

Respondent Details

Company Name:	PowerCon (UK) Ltd
Respondent Name:	Mr Bob Weaver
Designation:	Director
Address:	
Phone Number:	07557345243
Email Address:	bw@powercon-c.com

No.	Question	Your response	Consent to Publish Response (Y/N)
Q1	How would you define 'contestability'?	With regard to contestability in the connections marketplace we would suggest that contestability could be defined as meaning the independent construction and commissioning of connection assets following which the network owner (NIE) takes ownership of those assets. This would only be undertaken where the assets are constructed to agreed standards and by accredited Independent Connection Providers(ICP's). Consideration should also be given to situations whereby assets are not adopted by the DNO but are, in preference, adopted by an Independent Distribution Network Operator (IDNO).	Yes
Q2	What do you see as the main benefits of introducing contestability in new connections: A) To the consumer? B) To your company?	As has been indicated in the main document the benefits of contestability may include but are not limited to: # increased customer choice and potentially better customer service ; # improved connection times; # clarity and transparency in charging regime; # increased innovation # potential for achieving renewables target; and # reduced financing/operating costs.	Yes
Q3	What is the nature of your company's business?	Powercon (UK) Ltd act in a capacity as grid connection developers, consultants and agents for the connection of all technologies associated with demand and distributed generation. We also act as grid experts to the Renewable Energy Association and the Solar Trade Association. We are also members of the (Ofgem) Electricity Connections Steering Group, (ECSG) the DG Steering Group and the Distribution Charging Methodology Group.	Yes
Q4	What is your role in making new connections to the electricity network... A) At present? B) In the future?	A&B : (1) Consultancy on behalf of multiple clients to facilitate grid connections to both demand , distributed generation(DG) and renewable energy projects . (2) Supporting the work of customers, developers and trade associations with regard to the review of policy associated with the connection, strategy, technical and charging arrangements for DG connections.	Yes
Q5	What past experience do you have in making new connections to the electricity network... A) in Northern Ireland? B) or elsewhere? (Please state location)	A : Nil B: Significant regulatory experience in bringing competitive connections to the marketplace within the remainder of the UK including the reconciliation of technical, commercial and operational considerations. Significant 'hands-on' experience with hydro, wind, AD and PV projects from concept, application and technical /grid negotiation and within each of the DNO Licenced areas.	Yes
Q6	What type of connections are you interested in?	Essentially demand and DG connections with a particular emphasis on solar (PV). Whilst we are not directly associated with un-metered connections we would consider that there is every reason to include them in a competitive connections environment.	Yes
Q7	Should contestability be applied to: A) Transmission and distribution connections? B) Onshore and offshore connections?	Contestability should be considered and, if applicable, applied to all connection types and this should follow detailed discussions with the various stakeholders. The relevant stakeholders should be those indicating an appetite to undertake the connections work as potential Independent Connection Providers (ICP's) and also those customers / developers who would be responsible for commissioning the works.	Yes

No.	Question	Your response	Consent to Publish Response (Y/N)
Q8	To what extent should different rules apply to Transmission Network Operators and Distribution System Operators?	We see no reason that different rules should apply between TSO and DNO's - accepting the potential for differing technical and operational considerations.	Yes
Q9	To what extent should different rules apply to offshore connections and onshore connections?	No view or comment offered on the question posed. However it should be a consideration that any work offered within the contestable arena would have an expectation of reasonable work volume and reasonable expectation of attracting market participants - which may not be the case with offshore connections work ?	Yes
Q10	What industry codes would require updating to facilitate contestable connections?	The amount of work that would be required to facilitate the introduction of competitive connection should not be underestimated. With regard to Industry Codes - the review of existing Standard Licence Conditions, provision of new GSoP standards, review of the existing Charging Statements, provision of DG (Customer) Guidance documents and Regulatory Instruction Guidance documents. There would also be a requirement to introduce an accreditation scheme for participant contractors with the associated documentation and infrastructure to support this operation. Perhaps it is fortuitous that the majority of the documentation and infrastructure is available - assuming that it is possible to review the existing infrastructure already in place within that created by Ofgem? With regard to the regulatory environment we would suggest that a Grid Strategy should be set in place (early in any process) to define exactly what is proposed and expected with regard to generated capacity, grid saturation and the potential for network reinforcement. There are lessons to be learnt from the lack of a strategy within the remainder of the UK.	Yes
Q11	What works should be deemed as non-contestable?	We are of the opinion that (ultimately) the majority of the connection for sole use assets should be considered to be contestable. Experience has indicated that reinforcement of existing assets, where there are safety concerns, will be more problematic. Initially it may be appropriate to make the work associated with the 'final connection' and the determination of the point of connection as non-contestable works. Clearly there would need to be a willingness to actively participate and the realisation of the work required by all stakeholders in order to get to this position.	Yes
Q12	How should operations and maintenance be managed during the lifetime of a contestable asset?	Within the remainder of the UK it is the practice to transfer the ongoing liability of the contestable asset (operations and maintenance) to the DNO as part of the final commissioning process with built in safeguards to protect the interests of the DNO. This provides clarity and transparency to all interested parties and also a clear demarcation with regard to ongoing H&S and operational responsibilities. Since this arrangement has proved to be successful we would suggest that this is worthy of consideration	Yes
Q13	Should different degrees of contestability be introduced for each connection type?	The scope of the contestable works needs to be set out and agreed as part of the detailed competitive connections 'design' process. Thereafter, and for example, whilst connections to LV mains cables may be considered to be acceptable as a contestable item it could be assumed that (at the outset) connections to HV and EHV circuits would remain as non-contestable items due to technical and/or operational constraints	Yes
Q14	What are the barriers to introducing contestable connections?	Based on the previous experiences within the remainder of the UK there should be few barriers to introducing contestable connections - assuming a willingness on the part of all stakeholder to set in place the required infrastructure and thereafter embrace the process and a willness on the behalf of the Regulator to facilitate and mediate on the contentious issues that are guaranteed to arise.	Yes

No.	Question	Your response	Consent to Publish Response (Y/N)
Q15	What is the current impact of not having contestability in the connections market?	The impact of not having a marketplace for contestable connections could perhaps best be described as supporting the reverse of the answers provided in Q2 above. Essentially the current arrangements are that of a monopoly service provider - with all that that implies. One could also question whether the current arrangements are considered by the Regulator and stakeholders to be satisfactory, suitable, efficient, cost effective and are providing an output to satisfy the existing regulatory targets?	Yes
Q16	What is your view of best practice in regard to contestable connections?	The current arrangement as employed within the remainder of GB has proved to be a reasonably efficient, effective and acceptable as a way forward - noting that there are still issues that require review and reconciliation.	Yes
Q17	What type of arrangements would achieve the right balance between contestable and non-contestable works?	Clearly in a competitive environment customers and developers should have the benefit of placing their connections work as best benefits their requirements. This assumes that : # both the incumbent DNO and the Independent Connection Providers (ICP's) would have equal opportunity to bid for the competitive connections work on a fair and equal footing and # that the non-contestable elements of the work are suitable, well defined, reasonably priced, produced in a timely manner and, if necessary, regulated.	Yes
Q18	What problems could arise from the introduction of contestability?	Within the remainder of the UK problems have arisen during the period of transition to making competitive connections 'business as usual'. However, the formation and ongoing work of the Electricity Connections Steering Group (ECSG) has proved to be a useful vehicle to discuss and resolve issues and problems relating to both contestability and connections in general.	Yes
Q19	How much of a factor is the cost/timing of a new connection in regards to setting up a business/generator?	We would place equal weighting between obtaining the grid connection (cost and timing) and the work associated with obtaining LA Planning Approval - noting that both are critical to the success of the project. We would suggest however that there is a greater level of uncertainty, cost and time expended in obtaining the grid connection.	Yes

No.	Question	Your response	Consent to Publish Response (Y/N)
I1-1	Describe your issue		
I1-2	How often does this issue arise?		
I1-3	Where does the issue arise?		
I1-4	What more could be done to deal with the issue?		
I1-5	Why can't the issue be dealt with or what are the barriers to implementing change?		
I1-6	How has delivery of your connection been affected by this issue?		

No.	Question	Your response	Consent to Publish Response (Y/N)
I2-1	Describe your issue		
I2-2	How often does this issue arise?		
I2-3	Where does the issue arise?		
I2-4	What more could be done to deal with the issue?		
I2-5	Why can't the issue be dealt with or what are the barriers to implementing change?		
I2-6	How has delivery of your connection been affected by this issue?		

No.	Question	Your response	Consent to Publish Response (Y/N)
I3-1	Describe your issue		
I3-2	How often does this issue arise?		
I3-3	Where does the issue arise?		
I3-4	What more could be done to deal with the issue?		
I3-5	Why can't the issue be dealt with or what are the barriers to implementing change?		
I3-6	How has delivery of your connection been affected by this issue?		