Responses to Request for Information from Suppliers and Distributors for Issue 43 'Provision of on-site generation during planned outages'

Request issued on 14 November 2011

We received responses from the following Parties:

Company	Role
Electricity North West Limited	Distributor
ESP Electricity	Independent Distributor
ScottishPower	Supplier and Distributor
Npower Limited	Supplier
The Electricity Networks Company	Distributor
Northern Powergrid	Distributor
Western Power Distribution	Distributor

Responses from Suppliers:

Supplier Question 1: How many times (if any) during the last 2 years have you encountered the scenario described in the attached document?

Respondent	Response
ScottishPower	ScottishPower Energy Retail have not encountered the scenario described in Issue 43 within the last 2 years.
Npower Limited	We have not encountered this problem in the last two years.

Supplier Question 2: What was:

a) The duration of the planned outage(s) concerned?

b) The volume of energy involved? (please specify whether the site was Half Hourly or Non-Half Hourly)

Respondent	Response
ScottishPower	N/A.
Npower Limited	N/A.

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Supplier Question 3: What brought the situation(s) to your attention? (e.g. customer disputing a bill, notification by the Distributor)

Respondent	Response
ScottishPower	N/A.
Npower Limited	N/A.

Supplier Question 4: If notified by the Distributor, was this:

a) Through a specific data flow (if yes, please state which); or

b) By another means (please state which – e.g. phone, email).

Respondent	Response
ScottishPower	N/A.
Npower Limited	N/A.

Supplier Question 5: What action (if any) did you take to address:

a) The 'double-billing' issue for the customer?

b) The resulting Settlement volume?

Respondent	Response
ScottishPower	N/A.
Npower Limited	N/A.

Supplier Question 6: Do you ever receive the D0164 flow from a Distributor?

If yes, in what situations?

Respondent	Response
ScottishPower	We have not received the D0164 flow from a Distributor.
Npower Limited	We have never received a D0164.

Supplier Question 7: Do you ever send the D0166 flow / receive the D0167 flow? If yes, in what situations?

Respondent	Response
ScottishPower	We do not send the D0166 (or receive the D0167) flow.
Npower Limited	We have never sent a D0167. We have received 2 D0166's (in 2002).

Supplier Question 8: Do you have an internal policy to cover the Supplier and/or customer impact of a planned Distribution outage? If yes, what is this?

Respondent	Response
ScottishPower	We do not expect to be notified prior to the event so do not have a specific internal policy for dealing with a planned Distribution outage. We would expect the Distributor to absorb the costs for any additional generation that is provided and for all units to continue to be registered through the meter and put through settlement. The customer then pays the Supplier as normal as if the supply

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Respondent	Response
	had never been impacted.
Npower Limited	-

Responses from Distributors:

Distributor Question 1: How many times (if any) during the last 2 years have you encountered the scenario described in the attached document?

Respondent	Response
Electricity North West Limited	None.
ESP Electricity	3 times in the past two years. Whilst not technically during times of a planned outage, ESPE have supplied sites with onsite generation, at the customers request and cost, prior to the point of connection (POC) being energised by the host distributor. This has affected domestic housing developments – but has been financed by the developer. In some cases meters were installed in premises and energised and therefore the developer would be paying for both the onsite generation and also at the meter points in the premises.
ScottishPower	ScottishPower Energy Networks have never encountered the scenario in the attached document.
The Electricity Networks Company	We have not encountered this scenario during the last two years.
Northern Powergrid	None. We do not connect generation equipment provided by customers in the manner described in the scenario.
Western Power Distribution	We are not aware of any similar instances; however this is not the sort of thing we would necessarily keep a record of.

Distributor Question 2: What was:

a) The duration of the planned outage(s) concerned?

b) The volume of energy involved? (please specify whether the site was Half Hourly or Non-Half Hourly)

Respondent	Response
Electricity North West Limited	N/A.
ESP Electricity	Whilst not a planned outage as such, but rather waiting for energisation at the POC by the host distributor, we feel the issues are similar and worthy of consideration. Generation was operational onsite for approximately 2 weeks in each of the 3 cases, with approx 36 NHH MPANs in total. The volumes of energy involved being considered minimal were not closely monitored by ESPE.
ScottishPower	N/A.

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Respondent	Response
The Electricity Networks Company	N/A.
Northern Powergrid	N/A.
Western Power Distribution	N/A.

Distributor Question 3: In what circumstances (and why) would you install on-site generation on the Distributor side of the Settlement Meter and charge the customer for this generation?

Respondent	Response
Electricity North West Limited	We have no recollection of ever doing this, and cannot see a valid reason to do so.
ESP Electricity	ESPE would not install on-site generation for planned outages unless specifically requested for assistance to do so by the customer (and at their own cost).
ScottishPower	ScottishPower Energy Networks would never install on-site generation on the Distributor side of the Settlement Meter and charge the customer for this generation. Following notification of a planned outage and the decision has been taken to provide on-site generation, ScottishPower Energy Networks will provide the generator and fuel at no cost to the customer. This will be connected to the Distributor side of the metering hence limiting the impact to the supply and customers will continue to settle their electricity costs in the normal manner.
The Electricity Networks Company	We only do this if we cannot get the upstream connection made and it was due to failures on the customer's part. In certain situations we have allowed the connection to be made without meters connected but the customer normally requires metering to be installed as they require this for their CML (Certificate of Mortgage Lenders) completion. The cost of the generation is far larger than any DUoS income we would recover that this is only done in exceptional circumstances and at the customers' request.
Northern Powergrid	We would use generators as follows: 1. Where we have restored supplies after a network fault and we want to support a large number of customers. 2. As above but for one customer who has particular needs, say a nursing or old folks home or a kidney dialysis patient. 3. In order to protect supplies to customer's who might otherwise be off supply whilst we do planned work on our network. In all three cases the generator and fuel would be provided by Northern Powergrid and no charge would be made to the customer for the generation.

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Respondent	Response
Western Power Distribution	We wouldn't.

Distributor Question 4: Do you currently notify the relevant Supplier(s) of a planned Distribution outage? If yes, do you do this for all planned outages or only some? (if only some, please state which and explain why)

Respondent	Response
Electricity North West Limited	No.
ESP Electricity	No, ESPE does not notify the Supplier of planned outages. ESPE notifies the customer directly by mail shot to the premises affected by the planned outage.
ScottishPower	We never notify Suppliers of planned Distribution outages, we inform customers up to 5 days before the incident.
The Electricity Networks Company	No.
Northern Powergrid	We do not notify the supplier, this is provided to the customer.
Western Power Distribution	No, we inform the customer. They may contact their supplier. If we were providing generation then the customer would not be going off supply so we would not tell anyone.

Distributor Question 5: If you currently notify the relevant Supplier(s), is this:

a) Through a specific data flow (if yes, please state which); or

b) By another means (please state which – e.g. phone, email).

Respondent	Response
Electricity North West Limited	N/A.
ESP Electricity	Not applicable.
ScottishPower	N/A.
The Electricity Networks Company	N/A.
Northern Powergrid	N/A.
Western Power Distribution	N/A.

Distributor Question 6: Do you ever send the D0164 flow to a Supplier?

If yes, in what situations?

Respondent	Response
Electricity North West Limited	Not one we use.

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Respondent	Response
ESP Electricity	Sending of the D0164 would be a manual process for ESPE and as yet, we have not had cause to send one. When a planned outage occurs in the future, we would not anticipate sending a D0164 to the Supplier and/or DC unless the numbers of customers affected were less than 10.
ScottishPower	We do not issue the D0164 flow to any Supplier.
The Electricity Networks Company	No.
Northern Powergrid	We are not aware of this dataflow.
Western Power Distribution	No.

Distributor Question 7: Do you ever receive the D0166 / send the D0167?

If yes, in what situations?

Respondent	Response
Electricity North West Limited	No.
ESP Electricity	We have never received a D0166 or sent a D0167.
ScottishPower	We have never received or issued a D0166 / D0167.
The Electricity Networks Company	No.
Northern Powergrid	We are not aware of this dataflow.
Western Power Distribution	No.

Distributor Question 8: Do you have an internal policy to cover the Supplier and/or customer impact of a planned Distribution outage? If yes, what is this?

Respondent	Response
Electricity North West Limited	Yes we do this will be covered by our operational maintenance team who basically hand deliver notifications to any affected customers ahead of the planned maintenance ensuring the notification message is received with all relevant information and contacts provided ahead of the outage and the time the work is estimated to take.
ESP Electricity	ESPE have an internal policy, documented in a local work instruction, to inform customers directly affected by a planned outage. The process is to provide at least 2 days notice of the planned outage by mail shot with information on how best to cope in the duration of the outage. For customers with Special Needs, and where we have been provided the information by the Supplier, we endeavour to also contact these customers by telephone to advise of the outage.

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Respondent	Response
	Our LWI states that where feasible, to also advise the Supplier (but not the DC) of the planned outage via the D0164. As this is a manual process for ESPE, we would expect to do this where less than 10 customers were going to be affected.
ScottishPower	Planned Distribution outages are covered under ScottishPower Energy Networks QUAL-10-204 (HV & LV Customer Affecting Planned Outage Procedure) The policy has been drafted to ensure that a consistent and efficient procedure is applied when managing and processing requests for planned outages on the HV/LV networks and that consideration of customer service requirements is central to the planning of outages. The Planned Outage procedure will ensure that: • Customer Hours Lost (CHL) as a result of pre-arranged outages are reduced to a minimum acceptable level • Multiple pre-arranged outages on the same section of network in any one year are minimised • Both internal and external performance targets are achieved • All customers affected by a planned outage of any duration are given clear notification and timely warning of any outages affecting them • Appropriate advice is provided to customers as to what actions to take during an outage • Outage Management performance is monitored and reported consistently The procedure consists of three key stages, as follows: 1. Outage Requesting & Authorisation 2. Incident Creation & Customer Notification 3. Running of the Outage Further detailed information can be provided on the policy if required.
The Electricity Networks Company	No policy regarding the supplier. With the customer however we have a policy of discussing the issue with the customer directly and then agreeing the way forward with them.
Northern Powergrid	Yes, for customer – it's the EGS4 process.
Western Power Distribution	Yes – our policy requires us to card the customer to inform them when we intend to carry out work that will result in them being taken off supply. It includes making any necessary arrangements for customers on the priority service register.

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Further comments provided by respondents:

Respondent	Comments
Electricity North West Limited	When generation is provided at the customers side of the meter we pay for the fuel used in all cases.
ESP Electricity	ESPE believes there should be an obligation on the customer (or company installing the generator) installing generation on site to cope with the planned outage to notify the distribution company. This would be for safety reasons where operatives could be affected by 'feedback' from the generator whilst working on the network.
ScottishPower	ScottishPower Energy Networks have a dedicated team that will respond to planned Distributor outages. Once notification is received that an outage is required, SPEN will notify customers in writing up to 5 days before the incident occurs. The Planning team will review the timescales and the customer impact of the outage. In addition, the regulatory penalties and costs will be considered. If it is decided that on-site generation is beneficial and cost effective, SPEN will absorb the cost of the generator hire and fuel. No direct costs will be passed to customers. Generators will be connected to the Distributor side of the metering. If it is decided that on-site generation is not cost effective or that the outage will have minimal impact on the customer base, customers are entitled to hire a private generator and connect this to the consumer side of the metering at the distribution board. Customers should never install generators on the Distributor side of the metering from a Health and Safety aspect and must never be allowed to export / spill back on to the network. Planned outages are covered by multiple policies, ensuring a consistent and robust approach to all situations involving HV and LV customers.
Npower Limited	-
The Electricity Networks Company	This issue appears to be so rare that we are surprised that it has been allowed to be raised. Our view is that this is a customer complaint and should be treated as such. The issue with settlements from this is so small as to be insignificant across the whole UK. The additional work to change this would be cost prohibitive and difficult to operate under all the scenarios when generators are connected.
Northern Powergrid	-
Western Power Distribution	No further comment.

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