (LV) Work	2	0.5	High Voltage (HV) Work			HV and Extra High Voltage (EHV) Work			EHV work and above			Metered Distributed Generation (DG)	LV work	5-10	2.5	HV and EHV work	5-10	1-30MW	Unmetered Connections	Local Authority (LA) work			Private finance initiatives (PFI) Work			Other work	Above are best estimates	
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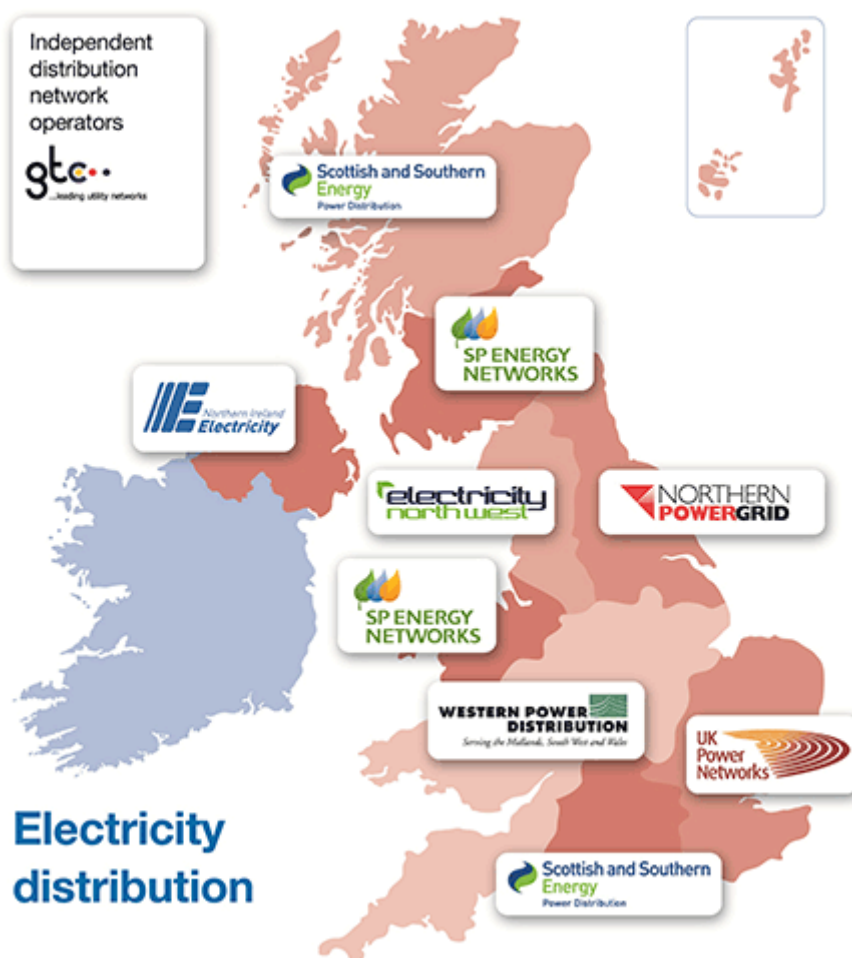
			numbers may be higher	
Consultation questions				
Section 1: Looking Back report 2015-16				
We want your views on how well the DNOs have performed over the last year				
1. Are you satisfied that the licensee had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the licensee implemented its strategy? If not, are you satisfied that the licensee has provided reasonable and well justified reasons?	<p>For wider engaging: reasonable satisfied.</p> <p>I am informed of some of the implementation but rarely have the opportunity to follow up on the wider engagement.</p> <p>On a project specific basis engagement is reasonable. Some issues have been very difficult to deal with. Particularly if SHTPD don't have a clear policy but use the argument that they need to treat all customers equally. This doesn't work if we have a project specific approach which SHEPD say "we will have to offer this to everybody who has applied for a connection in this area".</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>Could to better, but seem to be improving recently.</p> <p>Some things need fining turning. Automated emails sent rapidly at midnight with content which is no longer relevant.</p> <p>What we need is flexible workable solutions not work plans.</p> <p>I started to read SHEPD's Looking Back and Looking Forward submissions just now. It was difficult to find relevant information. When I realised it was over 100 pages long I gave up reading it.</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?	Don't know.			
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	The situation has improved with Consortium approach, ANM etc. It took far too long to get anywhere.			

stakeholders? If not, has the DNO provided reasonable justification?	
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?	Don't know.
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?	It has some, such as ANM. I'm not convinced it has a comprehensive work plan.
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.)?	Don't know.
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?	Partly.
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	Definitely not. Uncertainty kills project development.

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?	<p>The only one I have been involved with is complex due to larger number of generators. This leads to uncertainty with vague costs etc. being provided by SHEPD.</p> <p>I appreciate this is difficult to manage when each developer has the option of progressing or not etc.</p>
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?	<p>Don't know.</p> <p>Is there a list of areas where consortium connections are available? I would phone and ask on a location by location basis.</p>
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?	<p>Too difficult identify quickly in the ICE document.</p> <p>Currently some flexible transmission dates are provided. Transmission certainty would help a large number of our project. there are</p>
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?	<p>I tried looking for the DG work plan on P65. I couldn't find a summary, what was there seem to be hickedly pickety items laid out by a graphic designer, rather than someone who actually uses the information.</p>
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?	<p>SHEPD is getting better slowly. One activity we have been pushing for nearly two years has just fallen in line with a new SHEPD initiative and SHEPD are very supportive. I wonder why it took two years. I get the impression progressing our project will help SHEPD meeting some of it's KPIs.</p> <p>SHEPD are much better than some of the other DNOs.</p> <p>Online project tracking seems a good idea. It should include consents and both progress and target completion dates for all key stages, design, plant procurement, consents, contract placement, line works, etc. etc. up to</p>

	<p>energisation.</p> <p>Some of the ideas in the document are good, other I think exist already and some I can't believe aren't already implemented.</p> <p>This form of feedback is probably best suited to people who are involved at a policy level.</p> <p>We represent developers who do not pay us to be involved in ICE type activities etc. unless it is relevant to a specific project.</p> <p>I'm happy to spend time in occasion providing formal feedback but this method on this feedback form isn't effective for me.</p> <p>We also give feedback to DNO's on a project specific basis when we consider it will help with other projects.</p> <p>We are asked to help with a similar Transmission exercise which involved 2x1hr face to face interviews. This was of much more effective in my view.</p>
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Annex 2 - Map showing DNO licensee areas¹



¹ Image from Electricity Networks Association (ENA)