

Guidance on allowable changes to applications and accepted offers for connection to WPD's Distribution System

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1. Background

Due to the nature of the activity, connections schemes may require some form of change to their initial requirements during the process from application to energisation. Often a customer requests what could be a substantial change to their scheme. Where this is the case we need to ensure that we treat all customers fairly and consistently, including other applicants whose schemes could be affected by the requested changes.

This guidance document outlines the principles that we apply where an applicant requests a change to their connection application or where a change is required due to circumstances outside the control of the applicant or WPD. It describes a number of common change request scenarios and whether we deem them to be allowable at either pre-acceptance or post-acceptance stage of the Connection Offer.

The guiding principle to be applied is that any allowed change should not be to the detriment of other applicants, particularly in any interactive queue or group of applications or accepted offers relating to the same relevant section of the network. Where there is no detrimental effect to other applicants we may allow the applicant to make a change without re-setting the application date (subject to our statutory and licence obligations referenced further on in this guidance). The term 'detrimental effect' relates to time and/or cost to connect and potential impact on the level or frequency of curtailment of other customers in the connections queue. The connections queue is made up of those customers wanting a new or augmented connection and who have either:

- an existing application that is not yet offered, or
- an open Connection Offer that is not yet accepted, or
- an accepted Connection Offer

Under some scenarios we may allow the applicant to retain their application date for the original request and submit a secondary request (with new application date) covering the change; for example where an applicant requests an increase in import/export capacity. Under this scenario, the Connection Offer for the additional import/export capacity will be inter-dependent on the Connection Offer for the original import/export capacity. It will also take a lower position in any interactive queue. Any agreement to do this will be solely at WPD's discretion. Requests to supplement an existing application will be treated in accordance with section 9 of this guidance document.

This guidance document was primarily created to cover requests to change applications to connect generation. The principles however, shall be utilised, as far as is appropriate, for demand connections too.

2. Fair and effective management of DNO connection queues

In November 2018 the Electricity Networks Association (ENA) issued a guidance document entitled *Fair and Effective Management of DNO Connection Queues: Treatment of Changes to Connection Requests Good Practice Guide* (the 'Good Practice Guide'). The purpose of the Good Practice Guide is to outline good practice approach for DNOs on queue management and to outline what changes an applicant can make to a project after a connection request for it has been made, while maintaining the project's place in the connection queue.

The Good Practice Guide was developed with the help of the ENA's Distributed Energy Resources (DER) Connections Steering Group and has been subject to wider consultation with stakeholders.

This guidance document sets out WPD's approach and incorporates the high level principles included within the Good Practice Guide.

3. How to use this Guidance document

The following tables set out a number of common scenarios for requests to change the original application and WPD's position on whether or not such a change is allowable.

Where a change is deemed to be allowable WPD may charge for additional costs incurred in undertaking further assessment, system analysis, design, documentation preparation, procurement and installation of the connection.

Where more than one scenario applies to the same application all tests must be passed for the request to be deemed allowable.

For the avoidance of doubt the following terms are defined as follows:

Point of Connection (PoC); means the point or points of connection to WPD's existing distribution system.

Connection Point; means the point or points of connection at which electricity may (upon energisation) flow between the distribution system and the customer's installation

4. Change in required capacity

Change request	Sub-category	Allowable change with no change to queue position / new application date?	
		Pre-Acceptance stage (Yes / No)	Post-Acceptance stage (Yes / No)
Change in required capacity	Increase in required import and/or export capacity	No	No
	Decrease in required capacity (no change in voltage of the PoC)	Yes	Yes
	Decrease in required capacity (change in voltage of the PoC)	No	No

Where an applicant requests an increase in import/export capacity we may allow them to retain their original request and application date and submit a secondary request (with new application date) for the increase in import/export capacity. In this instance, the Connection Offer for the increased import/export capacity will be dependent on the Connection Offer for the original request. The applicant's ability to do this is solely at WPD's discretion and will not be permitted where the applicant is making a wholesale change to the nature of the installation and/or purpose of the connection.

An increase in export capacity will need to be communicated to NGET under the Statement of Works process, hence the impact will be unknown until this is completed. NGET may treat the additional export capacity as a new application so its queue position may change as a result of any NGET restrictions or works needed.

5. Change in PoC, Connection Point or Development Boundary

Change request	Sub-category	Allowable change with no change to queue position / new application date?	
		Pre-Acceptance stage (Yes / No)	Post-Acceptance stage (Yes / No)
Change in Connection Point/metering point location	New Connection Point within Development Boundary identified in original application	Yes	Yes
	New Connection Point within Development Boundary identified in original application that requires a change to the Point of Connection	No	No
	New Connection Point outside of Development Boundary identified in original application	No	No
	New Connection Point outside of Development Boundary identified in original application (Development Boundary of premise to be connected remains the same) where triggered by changes outside the control of the customer or WPD (e.g. land rights cannot be obtained for the required substation)	n/a	Yes
	Customer requested change in voltage of supply	No	No
Change in Point of Connection (PoC)	Customer requested change to POC position	No ¹	No ¹
	New POC position where triggered by changes outside the control of the customer or WPD (e.g. land rights cannot be obtained) and without detrimental impact on other applicants (Development Boundary of premises to be connected remains the same)	n/a	Yes ¹
	Customer requested change in PoC voltage	No	No
Change in Development Boundary	Change to the Development Boundary identified in original application including modifications (excepting where the new Development Boundary is wholly within the footprint of the original boundary) and complete re-sites	No	No

¹ A change to the PoC requiring a change in circuit will not normally be allowed. A change in PoC on the same circuit may be allowed depending on the revised location of the PoC.

An application for supply must define the premises to be connected. The definition of premises under the 1989 Electricity Act is any land, building or structure, therefore an application for connection must include a site map showing the footprint of land on which the building or structure is to be situated. This is the 'Development Boundary' and should largely reflect that as submitted to the local authority for planning permission. This is not the same as the landownership boundary.

6. Change in Technical Characteristics

Change request	Sub-category	Allowable change with no change to queue position / new application date?	
		Pre-Acceptance stage (Yes / No)	Post-Acceptance stage (Yes / No)
Change in generation technology type or mix	Without detrimental impact on other applicants in the relevant interactive queue and/or group of applications or accepted offers on the same relevant section of the network (except where there is an associated increase in export/import capacity, e.g. storage ²)	Yes ³	Yes ³
	With detrimental impact on other applicants in the relevant interactive queue and/or group of applications or accepted offers on the same relevant section of the network	No	No
Change in operating conditions (including installation of potentially disturbing loads)	Without detrimental impact on other applicants in the relevant interactive queue and/or group of applications or accepted offers on the same relevant section of the network	Yes	Yes
	With detrimental impact on other applicants in the relevant interactive queue and/or group of applications or accepted offers on the same relevant section of the network	No	No

- ² A change in technology type may need to be communicated to NGET under the Statement of Works process, hence the impact will be unknown until this is completed. NGET will treat a change in technology type or mix as a new application so its queue position may change as a result of any NGET restrictions or works needed.
- ³ We will generally allow a change in technology type where there is no detrimental impact on other customers. However, the change to energy storage, or adding it as additional equipment, creates additional design considerations, for example the impact of power swing/ramp rates on the distribution system and the change in load profile. Similarly, a request from the customer to change the rate of power swing will impact the step change and potentially the requirement for any associated reinforcement works. As a consequence of all the foregoing a new application will be required (with new application date) for all requests to change from any technology type to energy storage.

Change requests with major technical impacts, such as a change which significantly increases contribution to fault level or harmonic distortion may have a detrimental effect on other applicants in the connections queue and so will have to be assessed.

7. Split of requested capacity

Change request	Sub-category	Allowable change with no change to queue position / new application date?	
		Pre-Acceptance stage (Yes / No)	Post-Acceptance stage (Yes / No)
Split of requested capacity	Split of a connection into two or more Connection Points/metering points (maintaining overall capacity)	No ⁴	No ⁴
	Split of capacity across two or more customers utilising one Connection Point and metering point or multiple downstream metering points on the customer's network)	Yes	Yes

- ⁴ Where an applicant requests a split in to two or more Connection Points we may allow them to retain their original request and application date and submit a secondary request (with new application date) for the additional Connection Point. In this instance, the Connection Offer for the additional Connection Point will be dependent on the Connection Offer for the original request. This would also result in any un-utilised capacity under the original request being relinquished and allocated to the next person in the connections queue (which may or may not be the person requesting this change to split the supply). The applicant's ability to do this is solely at WPD's discretion.

8. Change in offer type

Change request	Sub-category	Allowable change with no change to queue position / new application date?	
		Pre-Acceptance stage (Yes / No)	Post-Acceptance stage (Yes / No)
Change in offer type	Change from a full works offer to a non-contestable POC only offer	Yes ⁵	Yes ⁶
	Change from non-contestable POC only offer to a full works offer	Yes ⁵	Yes ⁷
	Change in ownership of the proposed connection assets to another licenced DNO which necessitates a change in the Connection Point (including where the new Connection Point is outside of the Development Boundary)	Yes ⁸	Yes ⁹

⁵ applicants can receive a dual offer which provides both options upfront so no change required.

⁶ subject to any additional fees required for design approval and inspection on a CiC offer.

⁷ subject to additional fees for consents/survey/route marking and potential delays for sourcing plant and apparatus. The applicant's ability to do this is solely at WPD's discretion as previously agreed timescale for connection and energisation may need to be revised. See also section 10 – Associated Changes.

⁸ subject to additional fees for amending the original connection offer.

⁹ subject to there being no detrimental impact to other customers and to additional fees for amending the original connection offer and any other costs incurred, e.g. cancellation of plant order, etc. See also section 10 – Associated Changes.

9. Process for requesting a change to the original application

The applicant must submit any change request in writing, clearly setting out the required amendment(s) to their original application and where appropriate include supporting evidence to qualify the request. We will consider the applicant's request and provide an initial response outlining our agreement or otherwise as soon as reasonably practicable and in any case within 10 working days. Applicants may only keep their original application date where any extension in time required to process the revised Connection Offer does not have a detrimental effect on other customers in any associated interactive queue.

Requests made prior to issue of the Connection Offer

Where the request is made prior to the issue of the Connection Offer and we agree there is no detrimental effect to other customers, the change will be reflected in our Connection Offer. If the request is made prior to the commencement of any assessment and design work the customer may keep their original application date and we will deliver the Connection Offer in accordance with our statutory and licence obligations.

If we have already commenced assessment and design we will undertake to issue the Connection Offer as soon as reasonably practicable. Where however, the timing of the change request and/or the nature of the change request requires we undertake further detailed analysis, in order we meet our statutory obligations for providing Connection Offers, we may send a Connection Offer based on the applicant's original requirements and then at a later date provide a replacement Connection Offer based on the applicant's revised requirements. Applicants may only keep their original application date where any extension in time required to process the revised Connection Offer does not have a detrimental effect on other customers in any associated interactive queue.

Requests made post issue of the Connection Offer and prior to acceptance

Where the request is made post issue of the Connection Offer and prior to acceptance by the applicant and we agree there is no detrimental effect on other customers, we will issue a revised Connection Offer that varies the original. We will undertake to issue the revised Connection Offer as soon as reasonably practicable but in any case in accordance with our statutory and licence obligations.

Requests made post acceptance of the Connection Offer

Where the request is made post acceptance of the original Connection Offer and we agree there is no detrimental effect on other customers we will issue a variation to the original Connection Offer as soon as reasonably practicable but in any case in accordance with our statutory and licence obligations. The variation will reference both the original and new WPD enquiry reference number.

10. Associated Changes

Where we agree to an amendment post acceptance of the original Connection Offer the other terms and conditions of the Connection Offer will normally continue in full force and effect. For the avoidance of doubt, this will include any milestones set for obtaining planning consent, commencing the works and completing the works. Any requirement to extend the milestones as a consequence of the amendment will constitute a new application with new date of application unless there is no detrimental effect on other customers.

We may agree to extend milestones at our own discretion in accordance with our policy. If we agree to extend a missed milestone and circumstances dictate it, we may require the applicant to agree to additional changes under the variation to the Connection Offer. We will not exercise this requirement capriciously or arbitrarily. For further information please see WPD's guidance document on Connection Offer Milestones.