

ICE Team
Ofgem
10 South Colonnade
Canary Wharf
E14 4PU

22 July 2019

Dear Sir/Madam

Response: Consultation on the Incentive on Connections Engagement

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 260 organisations ranging from large suppliers, operators and manufacturers to small developers, installers and community groups, and companies right across the supply chain.

Quick and efficient connections of renewable generation to our electricity networks will be critical to meeting our 'net zero' ambitions. With grid capacity across the networks in Scotland severely constrained, grid connection has become a significant barrier to the deployment of renewable energy generation in recent years. Scottish Renewables has worked closely with the DNOs, helping to shape their connections solutions in this landscape.

The Incentive on Connections Engagement (ICE) work undertaken by the Scottish distribution network operators (DNOs) over recent years has resulted in recognisable improvements in the distributed generation (DG) customer experience, which together with the ENA's DER Connections 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:

- Innovative connections methods – such as queue management, flexible and alternative connections are welcome, and we are pleased to see continued

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work to improve and deliver these connections for customers. It is critical that these solutions are rolled out as businesses as usual, and that regulation does not impede that.

- 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 under ICE. This is something we strongly support, not only as it better enables connection customers to engage in these 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.
- ICE has been regulated in a way which has encouraged granular activity to be captured. We believe this has impeded fuller industry engagement and has not always led to the best use of resources. While we appreciate that granular activities are very important, we believe that some of the activities often set out as part of ICE (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.
- Both Scottish DNOs have delivered exceptionally strong programmes of stakeholder engagement, which we commend. We find DNOs to be responsive to industry, and we as Scottish Renewables enjoy a strong working relationship with the DNOs. The efforts undertaken by DNO staff to implement ICE commitments and requirements are noticeable.
- We do believe that Ofgem however needs 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, and that stakeholder engagement requirements under ICE are proportionate to the volume of work ongoing in the field.
- Similarly, there is a volume of consultation and feedback-loops generated as result of ICE. While we understand the need for network operators and other stakeholders to receive feedback, it is very challenging to resource this work

during a time of such fundamental change. 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,



Hannah Smith
Senior Policy Manager
Scottish Renewables

Response – Incentive on Connections Engagement – SSEN

About you and your work	
1. What is the name of your company?	Scottish Renewables
2. Is your response confidential? Please explain which parts and why. For a fair process, we prefer the DNOs to be able to respond to any comments made, particularly if they are negative. So please consider carefully before marking any part of your response confidential.'	No.
3. Which DNO's ICE submission is your response related to? If you wish to provide a response to the ICE submission of more than one DNO group, please use a	SSEN (We have submitted a separate response for SPEN).

<p>separate template for each group.</p>			
<p>4. What type of connection do you generally require?</p> <p>For each type of connection, how many connection applications, including total MVA (Mega Volt Ampere) of connections have you made in the past year?</p>	<p>Type of connection</p> <p>None – Scottish Renewables is a trade association, representing over 260 organisations working to deliver Scotland’s renewable energy industry.</p>	<p>Total number of connections</p>	<p>Total MVA of connections</p>
<p>Metered Demand Connections</p>	<p>Low Voltage (LV) Work</p>		
	<p>High Voltage (HV) Work</p>		
	<p>HV and Extra High Voltage (EHV) Work</p>		
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<p>Unmetered Connections</p>	<p>Local Authority (LA) work</p>		
	<p>Private finance initiatives (PFI) Work</p>		
	<p>Other work</p>		

Section 1: Looking Back report 2018/19

We want your views on how well the DNOs have engaged with connections stakeholders over the last regulatory year

<p>1. How many of the DNO’s stakeholder engagement events have you been invited to this year? (This can include engagement outside official events.) Please tick a box.</p>	<p>none</p>	<p>1</p>	<p>2</p>	<p>3</p>	<p>4</p>	<p>5</p>	<p>6</p>	<p>>6</p>
								<p>X</p>
<p>2. How many DNO Stakeholder events have you been to? This can also include meetings outside of official engagement events. Please tick a box.</p>	<p>none</p>	<p>1</p>	<p>2</p>	<p>3</p>	<p>4</p>	<p>5</p>	<p>6</p>	<p>>6</p>
								<p>X</p>

<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>a) SSEN has clearly worked to form a strong relationship with Scottish Renewables, allowing us and our industry membership to engage readily. SSEN has a strong events programme, which is key to enabling us and our members to engage, learn and discuss key issues. SSEN was also a visible participant in a number of key industry events, such as All Energy and the Scottish Renewables Hydropower Conference. We have been pleased to see SSEN engage directly with us, through taking up speaking slots at conferences and attending meetings with our membership (such as on outages).</p> <p>b) Direct B2B relationships have been part of this, with a number of meetings between SSEN and Scottish Renewables staff building a strong working relationship. Additionally, we – and our members – were in receipt of emails and newsletters. Publications and consultation responses were well advertised, with good opportunity for industry feed-in. Social media activity gave another layer of useful visibility.</p> <p>c) Yes, we believe SSEN to have operated a robust engagement strategy.</p>
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The DNO's work plan

<p>4. <i>Objectives:</i> Have you seen the DNOs work plans and the objectives they outline?</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>Yes.</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>c)</p>	<p>Yes.</p> <p>a) It is clear that along with a particularly robust events programme, SSEN has delivered on its commitments (mostly to time) and that commitments have met key KPIs.</p>

<p>6. <i>Outputs:</i> Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Did the DNO meet these outputs? Please explain why.</p>	<p>Yes. We believe that appropriate outputs were identified (and received considerable stakeholder engagement as they were drawn up). In our view these outputs have been met.</p>			
<p>Your feedback on the DNOs stakeholder engagement performance</p>				
<p>7. Do you think the DNO's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders?</p>	<p>Yes – particularly around accessibility of materials (i.e. producing summaries of what can otherwise be large volumes of documentation). Outages proved a key concern for some Scottish Renewables members lately, and SSEN were very quick to respond and engage.</p>			
<p>8. How satisfied are you with the DNO's overall engagement performance?</p>	<p>very unsatisfied</p>	<p>not satisfied</p>	<p>satisfied</p>	<p>very satisfied</p>
				<p>X</p>
<p>9. General feedback – please provide any further feedback on the DNO's 2018/19 engagement performance not covered in your responses above.</p>	<p>Scottish Renewables continues to question whether ICE is the most appropriate mechanism for driving good performance from DNOs around connections. It is evident that a considerable amount of resource is put into a very robust engagement programme, and while this is welcome, it needs to be noted that industry (particularly small businesses) have limited capacity to engage.</p>			

Section 2: Looking Forward plans 2019/20

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

<p>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>	<p>Yes</p>
<p>11. Do you agree that the DNO has a comprehensive work plan of activities (with associated delivery dates) that will meet the</p>	<p>Yes, the work plans are robust, and easily digestible. Scottish Renewables believes that work plans across the DNOs must look to enable our transition to 'net-zero carbon emissions' within the timescales committed to by Government. We are therefore</p>

<p>requirements of its connection stakeholders? If not, has the DNO provided reasonable and well-justified reasons? What other activities should the DNO do?</p>	<p>pleased to see several commitments from SSEN look to aid the connection of renewable generators, which of course will underpin this transition.</p> <p>We are particularly pleased to see commitments around flexibility services emerge – this is something that we and our membership has been keen to see progressed. Industry has continually fed-back to the DNOs and other stakeholders that heat maps are a useful tool, so the commitment to introduce a more granular level of detail of constraint on heat maps is welcome.</p> <p>In our view, SSEN have been particularly proactive in considering the impact of Electric Vehicles on their network, and we welcome their commitment to develop, share and update their electric vehicle strategy with stakeholders.</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>Yes – we believe these to be robust.</p>
<p>13. 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 not, has the DNO provided robust evidence that it has pursued this engagement?</p>	<p>Yes – in our view it is evidence that strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders.</p>

Response – Incentive on Connections Engagement – SPEN

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Section 1: Looking Back report 2018/19

We want your views on how well the DNOs have engaged with connections stakeholders over the last regulatory year

14. How many of the DNO's stakeholder engagement events have you been invited to this year? (This can include engagement outside official events.) Please tick a box.	none	1	2	3	4	5	6	>6
								X
15. How many DNO Stakeholder events have you been to? This can also include meetings outside of official engagement events. Please tick a box.	none	1	2	3	4	5	6	>6
					X			
16. Tell us about how the DNO engaged with you: d) What did the DNO do? e) How did the DNO do it? f) Did the DNO have a robust engagement strategy?	<p>g) SPEN has clearly worked to form a strong relationship with Scottish Renewables, allowing us and our industry membership to engage readily. SPEN has a strong events programme, which is key to enabling us and our members to engage, learn and discuss key issues. SPEN was also a visible participant in a number of key industry events, such as All Energy and the Scottish Renewables Hydropower Conference.</p> <p>h) Direct B2B relationships have been part of this, with staff building a strong working relationship. Additionally, we – and our members – were in receipt of emails and newsletters. Publications and consultation responses were well advertised, with good opportunity for industry feed-in. Social media activity gave another layer of useful visibility.</p> <p>c) Yes, we believe SPEN to have operated a robust engagement strategy.</p>							

The DNO's work plan

17. <i>Objectives:</i> Have you seen the DNOs work plans and the objectives they outline? c) Does it take into	Yes.
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<p>consideration your needs? If so, how? d) If it doesn't please explain why.</p>				
<p>18. <i>Actions:</i> Do you think the DNO has delivered its work plan? d) How has the DNO done this? e) If you do not think the DNO has delivered its work plan, please explain why.</p>	<p>Yes. a) It is clear that along with a robust events programme SPEN has delivered on its commitments, taking into account stakeholder feedback in doing so.</p>			
<p>19. <i>Outputs:</i> Were the outputs (KPIs, targets etc) in the DNO's work plan appropriate? Did the DNO meet these outputs? Please explain why.</p>	<p>Yes. We believe that appropriate outputs were identified (and received considerable stakeholder engagement as they were drawn up). In our view these outputs have been met.</p>			
Your feedback on the DNOs stakeholder engagement performance				
<p>20. Do you think the DNO's strategy, activities and outputs have taken into account ongoing feedback from a broad and inclusive range of connections stakeholders?</p>	<p>Yes – particularly around improving the navigation of the website.</p>			
<p>21. How satisfied are you with the DNO's overall engagement performance?</p>	very unsatisfied	not satisfied	satisfied	very satisfied
				X
<p>22. General feedback – please provide any further feedback on the DNO's 2018/19 engagement performance not covered in your responses above.</p>	<p>Scottish Renewables continues to question whether ICE is the most appropriate mechanism for driving good performance from DNOs around connections. It is evident that a considerable amount of resource is put into a very robust engagement programme, and while this is welcome, it needs to be noted that industry (particularly small businesses) have limited capacity to engage.</p>			

Section 2: Looking Forward plans 2019/20

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

<p>23. 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>Yes</p>
<p>24. 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 DNO do?</p>	<p>Yes, the work plans are robust, and easily digestible. Scottish Renewables believes that work plans across the DNOs must look to enable our transition to 'net-zero carbon emissions' within the timescales committed to by Government. We are therefore pleased to see several commitments from SPEN around areas such as DSO – 'project fusion'; and LV engine.</p>
<p>25. 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>Yes – we believe these to be robust.</p>
<p>26. 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 not, has the DNO provided robust evidence that it has pursued this engagement?</p>	<p>Yes – in our view it is evidence that strategy, activities and outputs have been informed and endorsed by a broad and inclusive range of connection stakeholders.</p>