

Energy Networks Association
4 More London Riverside
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1 March 2021

Sent by email to: opennetworks@energynetworks.org

Dear Sir/Madam

Open Networks Project – 2021 Workplan consultation

Thank you for the opportunity to share our views on the work the Open Networks Project plan of work for 2021.

We broadly support the work topics covered in the Project Initiation Document (PID). We welcome the way in which the ENA has increasingly shaped the PID to respond to concerns raised by stakeholders. The contents of the 2021 PID broadly aligns with the areas that Centrica believes needed prioritisation – in particular the planned work to address stakeholder concerns about the use of Active Network Management (ANM).

The comments made in our response to the 2020 Flexibility Consultation still stand. We also support the Association of Decentralised Energy (ADE) planned response which comments on the individual products in detail. At this point in time I only want to highlight some key points for Centrica:

- **External Dependences and Interfaces** – where there are dependencies at product level, especially where networks feel these prevent them from meeting stakeholder asks, networks should articulate why these are act as a barrier to progress to individual products. This applies equally to constraints from existing regulation (e.g. RIIO-ED1) or uncertainties from live policy development areas (e.g. ED2, Access and Forward-Looking Charges SCR).
- **DSO Implementation Plan** – We welcome the planned improvements to make this tool more accessible. We would still like to see more detail on where the work to deliver the actions is taking place.
- **DNO and DSO Conflicts of Interest** – removing or mitigating real and perceived conflicts of interest for network operators remains a key ask for Centrica. This has not been properly addressed in the guidance Ofgem provided to DNOs for RIIO-ED2. We still believe that more prescriptive guidance is needed from Ofgem on ‘what good looks

like' for DNOs when managing conflicts of interest. Several DNOs have made commitments in their own DSO strategy papers for ED2 – such as separating teams. We welcome these – but they are at such high level that without detail on the mechanics of implementation it is impossible to judge if they will be enough. There is clear gap in both the guidance from policymakers and implementation plans from individual DNOs. WS3 P2 could help fill this gap by identifying appropriate mitigation measures and ensuring these are described in enough detail.

- **Baseline Methodologies** – The ONP should explore the concerns raised by stakeholders on the baseline recommendations that came out of the 2020 P7 work during the February 2021 webinar (WS1A P7 Ref A).
- **Harmonisation of DNO approaches to A&D fees** – the inconsistencies in DNOs' application of A&D fees across DNO regions remains a concern to stakeholders. It would make sense for a resolution to be found to this via Open Networks, given that the ONP has driven standardisation in other areas relating to the connections journey. Centrica finds it difficult explaining to customers looking to connect low-carbon assets at multiple sites covering different DNO areas why they are being charged significantly different amounts for the same work in different regions. We have raised this point several times before.
- **Visibility of other ENA groups**
 - Can materials and minutes from the DER Connections Steering Group be published in the same way that the ONP Advisory group and DER Technical Group are?
 - We would like to see the ENA Data Working Group providing regular updates to the ONP Advisory Group and stakeholders more generally, not just the ONP Steering Group.
- **New ENA website** – the initial difficulties in locating documents relating to previous Open Networks products and past consultations have lessened. Thank you for responding to stakeholder comments and adding a record of past Open Networks key outputs and consultations by year. Could a similar record be added for Gas Goes Green and Modernising Energy Networks Data?

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I hope you find our response useful. If you would like to discuss anything in further detail please contact me at helen.stack@centrica.com or 07979 567785.

Yours sincerely

Helen Stack
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