

James Veaney  
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9 Millbank  
London  
SW1P 3GE

27 July 2017

Dear James

**Open letter consultation on the Incentive on Connections Engagement:  
Looking Back reports 2016-17 and Looking Forward plans 2017-18**

Scottish Renewables is the representative body for the renewable energy industry in Scotland, working to deliver a low-carbon, secure energy system, integrating renewable electricity, heat and transport at the lowest possible cost.

With grid capacity across the networks in Scotland severely constrained, grid connection has become a significant barrier to the deployment of renewable energy generation.

The Incentive on Connections Engagement (ICE) work undertaken by the Scottish distribution network operators (DNOs) has resulted in recognisable improvement in the distributed generation (DG) customer experience, which together with the ENA's DG-DNO Steering Group and the DG fora is continuing to remove barriers to market entry for DG, and facilitate engagement and information exchange.

Views on the particular work plans are noted on the following pages, however some cross-cutting themes have emerged:

- The ENA DG-DNO steering group is a useful and effective forum for engagement with the DNOs, industry and trade associations. Similarly the annual DG fora provides an useful means of customer engagement. We support the willingness of the DNOs to engage with and contribute to these groups.

- Innovative connections methods – such as queue management, flexible and alternative connections are welcome, and we are pleased to see continued work to improve and deliver these connections for customers.
- As we highlighted in our response last year, adequate data provision for these types of connections will be crucial for their success. We welcome moves to enable information sharing, and encourage the swift and comprehensive provision of data.
- Heat maps continue to be valued by connections customers and we support actions outlined to ensure that the information provided is relevant and up-to-date.
- Both Scottish DNOs have made clear attempts to simplify their commitments. This is something we strongly support, not only as it better enables connection customers to engage in this processes, but as it focusses DNO action on critical areas of improvement. We would encourage Ofgem to support a more focussed approach to ICE commitments.

It is important to recognise that ICE commitments exist as part of a wide suite of ongoing work across network policy and regulation – from charging reviews and National Grid’s services reform to DSO transitions and continued network innovation. While this degree of change arguably enhances the need for customer engagement, it must be remembered that DNOs are evolving along with their connections customers. As the role of the DNO changes over time, connection commitments will also change. We would welcome Ofgem monitoring this transition and ensuring ICE criteria is reflective of the role of the DNO/DOS.

We have set out our response to the specified consultations questions below and would be happy to contribute to any additional work arising from this consultation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Gault', is positioned below the text 'Yours sincerely'.

Hannah Smith

**Policy Manager – Markets and Systems**

## Form 1: Scottish Power Energy Networks

Question	Response																						
<b>About you and your work</b>																							
1. What is the name of your company?	<b>Scottish Renewables</b>																						
<p>2. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)?</p> <p>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.</p> <p>If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.</p>	<b>Scottish Power Energy Networks</b>																						
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## Consultation questions

### Section 1: Looking Back report 2016-17

*We want your views on how well the DNOs have performed over the last year*

1. Are you satisfied that the DNO had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the DNO implemented its strategy? If not, are you satisfied that the DNO has provided a reasonable and well-justified explanation?

#### **Scottish Power Energy Networks**

Yes, it is our view that SPEN has implemented a robust stakeholder engagement strategy.

We have attended and been aware of a number of stakeholder engagement events which SPEN has organised – these have been to a high standard; informative, topical, and with room for discussion and debate.

Staff at SPEN have engaged both with us and our member organisations. This was most keenly demonstrated when SPEN worked collaboratively with Scottish Renewables and our member organisations to draft the now published and operational Queue Management Policy.

This involved considerable engagement with our members over several months – including meetings and conference calls- as well as working with our Policy Team on iterations of the policy document.

We found the experience to be hugely positive and beneficial to industry.

<p>2. Are you satisfied that the DNO had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders? Do you consider that the DNO delivered its work plan? If not, are you satisfied that the DNO has provided a reasonable and well-justified explanation?</p>	<p><b>Scottish Power Energy Networks</b></p> <p>A clear work plan was presented, and it is our understanding that the majority of actions were completed.</p> <p>We found plans to be well communicated and we consider the plan delivered.</p> <p>It is clear that through participation in groups such as the ENA DG DNO Steering Group and through the publication of 'thought leading' pieces such as the DNO-DSO transition SPEN is working to advance the policy agenda. However, while it has been helpful to see this work, it does appear to run ahead of the industry (for example, understanding National Grid's plans on service market reform may have been useful prior to the DSO vision consultation).</p> <p>Additionally, many of our members have found it difficult to engage in these consultations. Websites to access documents have proven to be confusing to navigate and have prevented some industry players from effectively responding to consultation. We would welcome further steps from SPEN to improve this interface.</p>
<p>3. Do you consider that the DNO's work plan provided relevant outputs (eg key performance indicators, targets etc.)? Are you satisfied that the DNO has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?</p>	<p><b>Scottish Power Energy Networks</b></p> <p>Outputs such as targets and KPI's seem suitably robust.</p>
<p>4. Do you agree that the DNO'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?</p>	<p><b>Scottish Power Energy Networks</b></p> <p>Yes, it is clear that customer feedback is being considered and is steering the agenda for the Looking Forward 2017/18 report.</p> <p>Continued engagement with industry would further strengthen this.</p>
<p><i>The following two questions refer to the specific areas we discuss in our letter – meeting the needs of all types of connections customers, and connecting when the networks are constrained.</i></p>	

<p>5. Do you consider that the DNO's activities and outputs over the past year were adequate in meeting the needs of all types of connection customers, including the particular needs of newer types of connection customers?</p>	<p><b>Scottish Power Energy Networks</b></p> <p>Yes -Clear examples of how stakeholder feedback has been used to develop commitments and objectives has been provided.</p> <p>SPEN's participation in a variety of groups and fora addressing challenges of the evolving network is welcome and we are confident that the needs of the wide range of connection customers are understood.</p> <p>We do note however, that while interaction with our members on specific projects has been very good, more generalised interaction has been harder to maintain. Feedback from our members suggests that more engagement with industry is required for SPEN to be seen as level with other DNOs.</p>
<p>6. Do you consider that the DNO's activities and outputs over the past year were adequate in meeting the needs of customers looking to connect when the networks are constrained?</p>	<p><b>Scottish Power Energy Networks</b></p> <p>Yes – the Queue Management Policy developed will have a significant impact on getting projects connected to the queue. Likewise, the Statement of Works trials are expected to deliver interesting results.</p> <p>However, for customers to see the full benefit of innovations and trials need to be included in Business as Usual Operation as soon as possible.</p>
<p><b>Section 2: Looking Forward plans 2017-18</b></p>	
<p><i>We want your views on what the DNOs aim to achieve in the coming year</i></p>	
<p>7. Are you satisfied that the DNO has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?</p>	<p><b>Scottish Power Energy Networks</b></p> <p>Yes – a clear strategy is presented.</p>
<p>8. Do you agree that the DNO</p>	<p><b>Scottish Power Energy Networks</b></p>

<p>has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the DNO provided reasonable and well-justified reasons? What other activities should the DNOs do?</p>	<p>Yes – the work plan of activities is comprehensive.</p> <p>We particularly support steps set out to tackle issues surrounding information provision on land rights and telecommunications, as these are well-known stumbling blocks for industry.</p> <p>Many of the activities set out are focussed on communication. While we appreciate that this is hugely important, we would argue that some of the activities set out (website improvements for example) should be categorised as business as usual improvement activities – and that plans in the report should focus on more challenging strategic issues.</p> <p>Adopting lessons learned from trials and integrating new innovative approaches into Business as Usual (such as the ARC trial, and lessons that will be learned from Statement of Works trials) will be crucial to improve customer connections and to develop the network. It is vital that DNOs are supported in adopting lessons learned as quickly as possible.</p>
<p>9. Do you consider that the DNO has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?</p>	<p><b>Scottish Power Energy Networks</b></p> <p>Yes.</p>
<p>10. Would you agree that the DNO’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 DNO provided robust evidence that it has pursued this?</p>	<p><b>Scottish Power Energy Networks</b></p> <p>Yes.</p>
<p><i>The following two questions refer to the specific areas we discuss in our letter – meeting the needs of all types of connections customers, and connecting when the networks are constrained.</i></p>	
<p>11. Do you consider that the DNO’s planned activities and outputs will be sufficient to meet the needs of all types</p>	<p><b>Scottish Power Energy Networks</b></p> <p>Yes – particularly if Statement of Works trials are adopted and further ANM zones materialise.</p>



<p>of connection customers, including the particular needs of newer types of connection customers? What other activities should the DNO undertake in this area?</p>	<p>We would note that customer needs are continually evolving, and SPEN will best understand and meet those needs through continual engagement with stakeholders.</p>
<p>12. Do you consider that the DNO's planned activities and outputs will be sufficient to meet the needs of customers looking to connect when the networks are constrained? What other activities should the DNO undertake in this area?</p>	<p><b>Scottish Power Energy Networks</b></p> <p>We welcome the commitments on flexible connections and statement of works processes, and are hopeful these will have a real impact on customer's looking to connect to a constrained network.</p> <p>Information provision will be critical to the success of these connections. We support the intention to provide greater visibility of outage plans and network planning, but would urge SPEN to continue discussions with customers about the levels of data provision that will enable the customer to make the investment decisions which will progress the project.</p>

## Form 2: Scottish and Southern Electricity Networks

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<p>5. Which DNO's ICE submission is your response related to (see Annex 2 for DNO map)?</p> <p>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.</p> <p>If you wish to provide a response to the ICE submission of more than one DNO, please use a separate template for each DNO.</p>	<b>Scottish and Southern Electricity Networks</b>																	
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## Consultation questions

### Section 1: Looking Back report 2016-17

*We want your views on how well the DNOs have performed over the last year*

<p>13. Are you satisfied that the DNO had a comprehensive and robust strategy for engaging with connections stakeholders? Do you consider that the DNO implemented its strategy? If not, are you satisfied that the DNO has provided a reasonable and well-justified explanation?</p>	<p><b>Scottish and Southern Electricity Networks</b></p> <p>Yes – SSEN has shown a clear strategy in engaging with stakeholders, including, for example, holding ‘Connections Customer Steering Panel Events’ and clearly communicating their regional structure and giving key staff contacts.</p> <p>SSEN has engaged with a wide range of stakeholders, clearly implementing this strategy.</p> <p>We have found SSEN to be very proactive in engaging with us and our membership, including through very active participating in our industry events.</p> <p>While SSEN has not contributed to the wider policy discussion (such as on DSO transitions) as readily as other DNOs, work on flexible connections has been very well received and feedback suggests that our members find staff at SSEN to be available and approachable.</p>
<p>14. Are you satisfied that the DNO had a comprehensive work plan of activities (with associated delivery dates) to meet the requirements of its connections stakeholders?</p>	<p><b>Scottish and Southern Electricity Networks</b></p> <p>Yes – a clear work plan was presented and work undertaken to deliver this.</p> <p>In work with us, SSEN’s plans and objectives were clearly</p>

<p>Do you consider that the DNO delivered its work plan? If not, are you satisfied that the DNO has provided a reasonable and well-justified explanation?</p>	<p>communicated.</p>
<p>15. Do you consider that the DNO's work plan provided relevant outputs (eg key performance indicators, targets etc.)? Are you satisfied that the DNO has delivered these outputs? If not, do you view the reasons provided to be reasonable and well justified?</p>	<p><b>Scottish and Southern Electricity Networks</b></p> <p>Yes – objectives and KPIs were clear and seemed robust.</p>
<p>16. Do you agree that the DNO'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?</p>	<p><b>Scottish and Southern Electricity Networks</b></p> <p>It is clear that SSEN has listened to connections stakeholders, taking feedback into account. Increased engagement and an excellent variety of customer events demonstrate a continual drive to improve service for connections customers.</p>
<p><i>The following two questions refer to the specific areas we discuss in our letter – meeting the needs of all types of connections customers, and connecting when the networks are constrained.</i></p>	
<p>17. Do you consider that the DNO's activities and outputs over the past year were adequate in meeting the needs of all types of connection customers, including the particular needs of newer types of connection customers?</p>	<p><b>Scottish and Southern Electricity Networks</b></p> <p>Yes -clear examples of how stakeholder feedback has been used to develop commitments and objectives has been provided.</p> <p>SSEN's participation in a variety of groups and fora addressing challenges of the evolving network is welcome and we are confident that the needs of the wide range of connection customers are understood.</p> <p>SSEN has been very proactive in working with us and our membership, and we look forward to that continuing.</p>
<p>18. Do you consider that the DNO's activities and outputs over the past year were</p>	<p><b>Scottish and Southern Electricity Networks</b></p> <p>Yes – for example, participation in the ENA's DG DNO Steering Group led to SSEN's progression milestones being</p>

adequate in meeting the needs of customers looking to connect when the networks are constrained?	<p>adopted as Business as Usual across all UK DNOs, helping to manage connection queues.</p> <p>However, for customers to see the full benefit innovations and trials need to be included in Business as Usual Operation as soon as possible.</p>
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**Section 2: Looking Forward plans 2017-18**

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

19. Are you satisfied that the DNO has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	<p><b>Scottish and Southern Electricity Networks</b></p> <p>Yes – a clear strategy is presented.</p>
20. Do you agree that the DNO has a comprehensive work plan of activities (with associated delivery dates) that will meet the requirements of its connection stakeholders? If not, has the DNO provided reasonable and well-justified reasons? What other activities should the DNOs do?	<p><b>Scottish and Southern Electricity Networks</b></p> <p>We welcome SSEN’s move to dramatically simplify its commitments for 2017/18. This not only makes it easier for customers to engage with this process, but it signals a clear desire for SSEN to focus on areas which can deliver real benefit to connection customers.</p> <p>Particularly relevant to this question is the commitment to ‘Choice in Connections’ and in providing every new customer with an offer for a flexible connection – a very welcome move.</p>
21. Do you consider that the DNO has set relevant outputs that it will deliver during the regulatory year (eg key performance indicators, targets, etc.)?	<p><b>Scottish and Southern Electricity Networks</b></p> <p>Yes</p>
22. Would you agree that the DNO’s proposed strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of	<p><b>Scottish and Southern Electricity Networks</b></p> <p>Yes – SSEN have been engaging noticeably with our sector, helping to inform their decisions.</p>

<p>connection stakeholders? If they have not been endorsed, has the DNO provided robust evidence that it has pursued this?</p>	
<p><i>The following two questions refer to the specific areas we discuss in our letter – meeting the needs of all types of connections customers, and connecting when the networks are constrained.</i></p>	
<p>23. Do you consider that the DNO’s planned activities and outputs will be sufficient to meet the needs of all types of connection customers, including the particular needs of newer types of connection customers? What other activities should the DNO undertake in this area?</p>	<p><b>Scottish and Southern Electricity Networks</b></p> <p>Yes – particularly through the commitments to Information Provision and on flexible connections/information sharing among flexible connection customers.</p> <p>We would note that customer needs are continually evolving, and if SSEN continue to engage as they have been doing, they should be well placed to understand these concerns as they evolve.</p>
<p>24. Do you consider that the DNO’s planned activities and outputs will be sufficient to meet the needs of customers looking to connect when the networks are constrained? What other activities should the DNO undertake in this area?</p>	<p><b>Scottish and Southern Electricity Networks</b></p> <p>Yes – the move to offer flexible connections as an option for all customers is an excellent step to modernising the system and allowing customers to get connected in constrained areas. We very much welcome this step. However, the success of these connections very much depend on the availability of information allowing a customer to make an investment decision and progress a project – so commitments to information sharing are key here.</p> <p>We welcome the commitments to collaborate with other DNOs and National grid.</p>