



Fair and Effective Management of DNO Connection Queues: Treatment of Changes to Connection Requests

Stakeholder Consultation Document

10 January 2018

Energy Networks Association

Table of Contents

Introduction.....	1
Why are we consulting?	1
Section 1	4
Background to this consultation	4
Network Connections for Storage	4
Storage and Allowable Change	5
Section 2	6
Purpose and Objective of this consultation	6
Process for connecting to the network.....	6
Connections Queue.....	7
Potential impact of requesting change(s) to a connection request	7
Consistency and treatment of Allowable Change	7
Section 3	9
Impact of an Allowable Change on the customer’s queue position	9
Overriding Principles of Allowable Change	9
Revised Overriding Principles of Allowable Change	9
‘Disallowable’ Change and Queue Position.....	10
Telecoms	10
Change Request Scenarios.....	11
Revised change request scenarios	11
Section 4	12
Change Request Scenario One	12
Change Request Scenario Two	14
Change Request Scenario Three	16
Change Request Scenario Four	19
Responses	21
Next Steps	21
Appendix 1.....	22
Appendix 2	23

Fair and Effective Management of DNO Connection Queues: Treatment of Changes to Connection requests

Introduction

1. This consultation is issued by the Energy Network Association's (ENA's) Distributed Energy Resources (DER) Connections Steering Group¹ and seeks stakeholders' views on the proposals it sets out in respect of what changes a customer can make to a project after a connection request for it has been made, while maintaining the project's place in the connections queue.
2. We are consulting as part of the wider work being undertaken for Quicker and More Efficient Connections (QMEC) by Ofgem and specifically in response to a request for DNOs to *'Consider...whether DG customers who make slight changes to connections requests (e.g. transformer location) should be treated as a new request and moved to the back of the queue.'*²
3. Whilst the DER Connections Steering Group has produced this consultation, the change request scenarios set out within it have been developed to apply to all connection customers not just distributed generation (DG). The ENA DER Connections Steering Group is made up of a number of diverse stakeholders, including various distributed energy resource providers and trade association representatives, six Distribution Network Operators (DNO) and an Independent Distribution Network Operator (IDNO) representative. Throughout this consultation document DNOs & IDNOs are collectively referred to as 'Network Operators' (NWOs).

Why are we consulting?

4. Projects (generation, demand or both) that wish to connect to the electricity distribution network are required to make an 'application to connect' to the relevant Network Operator (NWO). The application to connect is typically undertaken at an early stage in a project's development timeline. On receipt of an application to connect, where applicable³, the project will be placed in a connections queue, with the expected date of connection often dependant on certain reinforcement being made to the network (and the extent to which other projects already in the connections queue progress along their development pathway).

¹ For more information on DER Connections Steering group see www.energynetworks.org/electricity/regulation/working-groups.html

² Quicker and more efficient connections – an update on industry progress, Ofgem (page 10) www.ofgem.gov.uk/system/files/docs/2016/01/quicker_and_more_efficient_connections_jan_2016_-_final_29.01.2016_0.pdf

³ Where one or more projects have already made applications to connect to the same part of the network.

5. Where a project developer/owner wishes to change the design and/or characteristics of a project after a connection request has been made, this can potentially impact on the position of the project in the connections queue, which in turn may extend the time for it to connect and/or increase the cost for it to connect. NWOs have an obligation to make sure network capacity is granted to customers who can make use of it, and to avoid unnecessary reinforcement where practical. Stakeholders have therefore shown support for a set of principles which can be used to guide the fair allocation of network capacity to parties who can make use of it, such that connecting customers should be held reasonably to account for progressing the proposed project which requires a connection (see ‘Background to this Consultation’ below). The application of the aforesaid principles across a range of scenarios results in a set of ‘Allowable Changes’ which a customer can make to a connection request, beyond which queue position may be lost in favour of other customers. These ‘Allowable Changes’ are intended to work alongside any progression milestones which the NWO is using to reasonably gauge project progression, as detailed in the ENA best-practice guidance note ‘Fair and Effective Management of DNO Connection Queues: Progression Milestones Best Practice Guide’⁴.
6. Providing greater certainty on how a proposed change to a project will affect a project’s position in the connections queue is therefore important for project investors, owners and operators as well as network companies.
7. NWOs therefore want to ensure that what constitutes an ‘Allowable Change’ is fair and reasonable, both to the customer needing to make a change to a connection request, and also to other customers who are impacted when those ahead of them in the connections queue make a significant change to their project.
8. Building on an earlier consultation undertaken by the DER Connections Steering Group⁵, this consultation seeks to provide greater clarity on this issue and the balance between allowing customers appropriate flexibility while progressing a connection request, but remaining fair to other customers in the connections queue.
9. The consultation is structured as follows:

Section 1. Provides further background to the consultation and the inclusion of storage technologies;

Section 2. Provides more detail on the purpose and objectives of the consultation;

⁴ ‘Fair and Effective Management of DNO Connection Queues: Progression Milestones Best Practice Guide’ <http://www.energynetworks.org/assets/files/news/publications/Reports/ENA%20Milestones%20best%20Practice%20Guide.pdf>

⁵ ‘Fair and Effective Management of DNO Connection Queues: Treatment of Changes to Connection requests’ April 2016 www.energynetworks.org/assets/files/news/consultation-responses/Consultation%20responses%202016/Fair%20and%20Effective%20Management%20of%20DNO%20connection%20Queues%20Treating%20Changes%20within%20Applications.pdf

Section 3. Sets out:

- (i) ‘Overriding Principles’ and ‘Change Request Scenarios’ developed by the DER Connections Steering Group for use when considering what constitutes a ‘Allowable Change’;
- (ii) Our ‘minded to’ position for determining what types of change(s) to a connection request should be classed as a ‘Allowable Change’ and impact on a project’s position in the connections queue; and
- (iii) How feedback to the previous consultation has been taken into account in the development of (i) & (ii);

Section 4. Describes the change request scenarios in greater detail together with the rationale for the proposed treatment of different change types in terms of their impact on a project’s position in the connections queue.

Appendix 1. Sets out the ‘Overriding Principles’ proposed under the previous consultation.

Appendix 2. Sets out the change request scenarios used under the previous consultation and subsequent changes.

Section 1

Background to this consultation

- 1.1 In response to Ofgem's work on quicker and more efficient connections, the Energy Network Association's (ENA's) DER Connections Steering Group issued a consultation document in April 2016 entitled '*Fair and Effective Management of DNO Connection Queues: Treatment of Changes to Connection requests*'.⁶ The consultation considered what changes a customer can make to a connection request, while maintaining a place in the connection queue.
- 1.2 We received a number of responses to the consultation and the proposals and questions it set out. This provided valuable feedback from stakeholders and a sound basis for working towards finalising many of the approaches set out, however it also highlighted a number of areas where it was felt these should be reconsidered and/or greater explanation and clarity provided. It is on this basis that the DER Connections Steering Group concluded further consultation is needed.
- 1.3 This second consultation document sets out our updated 'minded to' position on a number of our proposals, reflecting feedback from both the April 2016 consultation and DER Connections Forum stakeholder event held in Birmingham in September 2017, and responds to those areas highlighted by stakeholders as requiring further consideration. In doing so, the DER Connections Steering Group has sought to develop a workable approach that caters for the majority of scenarios i.e. scenarios that experience has shown to be most common or that can be plausibly envisaged. It is recognised that there may be scenarios that may not lend themselves to the approaches set out in this document and so can be considered as unusual and best addressed on a case by case basis.

Network Connections for Storage

- 1.4 DNOs have seen an increasing number of applications for the connection of electricity storage facilities (generally battery technology) over the last two years. Indeed, National Grid's *Enhanced Frequency Response* tender in 2016 resulted in excess of 20GW of applications to connect storage to GB DNO networks. It is commonly recognised that the unique operational and commercial flexibility that an electricity storage facility can provide poses a number of technical, planning and commercial challenges in its integration to the distribution networks. Ofgem and BEIS in their call for evidence document "*A Smart. Flexible Energy System*" published in November 2016 identified a number of storage related issues for the

⁶ 'Fair and Effective Management of DNO Connection Queues: Treatment of Changes to Connection requests' April 2016 www.energynetworks.org/assets/files/news/consultation-responses/Consultation%20responses%202016/Fair%20and%20Effective%20Management%20of%20DNO%20Connection%20Queues%20Treating%20Changes%20within%20Applications.pdf

industry to consider⁷. One of these issues is how storage should be treated within the context of existing connection requests. Specifically, further clarity is sought on whether the addition of storage to an existing connection request constitutes an Allowable Change.

Storage and Allowable Change

- 1.5 Here we provide information on storage technologies and their use which has informed the treatment of storage in the context of Allowable Change and the scenarios set out in this document.
- 1.6 On 29 September 2017, Ofgem published a consultation “*Clarifying the regulatory framework for electricity storage: licensing*⁸” which set out the regulator’s proposals to modify the electricity generation licence for storage. The document makes clear that Ofgem and the Government have agreed that it is important to ensure consistency between both storage and electricity generation and consider that the existing electricity generation licence is best placed to clarify the regulatory framework for storage. This is because generation and storage share similar characteristics and perform similar functions in terms of generating and exporting electricity to the grid. For the purpose of this document and the approaches it sets out, consistent with the regulators’ proposed approach we have classified storage as a form of generation.
- 1.7 Storage can open up many possibilities. It can help to integrate variable renewable generation, reduce the costs of operating the system and help avoid or defer reinforcements to the network. Therefore, whilst we have classified storage as a form of generation when considering what constitutes an Allowable Change, we recognise that there may be circumstances where proposed changes to a connection application involving storage may not be treated in the same way as conventional generation. This may result in the different treatment of storage, for example, where the provision of a specific service creates local connection capacity, thereby justifying a change as Allowable Change. Similarly, where the connection of storage enables capacity that sits in front of it in the connections queue to reduce its time and/or cost to connection then in these circumstances there may be a case for the prioritisation of the connection of storage. The ENA Open Networks Project⁹ is taking forward work that considers these questions the results of which will inform further updates to the Allowable Change framework set out in this document.

⁷ ‘Call for Evidence: A smart flexible energy system’ Chapter 2, Table 3 Network Connections for Storage www.gov.uk/government/consultations/call-for-evidence-a-smart-flexible-energy-system

⁸ “Clarifying the regulatory framework for electricity storage: licensing” https://www.ofgem.gov.uk/system/files/docs/2017/10/electricity_storage_licence_consultation_final.pdf

⁹ ENA Open Networks Project <http://www.energynetworks.org/electricity/futures/open-networks-project/open-networks-project-overview/>

Section 2

Purpose and Objective of this consultation

- 2.1 The purpose of this consultation is to bring clarity to the concept of ‘Allowable Change’ in the context of maintaining queue position, by presenting a set of principles accompanied with a non-exhaustive set of scenarios to illustrate. This builds on the previous consultation (referred to under section 1 of this document), by seeking the further views of stakeholders on the proposals set out in respect of what changes a customer can make to a connection request, while maintaining a place in the connections queue (an ‘Allowable Change’).
- 2.2 We have introduced this new term, ‘Allowable Change’, to distinguish from the similar concept of ‘Material Change’ as described in the previous consultation. A ‘Material Change’ is when a customer who has made a connection request is asked to submit a new connection request to the NWO. The requirement to submit a new application often means that the customer will lose its place in the connections queue, but not in all situations. The majority of responses to the previous consultation supported a greater focus on the impact on a customer’s queue position, which led to the need to differentiate from Material Change.
- 2.3 Losing a place in the connections queue can have a significant impact on a customer – potentially extending the time and/or increasing the cost to connect to the network. Consequently, NWOs want to ensure that what constitutes ‘Allowable Change’ is fair and reasonable, both to the customer wanting to make changes to an application but also other customers who are impacted when those ahead of them in the connections queue make a significant change to their project.

Process for connecting to the network

- 2.4 A customer wishing to connect to the network is required to submit a ‘connection request’ to the relevant NWO. In making an application the customer will set out certain necessary details of their planned project.
- 2.5 Following receipt of a customer’s connection request the NWO will issue the customer with a ‘connection offer’ which is effectively the NWO’s offer to build the connection. If the customer accepts the connection offer a ‘connection agreement’ is made between the NWO and the customer which is a separate document that is an operational agreement that sets out the rights and obligations between the parties.
- 2.6 In this consultation we refer to three stages in the connection process:

Post application – pre offer	Post offer – pre acceptance	Post acceptance – pre energisation
------------------------------	-----------------------------	------------------------------------

Our analysis of the change request scenarios under Section 4 is applied across these three stages when considering the impact of a change on a project's queue position.

Connections Queue

- 2.7 Customers wishing to connect to the network are placed in a connections queue. The date on which a project enters the queue and therefore its place within the queue is generally determined by the date of the application for pre-acceptance¹⁰. In some areas of the electricity distribution network, there is limited capacity to connect new customers. This means that reinforcement may be required to the network to enable connections to be made, which can take some time to complete. Prior to when reinforcement is undertaken, NWOs oversee the queue, managing the timing over who can connect prior to any reinforcement works and who can connect once reinforcement has taken place. In managing the connections queue NWOs need to apply a fair and reasonable approach that takes into account the circumstances of all of the developments in the connections queue.

Potential impact of requesting change(s) to a connection request

- 2.8 Customers who request a change(s) to their connection requests can, dependent upon the nature of the requested change, affect other customers who are behind them in the queue. Where a customer makes an Allowable Change they will maintain their place in the connection queue. Other changes to a customer's connection request will cause a project to lose its position in the connections queue. At present, NWOs have slightly different criteria to what they define as an 'Allowable Change' and therefore the circumstances when a customer loses its place in the connection queue can vary¹¹.

Consistency and treatment of Allowable Change

- 2.9 The overall objective of this consultation is to develop a clear and consistent approach that can be applied across NWOs when considering change requests. To this end we believe that the principles and scenarios set out under sections 3 and 4 will provide a number of benefits which include:

- Assist NWO's in applying a fair and reasonable approach to change requests that takes into account the circumstances of all customers in the connections queue;

¹⁰ Note that each of the NWOs apply their own process for managing their connections queue including interactivity.

¹¹ See UK Power Networks Policy <http://www.ukpowernetworks.co.uk/internet/asset/bba824d1-96a0-455b-8b42-34584f4c077G/UK+Power+Networks+-+Management+of+Capacity+%28updated+Table+of+Events+February+2016%29.pdf> and Western Power Distribution Policy https://www.westernpower.co.uk/docs/connections/New-connections/Budget-estimates,-feasibility-studies-formal-off/Allowable-changes-to-applications-Final-01_04_2016.aspx

- Provide greater certainty to customers on the likely impact of a change to a project;
- Assist customers in understanding NWO decisions on change applications; and
- Assist consistency of treatment of change applications across all NWO licencees.

Section 3

- 3.1 This section sets out the Overriding Principles developed by the DER Connections Steering Group for use when considering what types of change to a project constitutes an Allowable Change. It also describes a number of change scenarios that could be made by a DG Customer. These have been developed by the Steering Group and are considered as ‘real world’ scenarios that experience has shown to be most common or that can be plausibly envisaged.
- 3.2 The Overriding Principles and change scenarios set out under this section reflect a number of changes made in response to feedback received to the previous consultation and represent our ‘minded to’ position on them. Particularly, a large number of respondents to the first consultation indicated that they would like to have greater certainty of the impact of a change on the queue position of an application.
- 3.3 In describing the change request scenarios set out under Section 4 we have therefore placed a greater emphasis on the impact of the change scenario on queue position.

Overriding Principles of Allowable Change

- 3.4 As part of the previous consultation DER Connections Steering Group originally proposed five Overriding Principles for use when considering what constitutes an Allowable Change. These are shown in Annex 1. Following feedback to the first consultation these have been rationalised to four and are shown below. This consultation seeks views on these four principles.

Revised Overriding Principles of Allowable Change

- 3.5 The remaining four Overriding Principles, with some drafting clarifications therefore now represent our ‘minded to’ position. These are shown below.

OP1. Any change request that has a ‘**Detrimental Impact**’ on any other applicant in the connections queue will generally impact on the applicant’s queue position and will NOT be regarded as an Allowable Change. ‘*Detrimental Impact*’ means a material extension of the time and/or the cost to connect.

OP2. Where a customer makes changes at the Point of Supply (PoS) which affects the Point of Connection (PoC) such that the PoC moves from one circuit to a different circuit this is NOT an Allowable Change and will impact on the applicant’s position in the connections queue. (This means a change in circuit connectivity and not for example, a request to move from outside 2 Acacia Avenue to outside 4 Acacia Avenue, or from pole 57 to pole 58).

OP3. Where there is a fundamental change to the operational profile of the connection, for example from ‘import’ only to ‘import and export’ this is NOT

an Allowable Change and will impact on the applicant's position in the connections queue.

OP4. The NWO will engage with the applicant to ensure project progression without the applicant losing their position in the connections queue where there is no detrimental impact on other applicants (this may require a new application to be made).

'Disallowable' Change and Queue Position

3.6 Where a change is not an Allowable Change or will impact detrimentally on others in the connections queue then a new connection application will need to be submitted to the NWO which will result in a project losing its existing position in the connections queue. In practice making a new application may be done as an amendment to the existing connection application. The NWO will then issue the customer a revised contract with the necessary variation.

Telecoms

3.7 Where there is a change to the method of telecoms provision for a project this can normally be expected to constitute an Allowable Change as it is unlikely to have a detrimental impact on other projects in the connections queue.

Questions:

1. Do you agree with the Overriding Principles?

2. Are there any other principles that should be included in addition to the four set out above?

3. Is the definition of 'detrimental impact' appropriate?

Please provide evidence to support your response.

Change Request Scenarios

- 3.8 Our previous consultation originally identified eight scenarios (see appendix 2) where a customer may request a change to their original connection request. Following feedback to that consultation these have been further refined and reduced to four. Here we present our minded to position for these four scenarios.
- 3.9 The underpinning rationale for determining the circumstances under which a change is 'disallowable' so causes a customer to lose their place in the connections queue is detailed under Section 4. NWOs will use feedback from this consultation to assess how they choose to implement these definitions.

Revised change request scenarios

- 3.10 The four revised change request scenarios are:

Scenario 1: Request to change generation technology type or mix of generation technology types from any one technology type (or mix of technology types) to a different technology type (or mix of technology types).

Scenario 2: Request to alter the meter arrangements (downstream of Point of Connection (PoC)) with no change to overall requested capacity.

Scenario 3: Request to alter capacity (MVA).

Scenario 4: Request to change location of the Point of Supply (PoS).

Questions:

4. Do you agree with the four revised change request scenarios that now represent our 'minded to' position?

5. Are there any other change request scenarios in addition to the above list that are likely to occur on a wider scale?

Please provide evidence to support your response.

Section 4

- 4.1 In this section we describe and illustrate in more detail each of the revised change request scenarios under Section 3. Under each change scenario we set out our ‘minded to’ position.

Change Request Scenario One

Scenario One: Request to change generation technology type or mix of generation technology types from any one technology type (or mix of technology types) to a different technology type (or mix of technology types).

- 4.2 Responses to the previous consultation suggested that the wording of this scenario ‘change to technology type’ could be improved/made clearer. The scenario variants therefore covers circumstances where a change to the connection request encompasses any of the following:
- A. A change from one generation technology type to storage, for example, from a wind turbine(s) to storage (i.e. storage replaces the technology used in existing connection request);
 - B. The addition of storage to an existing connection request, for example, from wind turbine(s) only to wind turbine(s) and storage (i.e. storage is added to the existing technology and the Maximum Import Capacity (MIC) and/or Maximum Export Capacity (MEC) increases);
 - C. A change to the prime mover(s) or similar fundamental change in a project, for example, wind turbine(s) to diesel reciprocating engine(s) or similar change to technology or technology mix contained in the existing connection request;
 - D. A minor change to essentially the same project, for example, change from wind turbine Type ‘X’ to wind turbine Type ‘Y’.

4.3 The scenario change types and impact on queue position are shown in the table below:

Impact on Queue Position:

Scenario 1	Change Type (Variant)	Impact on Queue Position		
		Post Application – Pre Offer	Post Offer – Pre Acceptance	Post Acceptance – Pre Energisation
Request to change generation technology type or mix of generation technology types from any one technology type (or mix of technology types) to a different technology type (or mix of technology types).	A	Disallowable	Disallowable	Disallowable
	B	Disallowable	Disallowable	Disallowable
	C	Disallowable	Disallowable	Disallowable
	D	Allowable	Allowable	Allowable

Rationale: A change in technology generation type as described above, for example, can be expected to have a significantly different impact on the network compared to the original project. For example, a NWO may be able to connect a wind farm at certain locations on the network without reinforcement. However, if the technology changes to diesel it can have a very different impact on the network and require reinforcement to be made. It therefore seems fair to other customers in the connections queue that these types of change request are treated as wholly new connection requests and the queue position is lost.

Change is solely to make or model of technology used

Where a change is solely a change to the make or model of the technology type(s) contained in the original application, for example, change from Supplier 1’s wind turbine to Supplier 2’s turbine, with all other aspects of the project remaining unchanged, this is typically classed as an Allowable Change and will not impact on a project’s queue position. [NB. This allows a site to contain wind turbines from different manufacturers. This approach also applies to the technology combination scenarios described above.]

Questions:

6. Do you agree with the ‘minded to’ approach for the impact on queue position of these various change types?

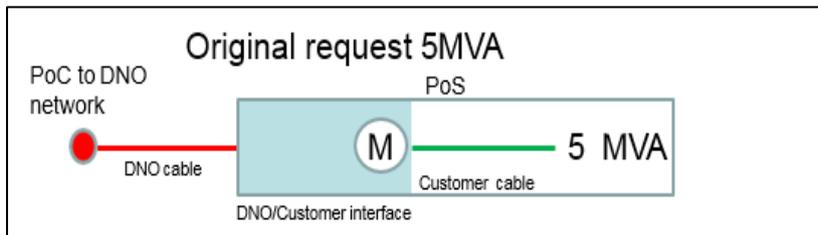
7. Are there any other change type(s) that would have a similar impact on the network but are not included above?

Please provide evidence to support your response.

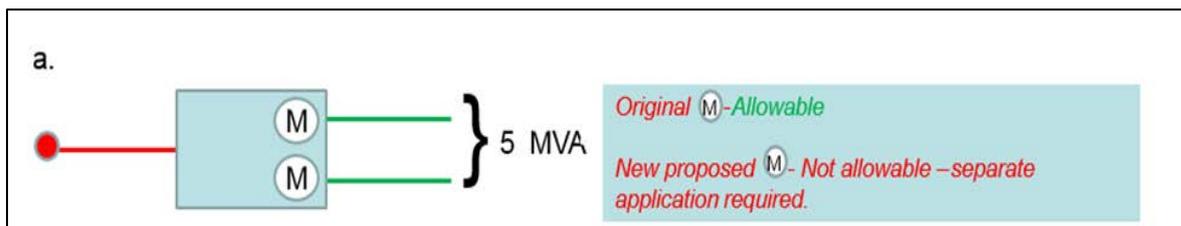
Change Request Scenario Two

Scenario Two: Request to alter the meter arrangements (downstream of Point of Connection (PoC)) with no change to overall requested capacity.

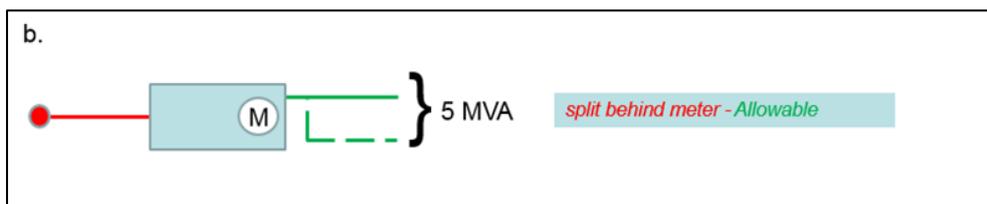
- 4.4 Responses to the previous consultation suggested that further clarity is needed on this scenario. Note that this scenario focuses on PoS alterations without changing the overall requested capacity – changes to capacity are considered in scenario 3.
- 4.5 The diagrams below show the ‘original request’ and two variants to the original request ‘a’ & ‘b’ that can occur downstream (i.e. within the premises boundary) of the Point of Connection (PoC).
- 4.6 **The ‘original request’** shows a single cable connection to a single metering point (Point of Supply (PoS)).



- 4.7 **The first variant ‘a’** shows the capacity split between two cable connections with each cable connected to its own individual metering point. This allows the 5MVA demand/output to be split or apportioned between the two cables with each cable feed metered separately.



- 4.8 **The second variant ‘b’** shows the capacity split across two cable connections with both cables connected to a single metering point. This allows the 5MVA capacity to be split/apportioned across two cables feeds with both metered at the same metering point.



Impact on Queue Position:

Scenario 2	Change Type (Variant)	Impact on Queue Position		
		Post Application - Pre Offer	Post Offer –Pre Acceptance	Post Acceptance – Pre Energisation
Request to alter the meter arrangements (downstream of Point of Connection (PoC)) with no change to overall requested capacity.	a) Split connection into two or more connection/metering points (no change to capacity)	Original PoS retains position in connection queue. Additional PoS is disallowable and treated as a new connection request.	Original PoS retains position in connection queue. Additional PoS is disallowable and treated as a new connection request.	Original PoS retains position in connection queue. Additional PoS is disallowable treated as a new connection request.
	b) Split capacity (total unchanged) across two or more customers utilising one connection/metering point	Allowable	Allowable	Allowable

4.9 **Rationale:** If a customer wishes to change between any of the connection designs illustrated above, provided there is no increase in capacity (MVA), then other than for variant ‘a’ it is considered to constitute an Allowable Change.

4.10 Under variant ‘a’ the queue position for the original point of supply (PoS) would be retained but the additional second metered point of supply would be treated as a new connection request and constitute a disallowable change. This would also result in any un-utilised capacity under the original connection request being relinquished.

4.11 This approach is consistent with the impact on the design of the NWO’s network assets required under the original application or on any technical aspect of the connection, for example, it would not result in a change to any reinforcement that may be required under the original application, safety systems, fault level, harmonic contribution, etc.

Question:

8. Does this provide sufficient clarity on how the type of request for change shown in this scenario will impact on a project’s position in the connections queue?

Please provide evidence to support your response.

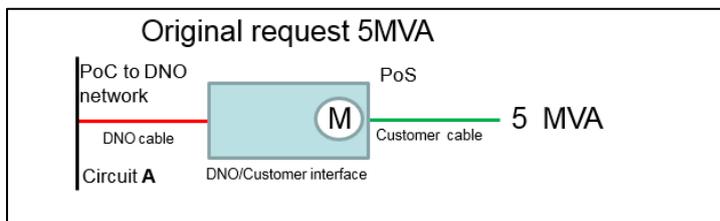
Change Request Scenario Three

Scenario Three: Request to alter capacity (MVA)

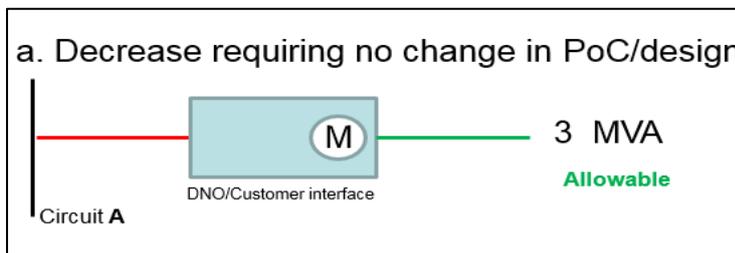
4.12 Responses to the previous consultation suggested that further clarity is needed to support the conclusions in respect of this scenario.

The examples below use a 5 MVA capacity 'original request' and three variants to the original request.

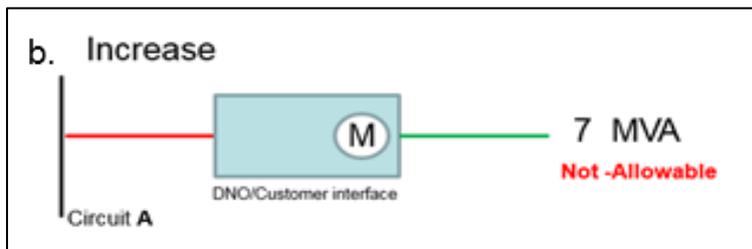
The 'original application request' shows a 5 MVA capacity with a Point of Connection (PoC) at Circuit A.



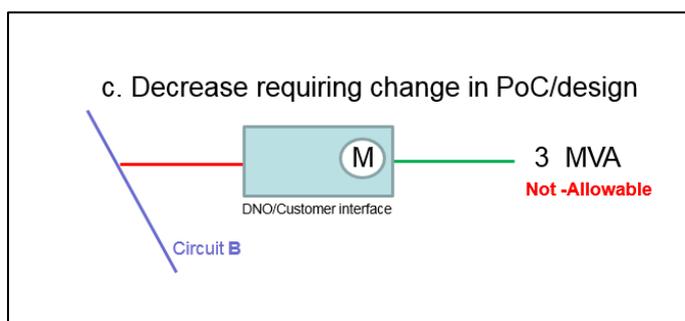
The **first variant (a.)** shows a decrease in capacity with no change to the Point of Connection (PoC) (Circuit A).



The **second variant (b.)** shows an increase in capacity with no change to the Point of Connection (PoC) (Circuit A)



The **third variant (c.)** shows a decrease in capacity with a change to the Point of Connection (PoC) (Circuit B)



Impact on Queue Position:

Scenario 3	Change Type (Variant)	Impact in Queue Position		
		Post Application - Pre Offer	Post Offer –Pre Acceptance	Post Acceptance – Pre Energisation
Request to alter capacity				
	a) Decrease in capacity requiring no change in PoC/design	Allowable	Allowable	Allowable
	b) Any increase in capacity requiring no change in (PoC)/design	Disallowable	Disallowable	Disallowable
	c) Decrease in capacity with a change to the (PoC)/design	Disallowable	Disallowable	Disallowable

Rationale:

- 4.13 An increase in the requested capacity or a change to the Point of Connection (PoC) will impact on the network in that area and therefore may affect other projects that may already be in the connections queue. This will require the NWO to undertake a reassessment / redesign study in the area.
- 4.14 Where a reduction in capacity does not result in the need to change the PoC it will not have a detrimental impact on other projects in the connections queue and is an Allowable Change. It may also result in other projects connecting earlier and/or at less cost than would be the case under the original connection request.
- 4.15 Consequently, we consider that any request to increase capacity or to change the PoC is NOT an Allowable Change and will result in loss of a project’s position in the connections queue. Note that the request to change may not require a new application form to be submitted if all other aspects of a project remain unchanged.

Question:

9. Do you agree with the proposed approach for each of the scenario variants?

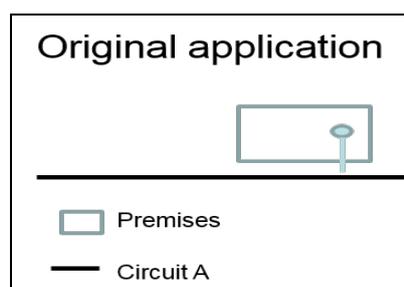
Please provide evidence to support your response.

Change Request Scenario Four

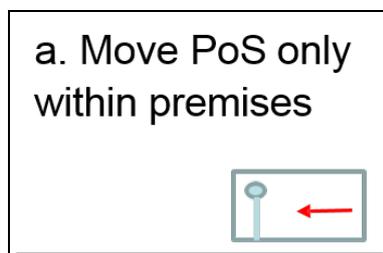
Scenario Four: Request to change location of Point of Supply (PoS)

- 4.16 Responses to the previous consultation suggested that further clarity is needed on the scenario that considers a change to the location of the Point of Supply (PoS) in relation to the premises.
- 4.17 The diagrams below show a number of locational changes that can be made to a project’s PoS relative to the original premises boundary. Where any change to the location of the PoS is wholly within the original premises boundary and does not require a change to the PoC, then this constitutes an Allowable Change (subject to the overriding principles). Therefore, a change to the PoS that results in a change to the PoC is considered NOT an Allowable Change and queue position is lost. Similarly, any change that locates the PoS outside of the original premises boundary is considered NOT an Allowable Change and queue position is lost.
- 4.18 Note that consistent with the definition used in the Electricity Act 1989 (as amended) the term “premises” includes any land, building or structure. The scenarios used apply this definition with the inference that the “premises” constitutes the “development boundary” of a project.
- 4.19 In circumstances where the “development boundary” spans a significant area, for example potentially several kilometres, it should be recognised that there may be limits to what can reasonably be considered an allowable change even where relocation of a PoS is within a project’s original premises/development boundary. For example, in this type of scenario any relocation of a PoS may change the circuit that the connection is to be made to and therefore the queue position would be lost.
- 4.20 The examples below show an ‘original request’ and three variants to the original request.

The original request shows the Premises and Point of Supply for the project with a Point of Connection at Circuit A.



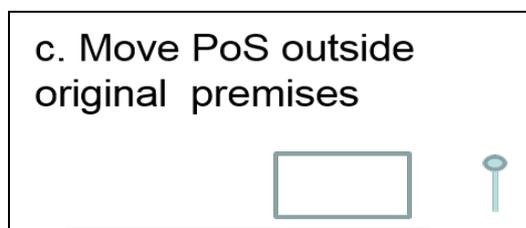
The **first variant (a.)** shows a change to the location of the Point of Supply (PoS) with the new location of the PoS being within the boundary of the premises as provided in the original application. No change to the Point of Connection (PoC)



The **second variant (b.)** shows a change to both the location of the Premises and the Point of Supply (PoS) with the new location of both the Premises and the PoS different to those provided in the original application.



The **third variant (c.)** shows a change to the location of the Point of Supply (PoS) to outside the Premises provided in the original application.



Impact on Queue Position:

Scenario 4	Change Type (Variant)	Impact on Queue Position		
		Post Application - Pre Offer	Post Offer –Pre Acceptance	Post Acceptance – Pre Energisation
Request to change location of Point of Supply (PoS)	a. Move PoS only within original premises (no change to PoC)	Allowable	Allowable	Allowable
	b. Move premises & PoS	Disallowable	Disallowable	Disallowable
	c. Move PoS outside original premises	Disallowable	Disallowable	Disallowable

- 4.21 **Rationale:** NWOs accept that as a project develops, there may be some circumstances whereby customers need to change the location of the premises, for instance for planning permission or as particular characteristics of a site become better known. NWOs will do all they can to ensure that this can be accommodated.
- 4.22 Where a change to the location of the PoS does not require a change to the PoC and is within the original premises boundary then this will be considered an Allowable Change.
- 4.23 Where the proposed new location of the PoS is wholly or partially outside of the premises boundary in the original application (regardless of whether or not there is a change to the PoC) this will NOT be considered an Allowable Change and a project will lose its position in the connections queue and a new application will be required.
- 4.24 We consider that this approach will drive customers to undertake reasonable research and validation on the location of the project prior to submitting a connections application to the NWO. This leads to a more efficient use of NWO time and resources for all stakeholders.

Question:

10. Do you agree with the proposed approach for each of the scenario variants?

Please provide evidence to support your response.

Responses

Responses should be submitted to the ENA Secretariat by 9th March 2018 by email to john.spurgeon@energynetworks.org

Next Steps

The DER Connections Steering Group will consider the responses received and produce a final 'Best Practice' document that NWOs will decide individually how to implement.

Appendix 1

Overriding Principles used under the previous consultation

1. Any request that has a detrimental impact on other applicants will generally be regarded as a material change.
2. Where a request is regarded as a material change but does not have an impact on other applicants, the DNO will engage with the applicant to resolve (this may require a new application to be made).
3. A change in the Point of Connection (PoC) relates to a change in circuit connectivity and not for example, a request to move from outside 2 Acacia Avenue to outside 4 Acacia Avenue, or from pole 57 to pole 58. If a PoC moves from one circuit to another, it will be regarded as a material change.
4. If a customer wishes to change its application from one where the DNO undertakes the full works to one where an Independent Connection Provider (ICP) undertakes part of all of the works (or vice-versa) they will be permitted to do this once. If they try to do so twice, it will be treated as a material change and a new application required.
5. Where there is a fundamental change to the operational profile of the connection, for example from import only to export this will be treated as a material change.

Note: Responses to the previous consultation were strongly supportive of all of the principles except Principle 4 (above). We have therefore decided to remove Principle

Appendix 2

Eight change request scenarios used under the previous consultation

The original eight change request scenarios are shown below:

1. Change in generation type or technology mix;
2. Change to split of requested capacity;
3. Change in requested capacity;
4. Change to site boundary;
5. Change in supply point/metering point location;
6. Change of Point of Connection (PoC);
7. Change to requested offer type (where multipart/convertible quote provided);
8. Change to requested offer type (where only Competition in Connections ` quote originally requested).

Feedback from previous consultation and proposed revisions to change request scenarios

The DER Connections Steering Group's analysis of responses to the previous consultation suggested that the original change request scenarios would benefit from a number of changes. These are summarised below and are intended to provide greater clarity, simplification and consistency with changes to the Overriding Principles.

Summary of suggested changes to the original scenarios:

Scenario 1 the wording could be improved/made clearer;

Scenario 2 greater clarity is required;

Scenario 3 more information should be provided to support this scenario;

Scenarios 4 and 5 could be combined but would need to be redefined;

Scenario 6 needs further work;

Scenarios 7 and 8 are no longer required on the basis that the original 'Overriding Principle 4' is removed.