



June 2018

Network Development Roadmap Consultation – innogy renewables UK response

Innogy renewables UK welcomes the opportunity to respond to your consultation on the Network Development Roadmap.

Please find our response to your specific questions below. If you have any questions please contact me,
Kind Regards,

Fruzsina

Policy Manager
Innogy Renewables UK Limited

Consultation Questions and Response

Q1: Do you consider there is value in expanding the *NOA* to allow network and non-network solutions across the transmission and distribution networks to compete to meet transmission network needs at least cost?

What are the downsides or complexities we should consider? How could we go further in promoting competition?

We welcome the principle of moving towards cross network (T&D) analysis and the SO's examination of both network and non-network solutions. This approach considers the electricity network as a whole. To be successful the SO needs to have access to good quality data from all network owners, which should be shared with the distributed energy resources. (we do not have any insights into whether this is already the case).

Q2: What do you see as the opportunities and limitations of bringing a probabilistic approach into analysis?

This makes sense for the ETYS – within the *NOA* we would expect the SO to have high certainty around what is needed over a short timescale).

Q3: Do you consider there is value in expanding the network needs covered by the *ETYS* and *NOA* to a greater extent across the year and to more regional voltage challenges? What are the downsides or complexities we should consider?

We welcome changes to the methodology that recognise the way that electricity network use has changed. Analysing the transmission network needs required to manage flows throughout the year rather than during the winter peak only is logical.

We have been calling for the SO to examine current zoning methodology for some time now. The current approach is arbitrary and the need for revising it is overdue. It is sensible that the SO makes a commitment to a regular systematic review approach. Please confirm when the rezoning will happen as it will impact charging forecasts.

Expanding the *NOA* to cover regional voltage challenges is also welcomed. Reactive power demand can only be managed regionally rather than nationally but the impacts of mismanagement would impact the whole system. Therefore the SO's role in analysing regional voltage challenges in collaboration with the regional network owners in each area makes sense. Applying ORPS default payment rate across all regions will not truly value the opportunity savings in avoiding BM actions so should be considered carefully. As a related ask – the ORPS rate should be reviewed in general.

Again this approach will hinge on transparent access to network data by the SO.

(On a related note - we are not comfortable with the idea that network companies naturally assume the role of aggregators in an attempt to offer non-network build solutions to regional voltage issues on part



of their connectees. As an owner of distributed assets we do not want to incur costs or provide free services which DNOs would then benefit from financially).

Q4: Do you consider there is value in expanding the *NOA* to cover system stability needs? What are the downsides or complexities we should consider?

We would welcome a comprehensive source of information on forecast system needs, plus additional transparent information on historic locational system stability actions. Ideally we would ask for a longer term trajectory of this to inform our investment decisions as we come to specify what technical specifications we want for future renewable generation and storage sites.

Q5: Which other network requirements do you consider the *NOA* approach could be expanded to cover in order to drive value to consumers? What are the key benefits and considerations?

No comment