

NOTES OF THE FIFTH MEETING OF THE WESTERN POWER DISTRIBUTION
CONNECTIONS CUSTOMER STEERING GROUP HELD ON TUESDAY 24TH FEBRUARY 2015
AT WPD GLOUCESTER OFFICE

Present:

Mark Boyce – UCSM Ltd
Russell Bourne – Utility Resource Services Ltd
Tamar Bourne – Regen SW
Zach Bullock – AMEY
Helen Ewing – Severn Trent Water
Steve Gist – TUSC Ltd
Mike Lawrence –UPL
Arwel Lloyd – Utilities Connections Management Ltd
David Overman – GTC
Mike Tanner – Power Systems UK
Bob Weaver – PowerCon (UK) Ltd & Renewable Energy Association
Robert Symons (RS) – WPD Chief Executive
Phil Swift (PS) – WPD Operations Director
Richard Allcock (RA) – WPD Connection Policy
Graham Halladay (GH) – WPD Network Services Manager South West
Alison Sleightholm (AS) – WPD Regulatory & Government Affairs Manager
Nigel Turvey (NT) – WPD Design & Development Manager
Natasha Richardson – WPD (in attendance)

Apologies

Steve Roberts - J Sainsbury plc
Alex Spreadbury – B&Q
Aidan Morris – Lightsource

1. INTRODUCTION

AS introduced the agenda for the day.

2. CHIEF EXECUTIVE'S UPDATE

RS gave an update on WPD operational performance in relation to safety, customer service and innovation, and progress on the implementation of the ten RIIO-ED1 Connections Outputs prior to ED1. He also provided an update on recent and planned connections stakeholder engagement activity.

Members were interested in the operation of the Time to Connect incentive, particularly in respect of customers who are not ready to connect immediately. RS advised that current timescales had been increasing as WPD allowed customers an extension of the normal 90 day validity period for connection offers. He advised that the TTC incentive does mean that WPD has reviewed its policy on validity periods for offers and would be more likely to cancel offers and refund payments to customers who wished to delay connections.

In respect of the WPD target of 20% faster connections RS said that the Steering Group may wish to review the criteria for measuring the WPD target to accommodate larger customers wishing to delay their connection. **Action: RS said that WPD will develop TTC targets for all market segments based on a benchmark using the new ED1 TTC guidelines.**

3. COMPETITION IN CONNECTIONS UPDATE

PS gave an update on Ofgem's review of competition in connections and the proposed new licence conditions and an enforceable Code of Practice (COP) setting out common minimum rules for all DNOs. He outlined the proposed areas to be included in the COP, and highlighted how WPD had been addressing these issues. PS explained the timetable for preparing the COP in consultation with stakeholders and noted that the timescales for consultation and harmonisation were challenging. He confirmed that the development of the COP was not intended to constrain WPD's improvement initiatives. A particular challenge was how to provide access to WPD information, particularly in facilitating the self determination of POCs.

A connections consultant asked about design approval & POC self determination where there was a need for upstream reinforcement. Is there an intention for design approval and POC COP rules to apply to immediate connections only? NT said that Ofgem had advised that they intended the COP to cover "straightforward" connections. NT said that connections could be either technically complex or commercial complex due to interactivity. NT recognised that some parts of the COP would need to be initially limited. The COP could then develop under the governance process.

An ICP/IDNO reported back from MCCG. He advised that Neil Fitzsimmons has written to Brian Hoy (who is chairing the DNO working group developing the COP) outlining the consensus of MCCG members and requesting active involvement in the consultation process.

PS highlighted the requirement for dual quotes across all market segments including the small customer market segments LVSSA and LVSSB. WPD has raised concerns with Ofgem that dual quotes may confuse smaller customers.

PS advised that WPD would be offering an emergency response service to IDNOs across all 4 DNO areas. The service has been running in WPD South West and WPD South Wales for 7 years.

There will be three regional briefings in London, Manchester and Glasgow to seek the views of interested parties on the content of the COP. He encouraged members to attend and give their views.

A connections consultant asked about governance of the COP via DCUSA. NT said WPD supporting using existing governance arrangements such as the D Code or DCUSA due to the time constraints. He recognised that neither of these provided open access to all parties. NT said that the D Code governance arrangements were slightly more open. A connections consultant asked in WPD would support the DCUSA DCP modification proposal currently sitting with the COG that would allow voting rights under DCUSA to customers/agents and ICPs. **Action: NT to consider WPD's response to the proposal.**

4. ICE INCENTIVE DRY-RUN OFGEM FEEDBACK AND NEXT STEPS

AS gave an update on feedback from Ofgem on WPD's dry-run ICE submission. All DNOs met the minimum requirements. Ofgem feedback was reasonably positive, indicating that all DNOs were showing adequate engagement with stakeholders. Ofgem had felt that too much weight was given to WPD's Connections Steering Group. However AS said that this was the expert group, therefore its views were important.

AS said that one area of improvement was identified as the need to measure the delivery of initiatives and outputs. WPD would be asking the Steering Group for assistance with measuring delivery.

AS advised that Ofgem have issued updated guidance. A single submission is now required by the end of May, rather than two separate looking forward and looking back reports. There will be an opportunity to update the submission at the end of October. An ICP/IDNO asked whether WPD would do a single WPD submission or 4 DNO submissions. AS said that Ofgem had listened to feedback and now only required a single submission. Members welcomed this, and asked if there could be a standardised response form format for ease of stakeholders to comment on all DNO submissions. It was also suggested that there could be a form of signoff from the CCSG to WPD's workplan and strategy for the ICE submission.

Action: AS to consider ways to make it easier for Steering Group members to give feedback on ICE submissions.

5. ONLINE APPLICATIONS UPDATE

GH gave an update on the action from the Steering Group to improve WPD's online application processes. GH said that WPD offered two separate online facilities.

Firstly the CIRT facility is available to ICPs/IDNOs with a fixed IP address to provide information and track the progress of their connection application. CIRT allows for the management of multiple connections. GH advised that from April CIRT will also be opened up to large/high volume customers with a fixed IP address. CIRT does not offer an online payment facility. GH confirmed that CIRT is an optional service, ICPs are able to interact with WPD offline as well.

Secondly customers can make a quotation application online and are emailed confirmation at key stages in the process. This facility does not require a fixed IP address. From April customers will be able to use the online service to request a budget estimate and then a full offer, accept quotations online and make payments online (credit/debit & bank transfer). GH confirmed that WPD would continue to accept payment by cheque and payment of invoices.

An ICP/IDNO asked if a customer could provide a purchase order and WPD send an invoice. GH confirmed that for larger schemes payment on acceptance was not always required and that it depended on the terms in the offer letter.

GH said that a further enhancement from April would be for customers to pay invoices using a unique ID and password for each connection. He confirmed that this would enable another party e.g

a land agent to make payment. A connections consultant said this would be confusing for customers with a high volume of connections. Member also raised concerns about DG connections and high volume connections.

An ICP/IDNO asked if WPD could monthly bill large customers, especially high volumes customers, rather than invoice for individual schemes. GH said that this would require a change to WPD connection processes.

A utility representative asked if refunds could be made online. GH said that this would not be done online.

GH advised that if there were land issues, full written acceptance would also be required. However enhanced functionality would allow attachments to be submitted with acceptance (such as legal documents). If there were no land issues, customer could simply accept electronically.

A connections consultant asked whether acceptance was written acceptance or payment. He wanted acceptance to be written acceptance and not payment. GH explained that for small customers (LVSSA & LVSSB) payment is required on acceptance. **Action: GH to advise on acceptance for larger customers.**

A utility representative asked if there was the facility for a third party to process a connection online for a customer. GH said that details could not be changed online. However a phone call could be made to the local team to update the record.

Where a dual quote is provided to a customer and subsequently the non-contestable works only is accepted, can the details be changed to the ICP. GH said this would need to be updated offline. However CIRT already allows the transfer of enquiries between companies.

GH asked members to consider whether the whole end-to-end process should be available online.

A connections consultant asked if customers would be able to log-in and see all of their connection jobs. GH said that CIRT provided this facility. However the customer online system did not provide this functionality. A connections consultant said that some utilities enabled 3 addresses to be entered (site address, correspondence address, consultant etc). **Action: GH said that he would look into allowing multiple addresses to be entered online.**

6. ICE & CCSG WORK PLAN UPDATE 2014/15

AS advised on key actions delivered in 2014 in response to feedback from the Steering Group. She highlighted a range of successful initiatives.

Users can now register on the WPD website for fortnightly updates on any changes to the website. This has proved popular with users.

WPD has run 5 Community Energy events and published a guide to connecting community energy schemes, both in conjunction with Regen South West.

WPD has also improved access to asset data. It also launched an online capacity register so that users can view connected and accepted generation on the network. It is intended that the online capacity register will be updated monthly.

Dual offers have now been extended to all DG customers, and e-signatures are now accepted for connection agreements.

WPD has consulted on and improved the way it deals with connections interactivity.

WPD has implemented a suite of “alternative offers”. TB asked what the take-up has been.

Action: AS to report back.

Work on legals and consents is ongoing. External guidance has been published, and staff trained to improve consistency of approach across the company. A connections consultant asked who the WPD point of contact is for dealing with inconsistent treatment. AS advised that Christian Hjelm is the responsible manager and has been rolling out training.

A new policy on link boxes has been implemented which puts WPD in a good position to comply with the new COP.

A consolidated inspections and monitoring regime is being rolled out across WPD, but will need to be reviewed in the light of COP requirements.

AS confirmed that a DG specific survey has been undertaken over the last 3 years. For 2015 the survey will be repeated, this time disaggregated across LV, HV and EHV connections. **Action: AS asked members to provide feedback on other ideas on measuring DG customer satisfaction.**

AS advised that legal advice was been sought on whether e-signatures were acceptable for adoption agreements and IDNO BCAs. **Action: RA to obtain legal advice as to whether this can be extended to novation agreements.**

An engagement plan for Community Energy was being developed to help them understand the process. **Action: AS to advise on WPD interpretation on split sites within the FIT rules.**

AS reported on the extension of contestability. Again this will be progressed under the COP.

Action: AS asked members to provide feedback on their experience of any areas of inconsistency across WPD.

A connections consultant highlighted the new WPD policy of staff calling customers at each stage of the connections process. He said that this was welcome of individual small customers. However for larger volume customers, this may not work so well. AS recognised that the policy may need to be reviewed in the light of customer feedback.

A connections consultant asked about opening up competition for disconnections. AS said that WPD would consider disconnections on brown field sites and had looked at this issue but had limited experience. Jason Raymond/Neil McGrath had issued a paper on the matter via the Ofgem ECSG (Electricity Connections Steering Group). An ICP/IDNO updated members on some improvements that had been made to the ICP/DNO interface and advised that he would be happy to share his

experience.

Action: RA to circulate the ECSG paper.

A connections consultant highlighted the issue of making small customers aware of CIC, even for small single services or service alterations. He said that ICPs aren't interested in small one-off jobs, so it wastes small customer's time seeking a competitive connection. An ICP/IDNO recommended that DNOs franchise out service alterations as they are resource intensive. A connections consultant said that a multi-utility approach may address this issue, and that on a recent occasion he had managed to get two utilities to use the same trench across a road, by co-ordinating the work.

7. ICE & CCSG WORK PLAN FOR 2015/16

NT introduced the 015/16 workplan. He said the Key themes are consistency, communication and engagement, the post acceptance service, better network information, and further extension of contestability.

NT asked members for feedback on:

Views on WPD's updated plan.

Is the format suitable?

Is there anything missing?

How can the WPD website be improved?

8. FEEDBACK SESSION

An ICP/IDNO asked if the DG survey could be expanded. AS explained that the BMCS would cover the majority of smaller customer connections.

A connections consultant asked for a breakdown of figures for ANM alternative connections. See above action under paragraph 6.

Members supported WPD having a specific connections steering group as best practice for enabling customer engagement. AS explained that there was also a wider WPD Customer Panel, that she welcomed feedback on improving the Connections Steering Group.

A connections consultant asked in online mapping data would include schematics. NT said not yet but this was under consideration, as was an interim solution. An ICP/IDNO said that the availability of UPKN mapping and standard design data was very good.

A connections consultant commended WPD on the new online service to check MPAN details and also the webchat facility, where you can request an email transcript of the interaction.

Members commented that communication during the wayleaves process is a "blackhole" for all DNOs. This is further complicated by the involvement of external legal advisers. It was noted that although wayleaves is contestable works, not many ICPs have wayleaves or rights understanding. An ICP/IDNO said that there was a difficulty in obtaining information about rights over third party land.

Also POCs are often provided on the assumption that wayleaves are available. **Action: NT said he would consider mains records online and a reference to access wayleaves.**

A connections consultant also noted the issue of “dual-adopted” substations, which can cause delays. NT said that WPD allowed ICPs to deal with legal agreements as long as they incorporate WPD terms. Also that the legal process does not start until after acceptance. An ICP/IDNO said that an ICP can commence legals whenever they wish.

RB suggested that the offer letter requests preparatory legals requirements, so that this can be passed to the customers’ legal advisers. **Action: WPD to review offer letters.**

An ICP/IDNO said that DNOs have different legals process requirements such as leases. **Action: Under action 1.1 NT to collaborate with DNOs to produce a list of DNO policies to highlight differences. This could enable a move towards harmonisation of policies.**

Action: AS offered to consider whether WPD could introduce standards or monitors on the legals process.

A connections consultant asked where is the DNO boundary on BNO networks? An ICP/IDNO noted that this was part of the G87 review. **Action: AS to consider WPD position on BNOs.**

A connections consultant asked for an improved terms letter with key information on the front page to improve the format. The key points may vary for different jobs. NT said that this was in development as part of dual offers.

An ICP/IDNO asked for more information related to the connection offer to be posted on CROWN for ICPs to be able to access via CIRT. Possibly with a tick box to opt in/out of being contacted for follow-up.

Members highlighted the need to develop the process to follow-up with customers to schedule works and discuss the customer’s progress.

An ICP/IDNO commended WPD for providing a consistently helpful service across all regions. AS said that WPD was endeavouring to continue to improve the level of consistency across local offices.

An ICP/IDNO highlighted the 80/20 rule, to focus on supporting the 20% of more complex connections, and reducing the need to support independent providers from the 80% majority of connections (non DG over 315kW, LV over 200KVA) through the extension of activities that the independents can undertake themselves.

An ICP/IDNO also highlighted the problem of IDNOs networks located between areas of DNO networks, which may prevent access between primary substations.

An ICP/IDNO said that for “other unmetered” is not necessary to provide a POC – e.g BT cabinets. He said this was not necessarily a WPD issue.

An ICP/IDNO asked whether ICP self-assessment of a connection will secure the capacity faster. Will these mean that customers should only chose an ICP who can do self-assessment. He said that alternatively the customer should go straight to the DNO. Hence he said that this area of queuing

for HV/EHV capacity needs to be explored. **Action: WPD to consider this issue as part of the development of the CoP.**

An ICP/IDNO said that with regard to the trial of contestability of partial funding of reinforcement, WPD should be more proactive in offering opportunities to ICPs. RA said that WPD would be promoting this to ICPs and on its website.

NT said that in the longer term WPD was looking to introduce ICP self-inspection that would not be chargeable. Similarly WPD wanted to develop a new design approval regime to enable ICP self-approval.

AS said that WPD would be developing a Community Energy Strategy.

An ICP/IDNO asked about the impact of electric vehicles. NT said he did not know how this would develop, but it could cause problems if it did.

A connections consultant asked about DG declared capacities vs actual exported capacities. There is no DG maximum export capacity charge (other than EHV connections). Is there more capacity available in reality than declared capacity. Can the workplan identify that capacity or studies to achieve this? NT said that understanding diversity was more of an innovation project issue for research into developing a policy for assuming DG diversity. RA said that this would be addressed in part by changing the DG offer letter and connection agreement, to restrict the maximum export capacity in the Connection Agreement of DG to the installed capacity.

An ICP/IDNO asked if WPD anticipated large scale rooftop solar and LV street connections. He said that some major developers were interested. This would also depend on government policy to encourage solar development. NT said that factories were connecting rooftop solar.

Key Performance Indicators

NT highlighted proposed KPIs. Also he noted an extra KPI requested of number of alternative offers connections.

An ICP/IDNO proposed measures of the extension of contestability, such as number of POCs, LV contestable connections etc.

Members said that the 20% TTC WPD target should be on timeliness rather than on reduced timescales. The measure should be % on agreed date, or customer satisfaction levels.

Action: WPD to provide a proposal based on members initial feedback.

9. SUMMARY & NEXT STEPS

RA highlighted that the WPD Plan will continue to develop and he would welcome feedback from members.

Dates of next meetings

Tuesday 23 June - Gloucester

Tuesday 20 October - Gloucester

Summary of Actions:

	Actions	Owner
1.	WPD to develop TTC targets/KPIs for all market segments based on a benchmark using the new ED1 TTC guidelines. Also based on CCSG feedback that the measure should be on agreed date or customer satisfaction levels.	Graham Halladay
2.	WPD to develop a KPI for alternative connection offers. WPD to develop KPIs related to CIC activity.	Nigel Turvey
3.	WPD to consider WPD's response to the DCUSA proposal on third party voting rights.	Nigel Turvey
4.	WPD to consider ways to make it easier for Steering Group members to give feedback on ICE submissions.	Alison Sleightholm
5.	WPD to look into allowing multiple addresses to be entered in the online application system.	Graham Halladay
6.	WPD to obtain legal advice on whether e-signatures can be accepted for novation agreements.	Richard Allcock
7.	WPD to provide WPD interpretation on community energy split sites within the FIT rules.	Alison Sleightholm
8.	WPD to consider further improvements to the legals process - mains records online and a reference to access wayleaves and for offer letters to indicate preparatory legals requirements, so that this can be passed to the customers' legal advisers.	Nigel Turvey
9.	Under action 1.1 NT to collaborate with DNOs to produce a list of DNO policies to highlight differences. This could enable a move towards harmonisation of policies.	Nigel Turvey
10.	WPD to consider introducing standards or monitors on the legals process.	Alison Sleightholm
11.	WPD to consider the position on BNO boundary position.	Alison Sleightholm
12	WPD to consider the issue of whether ICP self-assessment of a connection will secure the capacity faster and report back to CCSG.	Nigel Turvey