

ICE Team
Ofgem
10 South Colonnade
Canary Wharf
E14 4PU

20 July 2018

Dear Sir/Madam

**Open letter consultation on the Incentive on Connections Engagement:
Looking Back reports 2017-18 and Looking Forward plans 2018-19**

Scottish Renewables is the representative body for the renewable energy sector in Scotland, working to grow a sustainable industry which delivers secure supplies of low-carbon, clean energy for heat, power and transport at the lowest possible cost. We represent around 270 organisations ranging from large suppliers, operators and manufacturers to small developers, installers and community groups, and companies right across the supply chain.

In order to meet our climate change targets, the Scottish Government Energy Strategy and the Committee on Climate Change Renewables Power Scenario envisage a doubling of current renewables deployment by 2030¹². 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:

¹ <http://www.gov.scot/Publications/2017/12/5661/0>

² <https://www.theccc.org.uk/publication/reducing-uk-emissions-2018-progress-report-to-parliament/>

- The ENA DG-DNO steering group is a useful and effective forum for engagement with the DNOs, industry and trade associations. 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.
- Many of the actions set out are focussed on communication. While we appreciate that this is very important, we believe 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.

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 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/DSO.

Similarly, there is a volume of consultation and feedback-loops generated as result of this work. While we understand the need for network operators and other stakeholders to receive feedback, it is very challenging to resource this work. Any efforts to streamline this would be welcome.

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,

<p>3. Tell us about how the DNO engaged with you</p> <p>a) What did the DNO do?</p> <p>b) How did the DNO do it?</p> <p>c) Did the DNO have a robust engagement strategy?</p>	<p>Scottish Power Energy Networks</p> <p>SPEN have been able to identify and validate their stakeholders business priorities and capture emerging issues/themes across the industry</p> <p>SPEN have engaged with us and our member organisations through a variety of mechanisms. These include, but are not limited to:</p> <ul style="list-style-type: none"> - Workshops - Stakeholder Panels - Face to face meetings - Joint DNO connections events - Attendance at Scottish Renewables conferences/ events <p>It is our view that SPEN has implemented a robust stakeholder engagement strategy.</p>
<p>The DNO's work plan</p>	
<p>4. <i>Objectives:</i> Have you seen the DNOs work plans?</p> <p>a) Does it take into consideration your needs? If so, how?</p> <p>b) If it doesn't please explain why</p>	<p>Scottish Power Energy Networks</p> <p>The actions identified in the Looking Back report 2017/18 were based on feedback from stakeholder engagement and considered the concerns of the industry.</p> <p>SPENs work plans have been well communicated via newsletters and various industry events. SPEN have also attended a meeting with Scottish Renewables members specifically to discuss their ICE plans.</p>
<p>5. <i>Actions:</i> Do you think the DNO has delivered its work plan?</p> <p>a) How has the DNO done this?</p> <p>b) If you do not think the DNO has delivered its work plan, please explain why</p>	<p>Scottish Power Energy Networks</p> <p>Following a programme of regular engagement with industry, various actions were identified and progress was tracked against appropriate KPIs.</p> <p>A clear work plan was presented, and it is our understanding that these have all been completed.</p>
<p>6. <i>Outputs:</i> Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why</p>	<p>Scottish Power Energy Networks</p> <p>Outputs such as targets and KPI's seem suitably robust.</p>
<p>Your feedback on performance</p>	

7. Do you think the DNO's strategy, activities and outputs have taken into account ongoing feedback from broad and inclusive range of connections stakeholders?	<p>Scottish Power Energy Networks</p> <p>It is clear that customer feedback is being considered and is steering the agenda for the Looking Forward 2018/19 report.</p> <p>Continued engagement with industry would further strengthen this.</p>			
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8. How satisfied are you with the DNO's overall performance?	very unsatisfied	not satisfied	satisfied	very satisfied
			X	

9. General feedback	<p>Scottish Power Energy Networks</p> <p>It is clear that SPEN 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>Of particular note was their collaboration with industry in making it easier to connect after SPEN relaxed rules around the requirement to produce a Statement of Works for PV installations under 200kW. This decision by SPEN will have a significant impact on the business case for small to medium solar installations in Scotland.</p> <p>SPEN has been proactive in working with us and our membership, and we look forward to that continuing. However, given our members interact with multiple DNOs, the volume of engagement events can be onerous, particularly for some of our smaller members. We're keen that SPEN and Scottish and Southern Energy Networks (SSEN) continue to carry out joint engagement events and organise alternative modes of communication such as webinars and video tutorials.</p>			
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Section 2: Looking Forward plans 2018/19

We want your views on what the DNO aims to achieve in the coming year

10. Are you satisfied that the DNO has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	<p>Scottish Power Energy Networks</p> <p>Yes – a clear strategy is presented.</p>
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<p>11. 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 licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?</p>	<p>Scottish Power Energy Networks</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>12. 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>Scottish Power Energy Networks</p> <p>Yes</p>
<p>13. Would you agree that the DNO 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?</p>	<p>Scottish Power Energy Networks</p> <p>Yes</p>

Form 2: Scottish and Southern Energy Networks

Question	Response
About you and your work	
1. What is the name of your company?	Scottish Renewables
2. Which DNO's ICE submission is your response related to?	Scottish and Southern Energy Networks
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?	N/A
Consultation questions	
Section 1: Looking Back report 2017/18	
<i>We want your views on how well the DNOs have performed over the last regulatory year</i>	
<i>Your engagement with the DNO</i>	
1. How many DNO stakeholder engagement events have you been invited to this year? (This can include engagement outside official events)	none 1 2 3 4 5 6 >6
2. How many DNO Stakeholder events have you been to? This can also include meetings outside of official engagement events	none 1 2 3 4 5 6 >6
3. Tell us about how the DNO engaged with you a) What did the DNO do? b) How did the DNO do it c) Did the DNO have a robust engagement strategy?	Scottish and Southern Energy Networks SSEN have been able to identify and validate their stakeholders business priorities and capture emerging issues/themes across the industry SSEN have engaged with us and our member organisations though a variety of mechanisms. These include, but are not limited to:

	<ul style="list-style-type: none"> - Workshops - Stakeholder Panels - Face to face meetings - Joint DNO connections events - Attendance at Scottish Renewables conferences/ events <p>It is our view that SSEN has implemented a robust stakeholder engagement strategy.</p>
The DNO's work plan	
<p>4. Objectives: Have you seen the DNOs work plans?</p> <p>a) Does it take into consideration your needs? If so, how?</p> <p>b) If it doesn't please explain why</p>	<p>Scottish and Southern Energy Networks</p> <p>The actions identified in the Looking Back report 2017/18 were based on feedback from stakeholder engagement and consider the concerns of the industry.</p> <p>SSENs work plans have been well communicated via newsletters and various industry events. SSEN have also attended a meeting with our members specifically to discuss their ICE plans.</p>
<p>5. Actions: Do you think the DNO has delivered its work plan?</p> <p>a) How has the DNO done this?</p> <p>b) If you do not think the DNO has delivered its work plan, please explain why</p>	<p>Scottish and Southern Energy Networks</p> <p>Following a programme of regular engagement with industry, various actions were identified and progress was tracked against appropriate KPIs.</p> <p>A clear work plan was presented, and it is our understanding that the majority of these have been completed.</p>
<p>6. Outputs: Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Please explain why</p>	<p>Scottish and Southern Energy Networks</p> <p>Outputs such as targets and KPI's seem suitably robust.</p>
Your feedback on performance	
<p>7. Do you think the DNO's strategy, activities and outputs have taken into account ongoing feedback from broad and inclusive range of connections stakeholders?</p>	<p>Scottish and Southern Energy Networks</p> <p>Yes, it is clear that customer feedback is being considered and is steering the agenda for the Looking Forward 2018/19 report.</p> <p>Continued engagement with industry would further strengthen this</p>

8. How satisfied are you with the DNO's overall performance?	very unsatisfied	not satisfied	satisfied	very satisfied
			X	

9. General feedback	<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>Of particular note, has been their partnership with industry on notification of outages. In response to concern over grid outages adversely affecting Hydro power plant operations, Scottish Renewables hosted a round-table discussion with representatives from SSEN. As a result, SSEN are actively working on a new internal framework to communicate the timing of essential outage periods.</p> <p>SSENs engagement with our members on this issue has been appreciated. Whilst outage planning is not part of the connection process, improvements to the outages framework helps customers make the most of their connection. We would request that outage planning and similar issues which impact how a customer is able to use their connection is incorporated into future work plan commitments.</p> <p>SSEN has been proactive in working with us and our membership, and we look forward to that continuing. However, given our members interact with multiple DNOs, the volume of engagement events can be onerous, particularly for some of our smaller members. We're keen that SSEN and Scottish Power Energy Networks (SPEN) continue to carry out joint engagement events and organise alternative modes of communication such as webinars and video tutorials.</p>
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Section 2: Looking Forward plans 2018/19

We want your views on what the DNO aims to achieve in the coming year

10. Are you satisfied that the DNO has a comprehensive and robust strategy for engaging with connection stakeholders and facilitating joint discussions where appropriate?	<p>Scottish and Southern Energy Networks</p> <p>Yes – a clear strategy is presented.</p>
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<p>11. 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 licensee provided reasonable and well-justified reasons? What other activities should the DNOs do?</p>	<p>Scottish and Southern Energy Networks</p> <p>Yes – the work plan of activities is comprehensive.</p> <p>In work with us, SSEN’s plans and objectives were clearly communicated.</p>
<p>12. 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>Scottish and Southern Energy Networks</p> <p>Yes</p>
<p>13. Would you agree that the DNO 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?</p>	<p>Scottish and Southern Energy Networks</p> <p>Yes</p>