

Environment Report 2019/20
Detailed Commentary Associated
with the Annexes

Overview

This file contains the commentary associated with Annexes 1 to 7 to the Environment and Innovation 2019/20 report. In the context of the regulatory reporting process, the purpose of this commentary is to provide to the regulator, Ofgem, information supporting the data that we submit in the Environment and Innovation Reporting Pack (i.e. Annexes 1 to 7).

Annexes 1 to 7 and this associated commentary are an edited copy¹ of our annual submission to the regulator. The structure and content of this document reflect their specific purpose, and as a result are not suited for the reader looking for some general information. For that reader, we recommend the Environment Report.

Date of publication: October 2020

Associated documents:

- Environment Report 2019/20, Northern Powergrid, October 2020
- Annexes to the Environment report 2019/20, Northern Powergrid, October 2020
- Cost benefit analysis Tables, October 2020
- Regulatory Instructions and Guidance (RIGs) for RIIO-ED1, Ofgem, April 2020, available from: <https://www.ofgem.gov.uk/publications-and-updates/direction-make-modifications-regulatory-instructions-and-guidance-rigs-riio-ed1-version-60>

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¹ The edits consist in formatting changes to ease navigation and redaction of content that we agreed with the regulator were inappropriate for publication.

E1 – Visual Amenity

Allocation and estimation methodologies: detail any estimations, allocations or apportionments to calculate the numbers submitted.

We have updated Table E1, where the workload refers to the undergrounding of overhead lines within or around the borders of the national parks/areas of outstanding natural beauty that form our designated areas. We are reporting 3.21km of overhead line removed in Northeast and 10.42km in Yorkshire during 2019/20.

We have work programmes specifically used for recording costs and volumes of undergrounding work in our regions' designated areas, which allow us to separate the costs and activities of visual amenity from other undergrounding work. We have examined individual schemes to determine the correct voltage and the amounts of overhead conductor removed and cable installed. Other assets involved with the work, such as the count of overhead services and poles removed, and underground services installed have been noted in the asset register listing included in Table CV20. All the work undertaken is on LV or HV overhead circuits.

On examination of the schemes undertaken in 2019/20, we are able to confirm that all costs recorded arose from work carried out within the designated area. The schemes we have undertaken are within the boundary of the designated area concerned or are within the tolerance allowed.

Explanation of the increase or decrease in the total length of OHL inside designated areas for reasons other than those recorded in worksheet E1. For example, due to the expansion of an existing, or creation of a new, Designated Area.

There have been no new designated areas created or extended in 2019/20 nor, to our knowledge, any change in the geographical size of any individual area.

E2 – Environmental Reporting

Allocation and estimation methodologies: detail any estimations, allocations or apportionments to calculate the numbers submitted.

Table E2 provides volumetric performance statistics on the treatment of oil leakage and gas emissions alongside investments made in mitigating the effects of oil, SF₆ leakage and noise pollution.

Cost and Volumes categories

- In absolute terms, expenditure reported in E2 is low compared to some other tables, but this belies the fact that the overall investment made and outputs achieved in asset replacement (where the replacement of fluid-filled cables is reported), in flooding and in asbestos mitigation projects all produce important environmental benefits.
- The work reported in Table E2 has a specific environmental investment driver, and in 2019/20 we have carried out schemes to address noise pollution, to mitigate oil pollution (through remedial work on transformer bunds and by installing spills kits at our major substations), as well as to reduce SF₆ gas emissions. From next year, we expect to report on work carried out to remove

persistent organic pollutants (POPs), now reportable in Table E2.

- We have reported two interventions in Yorkshire and three in the Northeast on noise pollution mitigation. Oil mitigation schemes have been delivered at 33 sites in Yorkshire and 22 sites in the Northeast (on remedials on the oil bunds or spill kit installation). We have undertaken refurbishment of the EHV switchgear where the benefit of SF₆ leak reduction had been identified at one site in Yorkshire and two in the Northeast.
- Over the last three years, we have reported costs on Yorkshire overhead line schemes where we have been faced with significant excess costs associated with treatment of land contaminated by the impact of recovering our steel mast apparatus (Woodhouse Masts). It was discovered that they were coated in lead paint, which contaminated the soil underneath the offending apparatus.

Volumetric Measures

- Table E2 also includes a number of categories, against which we record Northern Powergrid's environmental performance.
- We recorded seven incidents requiring reporting to the Environment Agency (none of the incidents resulted in civil sanction); all in Yorkshire in 2019/20. All of these relate to fluid filled cables and all incidents were appropriately addressed in consultation with the Environment Agency.
- On SF₆ leakage, Table E2 records SF₆ emitted as a proportion of the total gas bank. We have updated the amount of our overall gas bank with the net asset additions in each licence. We have also applied the amount of gas emissions, which we record on our source systems, and the table calculates a gas emitted ratio of 0.09% in Northeast and 0.25% in Yorkshire in 2019/20. This represents an improvement in the Northeast and a very slight increase in Yorkshire. We will continue to utilise our SF₆ camera to further reduce our SF₆ loss in both licence areas.
- Moving on to the fluid used statistics; we record circuit kilometres, oil fluid litres and the amounts of oil top ups and recoveries. In order to calculate the fluid totals, we calculate the average value for litre per km for each cable core and voltage, taking account of a range of variables, including cable type, cable manufacturers' specifications and different types of site works. We have taken the circuit lengths of oil-filled cable at each voltage, using data taken from the asset register.
- We have also reported the audited values for net fluid used for top ups and fluid recovered that are recorded on our source systems. When these are entered on to Table E2, the result is that our ratios of fluid tops ups to the total in service is 0.77% for Northeast and 2.49% for Yorkshire in 2019/20. This represents an increase in performance in the Northeast and slight reduction in performance in Yorkshire.

DNOs must provide some analysis of any emerging trends in the environmental data and any areas of trade-off in performance.

The overall number of environmental events (those reportable to the Environment Agency and those that fall outside this category) has reduced since 2012 from 97 in the 2012/13 regulatory year (in Northeast & Yorkshire combined) to 54 in the 2019/20 regulatory year. Changing weather patterns and third party interference (such as metal theft) play a large role in this trend. Fluid and gas loss overall are both on continuing downward trends.

Where reported in the Regulatory Year under report, DNOs must provide discussion of the nature of any complaints relating to Noise Pollution and the nature of associated measures undertaken to resolve them.

We have completed the row in Table E2 relating to noise complaints. Of those calls, there are a number that result in formal complaints and remedial action in terms of mitigation schemes that are reported in Table E2. We have reported two interventions in Yorkshire and three in the Northeast in 2019/20.

Noise complaints are considered objectively, by performing site surveys and measuring sound levels across the audible spectrum at various points in the area the complaint was raised. A noise complaint is justified if specified noise levels, especially in the 100Hz range, are exceeded.

We examine each case in detail: this involves personal attendance at the site, taking the necessary readings and making an assessment of the best means of dealing with the nuisance. A variety of mitigation solutions are possible: acoustic doors, acoustic roof panels, acoustic louvres, anti-vibration pads – but we have faced situations where poor ventilation or restricted space between substation doors and the electrical equipment inside does not allow us to install the acoustic solution (indeed these sometimes might pose a risk as a climbing aid). In those circumstances we are left with re-siting the equipment (for pole mounted transformers) or full replacement of the transformer at a distribution substation, mindful of course for opportunities for other work at the site. Any work at primary sites is, by the very nature of the assets being treated, a much more specialised, complicated and expensive exercise. As such, noise complaints involving primary sites can take time to resolve.

We have reported two Yorkshire schemes in our volumes in Table E2:

- *Leeds, The Roundway*
Following a noise complaint the transformer was replaced with a Schneider “supersilent” transformer in order to mitigate the source of the noise and as an additional safeguard anti vibration pads were installed.
- *Wren Garth, Wakefield*
We lined the substation walls and doors with Fireseal acoustic foam in an effort to reduce the noise emitted from the transformer.

In the Northeast :

- *Newburn, Newcastle-Upon-Tyne*
We received a noise complaint from a customer regarding the existing outdoor transformer located at the Newburn substation. Site reports confirmed the complaint was justified and the existing transformer was found to be in need of replacement. The new transformer was located on a plinth two metres away from the existing position and was equipped with anti-vibration pads.

- *Heworth Stray, York*
We fabricated an acoustic vent cover and lined the substation wall to reduce the noise following a complaint from a customer.
- *Coulby Elmwood*
All substation doors and louvers were replaced for high specification acoustic ones to mitigate the impact of a noisy transformer.

We have noted 35 new noise enquiries in Table E2.

Where reported in the Regulatory Year under report, DNOs must provide details of any Non-Undergrounding Visual Amenity Schemes undertaken.

We can confirm that we have no non-undergrounding visual amenity schemes to report.

Any Undergrounding for Visual Amenity should be identified including details of the activity location, including whether it falls within a Designated Area.

No work has been undertaken other than under the Visual Amenity programme identified in Table E1.

Where reported in the Regulatory Year under report, DNOs must provide discussion of details of any reportable incidents or prosecutions associated with any of the activities reported in the worksheet.

We recorded seven incidents requiring reporting to the Environment Agency (none of the incidents resulted in enforcement actions or penalties); all of them in Yorkshire. All of these relate to fluid filled cables and all incidents were appropriately addressed in consultation with the Environment Agency

Where reported in the Regulatory Year under report, DNOs must provide discussion of details of any Environmental Management System (EMS) certified under ISO or other recognised accreditation scheme.

We are certified to ISO14001:2015 and have been subject to two surveillance audits during the regulatory year under report and no major non-conformances were identified.

DNOs must provide a brief description of any permitting, licencing, registrations and permissions, etc related to the activities reported in this worksheet that you have purchased or obtained during the Regulatory Year.

We have 3 bespoke permits and 4 standard oil only permits. We are a registered upper tier waste carrier, broker and dealer.

DNOs must include a description of any SF6 and Oil Pollution Mitigation Schemes undertaken in the Regulatory Year including the cost and benefit implications and how these were assessed.

We have carried out 55 of Gas and Oil Pollution Mitigation Schemes during 2019/20.

We have a programme engaged in the treatment of transformer oil bunds at major substations. In RIIO-ED1 and to date, we have not carried out full bund replacements, as we have carried out a programme of remedial works to remedy defects on existing bunds and the replacement and repair of bund pumps. This approach has had the benefit of achieving an earlier and cost efficient improvement in terms of reduced oil leakage and environmental clean-up at our sites. Following detailed analysis we have identified a number of sites where more

extensive remediation is required and therefore expect more substantial schemes over the second half of the price control.

Secondly, we install and replenish oil spill kits at substations, where there is a heightened risk of or requirement to deal with oil leakage. The kits provide a temporary measure until the leaks can be resolved or the plant replaced and contain all the equipment required for site staff to use should an oil leak occur. The increase in our reported volumes under oil mitigation reflects the fact that we have installed 35 kits this year along with the 20 bund remedials, making a total of 55 reported across both licences in Table E2.

As noted earlier, we have also undertaken remedial work at Yorkshire and Northeast sites to repair switchgear subject to SF₆ gas leakage. The driver behind this work is our commitment to directly address the gas leakages we have suffered in recent years.

Whilst we seek to protect and prevent interference as our top priority, it is recognised that the management of incidents is an inevitable outcome and therefore pollution containment measures are essential in reducing environmental, financial and reputational damage to Northern Powergrid. To ensure effective remediation we have a 24 hour environmental response support contract in place to attend for any and all environmental incidents as required.

E3 –BCF

Allocation and estimation methodologies: detail any estimations, allocations or apportionments to calculate the numbers submitted.

Data entry is in the form of base measurement and conversion factors. Such factors are the factors published by DEFRA in place on 31 March of the regulatory period being reported.

Where multiple conversion factors were required to calculate BCF within a particular category (e.g. due to use of both diesel and petrol vehicles), a weighted average of these factors has been entered.

Variations in volume of each fuel type between Yorkshire and North East will result in different weighted average conversion factors for similar categories. E.g. in Yorkshire a lower quantity of petrol was used for business transport and a larger quantity of diesel was used. Therefore the resultant overall weighted average conversion factor for this category for Yorkshire will be different to that of North East.

All Contractor figures are actual returns. No estimates have been made.

BCF reporting boundary and apportionment factor

DNOs that are part of a larger corporate group must provide a brief introduction outlining the structure of the group, detailing which organisations are considered within the reporting boundary for the purpose of BCF reporting.

Any apportionment of emissions across a corporate group to the DNO business units must be explained and, where the method for apportionment differs from the method proposed in the worksheet guidance, justified.

- All figures relate to the activities of the regulated business. All data is

collected in a form where it is attributed to one of the licensed distribution businesses. Corporate categories are allocated on a 50:50 basis.

- Business travel by bus, taxi and ferry have not been included as it believed not to be material.
- Refrigerant gas loss from air conditioning units has not been included. The amount is not believed to be material.
- Energy use at substations has been estimated.
- The company is audited on an annual basis to ensure compliance with the ISO 14064-1:2006 standard. This tests the management, reporting and verification of our greenhouse gas inventory.

BCF process

The reporting methodology for BCF must be compliant with the principles of the Greenhouse Gas Protocol.² Accounting approaches, inventory boundary and calculation methodology must be applied consistently over time. Where any processes are improved with time, DNOs should provide an explanation and assessment of the potential impact of the changes.

The reporting methodology for BCF is compliant with the principles of the Greenhouse Gas Protocol.

² [Greenhouse gas protocol](#)

Commentary required for each category of BCF

For **each** category of BCF in the worksheet (ie Business Energy Usage, Operation Transport etc) DNOs must, where applicable, provide a description of the following information, ideally at the same level of granularity as the Defra conversion factors:

- the methodology used to calculate the values, outlining and explaining any specific assumptions or deviations from the Greenhouse Gas Protocol
- the data source and collection process
- the source of the emission conversion factor (this shall be Defra unless there is a compelling case for using another conversion factor. Justification should be included for any deviation from Defra factors.)
- the Scope of the emissions ie, Scope 1, 2 or 3
- whether the emissions have been measured or estimated and, if estimated the assumptions used and a description of the degree of estimation
- any decisions to exclude any sources of emissions, including any fugitive emissions which have not been calculated or estimated
- any tools used in the calculation
- where multiple conversion factors are required to calculate BCF (eg, due to use of both diesel and petrol vehicles), DNOs should describe their methodology in commentary
- where multiple units are required for calculation of volumes in a given BCF category (eg, a mixture of mileage and fuel volume for transport), DNOs should describe their methodology in commentary, including the relevant physical units, eg miles.

DNOs may provide any other relevant information here on BCF, such as commentary on the change in BCF, and should ensure the baseline year for reference in any description of targets or changes in BCF is the Regulatory Year 2014-15. DNOs should make clear any differences in the commentary that relate to DNO and contractor emissions.

Building energy usage

- Data from electricity and gas bills relating to all the licensee's non-operational properties is collated by the facilities department. For non-half-hourly metered bills, the amount included is that billed in the quarter even if based on an estimated reading. A small number of buildings that are owned by a landlord are excluded. For gas the conversion factor for gross calorific value has been used.
- Own use at substations has been estimated for 2019/20. The figures have been built bottom up from the various components (heating, lighting, etc.), although the contribution of each component is an engineering judgement rather than a direct or sample measurement.

Operational Transport

- The main source of fuel reported here is used by the company's fleet, and data is collected from company fuel card use. Figures are collated for petrol, diesel, and LPG (when used).
- We also report volume of fuel stored onsite to fill the forklifts and logistics HGV vehicles.
- Other usage of fuel includes that used by contractors for their fleet and generators. Data on contractors' usage is compiled from returns sent in response to a request. See comments under Contractors.

Business Transport

- Business transport - road
- Data is collected from business miles claimed by staff monthly on their expense claim forms. The data is split between diesel and petrol according to the information provided on the claim forms. Corporate staff mileage is split 50:50 between licensees (to reflect the fact that such travel is undertaken on behalf of

both licensees equally).

- Business transport – rail and air

Staff wishing to make a business journey by train or air must formally request approval. Data from these requests is transferred to a spreadsheet where the mileage for each journey is calculated and then collated according to rail, domestic flights, short-haul international, and long-haul international. As mentioned above, figures relating to corporate staff are attributed 50:50 between licensees.

Fugitive Emissions

These figures are the same as those used in Table E2 and are the SF₆ emissions from the network.

Fuel combustion

This is the fuel used for generators by our contractors.

Losses

- This data stream uses the figures derived under the Balancing and Settlement Code arrangements and reported regularly to Ofgem.
- The volume of energy is converted in tonnes of carbon dioxide using the “Electricity – generation” (scope 2) factor provided by DEFRA.

Contractors

When reporting BCF emissions due to contractors in the second half of the worksheet please:

- Explain, and justify, the exclusion of any contractors and any thresholds used for exclusion.
- Provide an indication of what proportion of contractors have been excluded. This figure could be calculated based on contract value.

Please provide a description of contractors’ certified schemes for BCF where a breakdown of the calculation for their submitted values is not provided in the worksheet.

If a DNO’s accredited contractor is unable to provide a breakdown of the calculation and has entered a dummy volume unit of ‘1’ in the worksheet please provide details of the applicable accredited certification scheme which applies to the reported values.

Contractor figures are derived from actual returns provided by contractors utilised to undertake work on behalf of Northern Powergrid.

The number of generators used during the period increased from 2862 to 3573, an increase of 711 or 25%. The majority of this increase was for sets utilised on unplanned repairs in the Northeast.

Building energy usage

Natural gas, Diesel and other fuels are all categorised as fuel combustion and must be converted to tCO₂e on either a Gross Calorific Value (Gross CV) or Net Calorific Value (Net CV) basis. The chosen approach should be explained, including whether it has been adapted over time.

Substation Electricity must be captured under Buildings Energy Usage. Please explain the basis on which energy supplied has been assessed.

Own use at substations has been estimated for 2019/20. The figures have been built bottom up from the various components (heating, lighting, etc.), although the contribution of each component is an engineering judgement rather than a direct or sample measurement.

E4 – Losses Snapshot

Allocation and estimation methodologies: detail any estimations, allocations or apportionments to calculate the numbers submitted.

E4 includes:

- Activities where the costs incurred principally relate to managing distribution losses.
In practice, at this time, this will be restricted to actions to deal with relevant theft of electricity as we have no other investments solely to reduce losses.
- Activities where some of the costs incurred relate to managing distribution losses (but where losses are not the principal reason for the expenditure) excepting activities that may help to manage losses but where distribution losses are not associated with the DNOs decision to undertake the activity and where any losses benefits are purely coincidental. At present, we are focusing on two activities:

- 1) Quantifying losses savings between installing the 185mm² underground (UG) 11kV and LV cables and upsizing the size to 300mm².

We have been pursuing this option in our investment plans throughout ED1.

- 2) Quantifying losses savings of targeted replacement of pre-1958 distribution transformers with a Health Index of 3.

Our analysis shows that the costs associated with replacing a pre-1958 transformer with a more efficient modern transformer would be offset by the future losses cost savings within ten years of its replacement. Therefore we have decided to prioritise the replacement of pre-1958 distribution transformers as part of our existing asset replacement work programmes.

This supports our on-going drive to reduce technical losses on the network and supports an approach to the targeted replacement of pre-1958 distribution transformers identified by other DNOs within their business plans.

a. Underground cables

Volumes

Due to issues caused by the changeover to a new fully digitised mains records system for 2018/19 and 2019/20 (and the processing of system updates during that period), data is incomplete and the required level of detail is presently unavailable. Updates to the data covering both 2018/19 and 2019/20 are being worked upon by Information Management, and we expect that the data will be

available at the time of the 2020/21 submission.

Hence, for our E4 tables, we have submitted an average of the previous four years' activities at this time with the intention of updating the 2018/19 and 2019/20 figures in the 2020/21 submission.

Costs

- The estimated total costs in the E4 table are taken from the unit cost for cable replacement, and multiply the unit cost with the cable lengths installed.
- The differential between the 300mm² cable and 185mm cable is known. Together with the lengths of each type, the unit cost specific to each type can be calculated.
- This calculation is done for our underground 11kV cable and LV cables on both our Northeast (NPgN) and Yorkshire (NPgY) licences, giving four cost lines in total.
- Incremental costs associated with the losses initiative are taken from the CBA cost per meter and the volumes of 300mm² cable.

Losses benefits

Losses benefits (MWh) associated with the losses initiative are taken from the CBA losses benefit per meter and the volumes of the LV and 11kV UG 300mm² cables respectively.

Cost-benefit analysis (CBA)

The CBAs are based on the submitted RIIO-ED1 CBAs reviewed in line with the financial data (WACC) from the ED1-RIIO settlement and actual cable lengths involved.

By entering the actual cable lengths in the actual year of installation onto the Ofgem CBA tool, RIIO-ED1 benefit and a 45-year benefit can be obtained.

b. Pre-1958 distribution transformers

Costs

- This calculation is done for units on both our Northeast (NPgN) and Yorkshire (NPgY) licences, giving two cost lines in total.
- Incremental costs associated with the losses initiative are taken from the CBA cost per unit and the volumes of transformers.

Volumes

- Total transformer volumes are taken from the data provided by Investment Planning and Delivery and Systems Engineering teams.

Losses benefits

- Losses benefits (MWh) associated with the losses initiative are taken from the CBA losses benefit per unit and the volumes of the units.

Cost-benefit analysis (CBA)

The CBA is similar to the one described for cables, the only difference is that the input data is the numbers of units replaced in the actual year.

Programme/Project Title

Please provide a brief summary and rationale for each of the activities in column C which you have reported against.

Underground cables

The benefits of low loss design have usually been in the form of oversizing conductors (relative to existing utilisation levels), which can have the added benefit of improving network performance (i.e. voltage drop, current carrying capacity and earth loop impedance).

LV cable oversizing

At low voltage (230/400V), the use of 300mm² aluminium cables has been adopted as standard cable size for all mains other than spurs carrying less than 120A per phase in line with our RIIO-ED1 business plan submissions.

11kV cable oversizing

At 11kV, the use of 185mm² aluminium has been adopted as a standard network feeder size, with 300mm² aluminium used for the first leg from the primary substation and highly loaded feeders. In line with our RIIO-ED1 business plan submissions we are implementing the policy of installing a minimum cable size of 300mm² at 11kV where practical (e.g. if bending radii and termination arrangements allow). The use of 95mm² is only recommended in special circumstances, as it becomes uneconomical in terms of lifetime losses at greater than 100A peak loading.

Pre-1958 distribution transformer replacement

Our analysis shows that the costs associated with replacing a pre-1958 transformer with a more efficient modern transformer would be offset by the future losses cost savings within ten years of its replacement. Therefore we have decided to prioritise the replacement of pre-1958 distribution transformers as part of our existing asset replacement work programmes.

This supports our on-going drive to reduce technical losses on the network and supports an approach to the targeted replacement of pre-1958 distribution transformers identified by other DNOs within their business plans.

Primary driver of activity

If, in column E, you have selected 'Other' as the primary driver of the activity, please provide further explanation.

Cables and distribution transformers are replaced or installed as part of activities such as asset replacement, reinforcement, connections, visual amenity and faults volumes. These are the primary drivers.

Baseline Scenario

Please provide a brief description of the 'Baseline Scenario' inputted in column K for each activity.

Underground cables

The baseline scenario assumed each metre of cable actually installed as 300mm² was installed as 185mm².

Volumes were restricted to 300mm² cable which would otherwise have been 185mm². Any cable actually installed at a smaller size or that would have been the larger in any event was excluded.

On the CBA, only incremental costs were included so the baseline was a blank sheet.

Pre-1958 distribution transformer replacement

The baseline scenario assumed that the pre-1958 distribution transformers are still under service. They will only be replaced under the existing work programme due to poor health index (where the Health Index \geq HI4) and/or as a

consequence of other works at site, e.g. due to the condition of the LV board and/or HV switchgear and/or building and/or if it's closely coupled, i.e. where there are secondary drivers.

Use of the RIIO-ED1 CBA Tool

DNOs should use the latest version of the RIIO-ED1 CBA Tool for each of the activities reported in column C. Where the RIIO-ED1 CBA Tool cannot be used to justify an activity, DNOs should explain why and provide evidence for how they have derived the equivalent figures for the worksheet. The most up-to-date CBA for each activity reported in the Regulatory Year under report must be submitted.

Ofgem's version 4 CBA from the RIIO-ED1 business plan submissions was used. This is understood to be Ofgem's current version.

All CBAs show that one year of investment has a positive benefit over 45 years as shown in the table below.

	NPVs based on payback periods following one year investment (£m)			
	8 years	24 years	32 years	45 years
Overlaying LV cable with 300m ² wf (NPgN)	-£0.003	£0.06	£0.15	£0.192
Overlaying LV cable with 300m ² wf (NPgY)	-£0.002	£0.09	£0.23	£0.29
300m ² for all 11kv network feeders (NPgN)	-£0.02	-£0.01	£0.00	£0.01
300m ² for all 11kv network feeders (NPgY)	-£0.08	-£0.05	£0.02	£0.05

Changes to CBAs

If, following an update to the CBA used to originally justify the activity in column C, the updated CBA shows:

- a negative net benefit for an activity, but the DNO decides it is in the best interests of consumers to continue the activity, or
- a substantively different NPV from that used to justify an activity that has already begun.

the DNO should include an explanation of what has changed and why the DNO is continuing the activity.

For example, where the carbon price used in the RIIO-ED1 CBA Tool has changed from that used to inform the decision such that the activity no longer has a positive NPV.

N/A

Cost benefit analysis additional information

Please include a reference to the file name and location of any additional relevant evidence submitted to support the costs and benefits inputted into this worksheet. This should include the most recent CBA for each activity reported in column C in the Regulatory Year under report.

A summary of the CBA tables are included in this report.

E5 – Smart Metering

Allocation and estimation methodologies: detail any estimations, allocations or apportionments to calculate the numbers submitted.

Worksheet E5 records the following information:

- Pass-through Smart Meter Communication Licensee Costs and pass-through Smart Meter Information Technology Costs, plus any Elective Communication Services costs or Smart Meter Communication Licensee Costs outside of the price control, and
- DNOs' estimates of the benefits of smart metering for domestic and non-domestic customers using the categories set out in DECC's January 2014 Impact Assessment.

Commentary regarding pass-through Smart Meter Communication Licensee Costs and pass-through Smart Meter Information Technology Costs, plus any Elective Communication Services costs or Smart Meter Communication Licensee costs that are outside of the price control:

Smart Metering Communication Licensee Costs consist only of the monthly charges levied by the Data Communications Company (DCC). These are recorded against dedicated account codes in our financial recording systems allowing us to separate these costs from any other cost items.

We have not incurred any Elective Communication Services costs. These costs are payable to the DCC in respect of Elective Communication Services, which include services to or from a Smart Metering System that relate solely to the Supply of Energy (or its use), and services that are provided by DCC pursuant to a Bilateral Agreement (rather than the DCC User Interface Services Schedule).

We have not incurred any Smart Meter Communication Licensee costs that are outside of the price control. These costs are payable to the DCC in respect of optional data transaction fees relating to the use of Smart Meters that are at a DNO's discretion and may extend beyond the Smart Meter roll-out period.

Our 2019/20 Smart Metering Information Technology Costs consequently covered the:

- Initial portion of the cost of upgrading our smart metering IT user gateway to work with DCC Release 3.0.
- Licence update and support costs for our Oracle database software.
- Software and hardware support and maintenance costs for our smart metering IT user gateway.
- Cost of maintaining a Registration Data Provider (RDP) service.
- Cost of our project to i) provide Contact Centre agents with the ability to see smart metering outage alerts from within CRM and to check the supply status of a smart meter, and ii) provide a single source of data incorporating both smart metering supply status messages and network control system supply statuses.
- Cost of our project to integrate our main smart metering IT user gateway with our distribution network management system in order to allow our despatch staff, who assign our engineering repair teams to work activities, to check the supply status of smart meters at premises potentially affected by a power cut.

The implementation of our IT user gateway, the integration of this gateway with

our customer relationship management system, and the integration of the gateway with our network management system are all stand-alone capital projects allowing us to record the costs of each activity separately from the costs and activities of other smart metering and non-smart metering activities.

Licence update and supports costs for our Oracle database software have been taken from US dollar invoice values, adjusted to Sterling using agreed corporate exchange rates.

IT user gateway software and hardware support and maintenance costs have been taken directly from purchase order values, with the only allocation and apportionment having been the division of the invoice value by 12 (to identify a monthly cost) followed by the splitting these costs equally between our two licences.

RDP costs have been taken directly from purchase order values; hence no estimation, allocation or apportionments have been undertaken save from splitting these costs equally between our two licences.

Commentary regarding DNO's estimates of the benefits of smart metering for domestic and non-domestic customers using the categories set out in DECC's January 2014 Impact Assessment:

Smart Metering Estimated Benefits for the 2019/20 regulatory year are nil.

This is because each of the seven benefit categories set out in DECC's original Impact Assessment require an appropriate volume of reliable smart metering data to be available to us as an essential input to the delivery of benefits.

The data that is available to us is not yet reliable, nor is it available in sufficient volumes with sufficient geographic coverage to support benefit delivery.

The level of SMETS2 and SMETS1 meters enrolled in Data Communications Company (DCC) systems in our licence areas up to the end of the 2019/20 regulatory year account for circa 5% of our domestic and small non-domestic customers.

The deployment rate of SMETS2 meters in the DCC's Communication Service Provider North (CSP N) area, which is where our customers are located, has been materially lower than that in the DCC's Communication Service Provider Central & Southern (CSP C&S) area due to a number of technical issues experienced by the DCC in the CSP N area.

When meters are potentially contactable by us, devices from different manufacturers sometimes behave differently to one another; furthermore communications with these meters can be intermittent.

Where SMETS2 meters are installed at customers' premises and we can contact them (we are deploying an upgrade to our system to allow us to contact SMETS1 meters in July/August 2020), the data available from these meters is not yet sufficiently robust for us to be able to rely upon it. In particular, Power Outage Alerts and Power Restoration Alerts are erratic and voltage data is not recorded in meters consistently.

Also, we do not yet have access to half-hourly consumption data, upon which some of the seven benefits categories depend. In order to be able to access such data we need our Data Privacy Plan to be accepted by Ofgem. We submitted our

initial Data Privacy Plan on 12 December 2018 and on 30 May 2019 we submitted a revised Data Privacy Plan, which had been updated to take account of feedback received. We have received feedback on this second version of our plan and are working to revise it accordingly.

Actions to deliver benefits

Detail what activities have been undertaken in the relevant regulatory year to produce benefits of smart metering where efficient and maximise benefits overall to consumers. At a minimum this should include:

- A description of what the expenditure reported under Smart Meter Information Technology Costs is being used to procure and how it expects this to deliver benefits for consumers.
- A description of the benefits expected from the non-elective data procured as part of the Smart Meter Communication Licensee Costs. The DNO should set out how it has used this data.
- A description of the Elective Communication Services being procured, how it has used these services, and a description of the benefits the DNO expects to achieve.

The expenditure reported under Smart Meter Information Technology Costs has been used to support, maintain and upgrade our IT user gateway; to provide our RDP service; and support the integration of our smart metering IT user gateway with our customer relationship management system and distribution network management system.

- The expenditure on our IT user gateway allows us to receive smart meter alerts, execute service requests to send commands to smart meters, and execute service requests to send commands to the DCC. The IT user gateway system is as an essential enabler for the delivery of smart meter benefits.
- The expenditure on our RDP service supports the wider smart metering programme's security model by providing details to the DCC of each of our customer's registered suppliers.
- The expenditure being used to fund the integration of our smart metering IT user gateway with our customer relationship management system will provide our Contact Centre agents, whilst speaking on the telephone to our customers, with visibility of any smart metering outage alerts relating to the customer's premises and to check the supply status of a smart meter at those premises.
- The expenditure being used to fund the integration of our smart metering IT user gateway with our distribution network management system will provide our despatch staff with the ability to check the supply status of smart meters at premises potentially affected by power cuts. This will help them to gain insights into customers without power, customers whose power has been restored, and the potential extent of incidents on non-telemetered parts of our HV network.

No Elective Communication Services have been procured from the DCC.

No Smart Meter Communication Licensee services that are outside of the price control have been procured from the DCC.

Calculation of benefits

Explain how the benefits have been calculated, including all assumptions used and details of the counterfactual scenario against which the benefits are calculated.

Smart Metering Estimated Benefits for the 2019/20 regulatory year are nil.

This is because the RIGs require us to estimate the “gross financial benefits delivered in the Regulatory Year from the use of smart metering data” against each of the seven benefit categories set out in DECC’s January 2014 Impact Assessment.

The relatively low level of smart meters enrolled in DCC systems that are in our licence areas and the inconsistency of data available from these meters means that reliable smart metering data, as an essential input to the delivery of benefits, is not yet available.

Furthermore we do not yet have access to half-hourly consumption data; albeit we have received feedback on the second version of our plan and are revising it accordingly

As such no meaningful smart metering data, from which benefits could realistically be derived, has been available to us in 2019/20.

Use of the RIIO-ED1 CBA Tool

DNOs should use the latest version of the RIIO-ED1 CBA Tool for each solution reported in the worksheet in the Regulatory Year under report. Where the RIIO-ED1 CBA Tool cannot be used to justify a solution, DNOs should explain why and provide evidence for how they have derived the equivalent figures for the worksheet. The most up-to-date CBA for each activity reported in the Regulatory Year under report which are used to complete the worksheet must be submitted.

N/A

Cost benefit analysis additional information

Please include a reference to the file name and location of any additional relevant evidence submitted to support the costs and benefits inputted into this worksheet. This should include the most recent CBA for each solution reported in the Regulatory Year under report.

N/A

E6 – Innovative Solutions

Allocation and estimation methodologies: detail any estimations, allocations or apportionments to calculate the numbers submitted.

The Regulatory Instructions and Guidance published by Ofgem in April 2016 planned for a working group to be established to clarify instructions and guidance on:

- the definition of a unit for different solutions
- consistency in reporting of Innovative Solutions definitions
- consistency in reporting methods with regards to impacts.

Since the working group has not yet been formed, we have followed the guidance in the RIGs, responded to informal feedback from Ofgem and made assumptions that are explained in the commentary below.

In previous years, we have reported on five areas which we have now ceased to

report on:

- Load capacity release
- Generation capacity release
- Telematics in operational vehicles
- Fire retardant workwear
- Farm safety

We believe these are innovative and are continuing to provide benefit. However, we understand that Ofgem have ruled that they do not meet the specific definition of “Innovative Solutions” employed for the purposes of regulatory reporting.

If Ofgem revise this guidance we will provide benefits for these lines. We have not removed the 2015/16 and 2016/17 benefits for these lines as these have been accepted previously.

General

For each of the solutions please explain:

- In detail what the solution is, linking to external documents where necessary.
- How this is being used, and how it is delivering benefits.
- What the volume unit is and what you have counted as a single unit.
- How each of the impacts have been calculated, including what assumptions have been relied upon.

Increase Network Capacity/Optimise Utilisation

Voltage Reduction – We have continued to receive complaints of high voltage on our network as the amount of embedded generation increases. Our programme of reducing the set point voltage at 11kV busbars of our primary substations is benefitting this situation. This is the first step in a revision to our voltage control policy which is being amended as a result of the learning from the CLNR project. The basic assessment involved determining whether the tapping range at the substation is adequate for the expected load flows and voltages on the network, whilst still leaving room for an OC6 voltage reduction. The assessment assumed that the reduction in statutory voltage limit on the LV network (from 225.6V to 216.2V) would provide the necessary voltage leg-room to lower the target voltage at the primary substation by 200V. Reducing the target 11kV voltage by 200V results in a voltage reduction of approximately 4.5V at the LV terminals of a distribution transformer. These actions are designed to create the voltage headroom to cater for the connection of PV without creating voltage complaints.

During the production of the 2019/20 update we noticed that in Yorkshire specific actions to reduce voltage had been recorded, but that opportunities to combine voltage reduction with normal maintenance had also been taken and these had not been recorded. We introduced a new method to capture these by looking at the voltages from our telemetry and we have identified to the end of 2019/20 a further 243 primary substations to be recorded as completed for voltage reduction. It is estimated that these actions release sufficient voltage headroom to connect a further 2,187MVA of distributed generation such as domestic solar PV to the LV network fed from each primary substation, bringing the total to over 4.2GW released. We have recorded this as a correction in 2019/20 only as this is the most conservative recording of the action and benefits. We have not undertaken the work to see if every year could be corrected individually. This

would be possible in Yorkshire, though attempting as similar in the Northeast would not be possible due to a change of desktop telemetry systems over recent years.

HV automation - HV automation - We are currently rolling out Automatic Power Restoration System (APRS) across our High Voltage distribution network. This has been deployed across 64 primary substations in 2019/20; 13 in the Northeast (running total 119) & 51 in Yorkshire (running total 119). It is designed to identify and isolate faulted sections of the network and then restore healthy sections of network within 3 minutes. This restores supplies to many customers automatically and also enables fault restoration/repair staff to be directed towards the faulted section of network more quickly, both of which enhance the customer experience.

LV Technology Programme - We have continued with our pro-active approach to LV network intermittent faults by use of new technology, this centres on the concurrent deployment of 1,081 (1,011 deployed during ED1) smart LV devices on the LV network. The intention is to restore intermittent (Non Damage) faults within 3 minutes and thus enhance customer experience. Over time, this allows the pro-active location and repair of persistently active intermittent faults before customers experience a longer, permanent unplanned interruption (Damage Fault). These devices improve customer service and reduce costs associated with service failures as well as reducing overtime payments due to the ability to programme fuse replacements in normal working time.

Improve asset life cycle management

HV circuit breaker retrofit - Retrofitting refers to the replacement of the moving portion and its carriage with a modern equivalent. The fault current interruption medium used in recovered units is likely to be oil; the replacement units will typically employ a vacuum to extinguish the arc.

Retrofitting extends the asset life significantly and provides network performance benefits with reduced capital investment compared to replacement.

The replacement of a complete switchboard would normally require an off-line build, involving the construction of a new switchroom adjacent to the existing building. This option presents significant building, civil and cabling costs and adjacent land may not be available. Retrofitting mitigates the most significant risks associated with the existing switchboard, but retains the fixed portion and associated cabling, auxiliary wiring and instruments, thus incurring significantly lower capital investment.

In 2019/20 we retrofitted 63 units, 47 in Yorkshire and 16 in the North East.

Transformer insulating oil regeneration - Acidity and moisture are products of the degradation of the insulation systems and their presence will accelerate the further deterioration of the paper insulation. Treatment of the insulating oil to remove acidity and moisture will extend the transformer life significantly.

On-line regeneration of the oil has significant benefits over an oil change including:

- More effective removal of particles and sludge;
- Longer term improvement of the insulating oil;
- Negates the need to drain the transformer;

- Negates the need to pull a vacuum on the transformer;
- Significantly reduces the quantity of insulating oil that needs to be transported to site and reduces the associated safety risk and cost; and
- Overall reduction of Northern Powergrid's carbon footprint.

Life extension of the transformer will only be realised if all the components of the unit remain serviceable. Oil regeneration shall only be undertaken following an assessment of tap changer serviceability and main tank integrity, and subject to satisfactory oil dissolved gas analysis results. The programme is on track to refurbish the 47 transformers identified in the 2015 Asset Serviceability Review (which will include oil regeneration in the majority of cases) during RIIO ED1.

In 2019/20 we regenerated 10 units, 8 in Yorkshire and 2 in the North East.

Improve Environmental Impact

Fluid filled cable leak location (PFT) - We deployed PFT leak detection techniques to successfully locate and repair four EHV fluid filled cable circuits in 2019/20 (all in Yorkshire). The time saved to locate these leaks, compared with traditional dig and freeze technique, saved approximately 2,400 litres of cable fluid that would otherwise have been lost into the ground. Location using PFT is quite an expensive technique and, whilst it does not actually deliver any significant cost savings relative to the traditional technique, it does reduce the number of excavations required and so reduces the impact of the leak location and repair activity on the local environment in terms of street-works disruption. The increased speed of leak location and reduced fluid loss also enables us to restore full network security more quickly and reduces the risk of prosecution under environmental legislation. We currently have a prioritised programme for a fluid exchange programme to add PFT to all leaking 132kV and EHV fluid filled cables so that as soon as the leak rate reaches threshold values we are able to achieve a very rapid location and repair due to the fact that the cable already contains the PFT and the location only needs a leak location survey.

Use of the RIIO-ED1 CBA Tool

DNOs should use the latest version of the RIIO-ED1 CBA Tool for each solution reported in the Regulatory Year under report. Where the RIIO-ED1 CBA Tool cannot be used to justify a solution, DNOs should explain why and provide evidence for how they have derived the equivalent figures for the worksheet. The most up-to-date CBA for each solution reported in the Regulatory Year under report which are used to complete the worksheet must be submitted.

It should be noted that none of the initiatives reported in this return were initially justified by using the Ofgem CBA table. The information in our own CBAs has therefore been transcribed into the Ofgem CBA as best as reasonably practicable. Any expenditure incurred in 2016, for benefits realised in 2017 and projected beyond 2017, has been shown as 2017 expenditure. CBAs have been completed in this way for the following items:

- LV technology programme (Bidoyngs)
- HV automation (APRS)
- Cable fluid leak location

We have not completed CBAs for capacity recovery or constrained generation. For capacity recovery, the costs are quite low but the payback can be quite random. For constrained generation connections, the CBA really lies with the connectee who has to consider the risks of occasional constraints on future cash

flows vs. the reduction in connection costs that can be achieved through these arrangements.

Changes to CBAs

If, following an update to the CBA used to originally justify the activity in column C, the updated CBA shows a negative net benefit for an activity, but the DNO decides it is in the best interests of consumers to continue the activity, the DNO should include an explanation of what has changed and why the DNO is continuing the activity.

N/A

Calculation of benefits

Explain how the benefits have been calculated, including all assumptions used and details of the counterfactual scenario against which the benefits are calculated.

Voltage Reduction – The benefits for generators, as a result of lowering the target 11kV (or 20kV) voltage at the primary substation will vary depending upon the local network topology. Each Primary substation level bar reduction =1 on the table. We have undertaken a desktop study of 166 existing LV feeders to identify the potential increase in generation export capacity if the voltage at the distribution substation was lowered.

Lowering the LV bar at a 11,000/400V distribution substation by 4V (from 252V to 248V) the average export capability per household increases significantly but the starting and revised export capability varies significantly by network, as follows:

	No. of customers on feeder	Max kW generation per customer at 252V	Max kW generation per customer at 248V	Total kW permitted generation at 252V	Total kW permitted generation at 248V
<i>Average</i>	46	0.88	4.40	26.00	129.80
<i>Max</i>	106	3.18	15.86	59.66	298.30
<i>Min</i>	14	0.07	0.34	6.09	29.58

From the above studies, the average increase in permitted generation export is 3.5kW per customer. However, after accounting for voltage rise in the HV network it would be prudent to reduce the expected increase in capability to, say, 1.5kW per customer.

Northern Powergrid has 654 primary substations and 3.96 million customers. With an average of 6,050 customers per primary substation, the average increase in LV generation capacity is estimated to be 9MW per primary substation.

For the 243 primary substations completed in 2019/20, the expected increase in generation capacity is therefore approximately 2,187MW.

HV automation (APRS) - For CI, the benefits are taken directly from the number of customers whose supplies were restored within three minutes. For CML, the counterfactual is based on long-run historical fault data, which shows that remote switching from the control centre took, on average, five minutes.

	NPVs based on payback periods following one year investment (£m)			
	16 years	24 years	32 years	45 years
<i>HV automation (APRS)</i>	2.18	1.90	1.72	1.54

Transformer insulating oil regeneration – Oil regeneration is expected to increase the residual service life by 10 years if it is undertaken with around 10 years residual service life remaining – i.e. it increases residual service life from 10

years to 20 years.

	NPVs based on payback periods following one year investment (£m)			
	16 years	24 years	32 years	45 years
Oil regeneration	-1.44	-5.15	-10.73	-15.59

LV Technology Programme (Bidoyngs) – Estimate of CI / CML savings on substations where the Bidoyngs have been located and successfully operated on an intermittent fault, calculated from the avoidance of an over 3 minute interruption. An estimate of avoided overtime due to a reduction in fuse replacements during overtime and a reduction in EGS2 payments due to better fault location information reducing restoration times on permanent faults.

	NPVs based on payback periods following one year investment (£m)			
	16 years	24 years	32 years	45 years
LV Technology Programme (Bidoyngs)	2.70	1.64	0.94	0.23

HV circuit breaker retrofit – Retrofitting the moving (active) portion of the circuit breaker significantly reduced the safety risk associated with oil and reduces the network risk presented by deteriorated mechanisms. Civil works and cable jointing are avoided.

Fluid filled cable leak location (PFT) - The oil leakage benefit is calculated from the average leak location timescale being reduced from 28 days to 3 days. This 25 day saving is multiplied by the average leak loss per day to give the fluid loss benefit. For the four circuits in 2019/20 the approximate saving in fluid loss due to the PFT method of location was 4 circuits * 30 litres per day * 25 days quicker location = 3,000 litres; 3,000 litres for the four cables in Yorkshire.

	NPVs based on payback periods following one year investment (£m)			
	16 years	24 years	32 years	45 years
Fluid filled leak location	0.05	0.05	0.05	0.05

Cost benefit analysis additional information

Please include a reference to the file name and location of any additional relevant evidence submitted to support the costs and benefits inputted into this worksheet. This should include the most recent CBA for each solution reported in the Regulatory Year under report.

There have been no significant changes to the business cases for the work we have been undertaking in these areas and the CBAs are therefore still valid.

A summary of the CBA tables are included in this report.

E7 – LCTs

Allocation and estimation methodologies: detail any estimations, allocations or apportionments to calculate the numbers submitted.

The methodology used to report the data has allowed allocating the LCTs to the relevant Northern Powergrid licence with a good level of accuracy.

Our processes to derive the data reported include some assumptions, which are outlined in the section below.

We have assumed that no heat pumps or DG (G98)³ were connected to the primary network.

LCT – Processes used to report data

(i) Please explain processes used to calculate or estimate the number and size of each type of LCT.

(ii) If any assumptions have been made in calculating or estimating either of these values, these must be noted and explained.

Heat pumps

The source of data for heat pump installation and capacity is Ofgem (e-serve).

By adopting this report, we have made the following adjustments:

- **Commissioned date** corresponds to the connection date of the LCT.
- **Installed capacity** corresponds to the size of the LCT installed. As it is given in kW_{th}, a mean seasonal performance factor (SPF) (in line with table 2.6. of *Non-Domestic and Domestic Renewable Heat Incentive (RHI) monthly deployment data: April 2020, for New&Legacy installations*) is applied to determine the capacity connected in kW. Mean SPF as of April 2020 is as follows:
 - 3.1 for air source heat pumps
 - 3.4 for air source heat pumps
 - 2.5 for non-domestic RHI installations.

Installations for which *Installed capacity* was omitted or zero were excluded.

- Installations for which supply MPAN information was unavailable were cross-referenced with a list of Northern Powergrid's postcode districts. A similar issue pertaining to *Feed In Tariff (FIT)* datasets has been highlighted to Ofgem in 2018 and 2019.

Where a postcode district corresponded to both Northern Powergrid Yorkshire and Northern Powergrid North East, the installations were not included in Table E7 as they represented a negligible variation, as follows:

Installations corresponding to both DNO areas					
	2016	2017	2018	2019	2020
Volume	19	16	20	17	2
Capacity, MW	0.20	0.13	0.08	0.10	0.01

³ G98 has now replaced the G83 standard. The Table E7 still refers to G83.

If these installations were distributed 50:50 between licence areas, they represent an increase of:

	Northeast					Yorkshire				
	2016	2017	2018	2019	2020	2016	2017	2018	2019	2020
Volume	2.3%	2.7%	2.9%	1.8%	0.2%	2.2%	1.7%	1.7%	1.6%	0.1%
Capacity	6.0%	3.1%	2.0%	1.4%	0.3%	4.2%	3.3%	1.7%	1.7%	0.2%

We have restated 2015/16, 2016/17, 2017/18, and 2018/19 numbers in order to remain true to the database, taking the same approach as with Feed-In Tariff data.

Changes in estimated volumes of HPs installed (re-stated):

	Northeast				Yorkshire			
<i>Heat pumps</i>	2016	2017	2018	2019	2016	2017	2018	2019
Reported in 2019	425	294	344	331	446	502	605	481
Reported in 2020	416	291	349	467	428	479	578	543
Change, %	-2.1%	-1.0%	1.5%	41.1%	-4.0%	-4.6%	-4.5%	12.9%

Changes in estimated size of HPs installed – MW (re-stated):

	Northeast				Yorkshire			
<i>Heat pumps</i>	2016	2017	2018	2019	2016	2017	2018	2019
Reported in 2019	1.84	2.20	1.26	1.15	2.88	2.16	2.34	2.28
Reported in 2020	1.70	2.16	2.03	3.77	2.43	2.02	2.39	3.14
Change, %	-7.3%	-1.6%	61.2%	227.2%	-15.6%	-6.6%	2.2%	38.2%

Electric vehicle chargers

The source for Electric Vehicle chargers data is the connection notifications that the installers send to Northern Powergrid. No assumptions or estimations were made on this data.

DG (G98):

DG (G98) data for 2019-20 has been sourced from the connection notifications that the installers send to Northern Powergrid. No assumptions or estimations were made on this data.

DG (G98) data for up to 2018-19 has been sourced from Ofgem (e-serve). Customers who install small renewable generation have been incentivised to declare it to Ofgem through the Feed-In-Tariff (FiT) scheme. This has resulted in a higher level of accuracy for this data source compared to that held by Northern Powergrid. We have made the following low-risk assumptions whilst using the data source:

- **Commissioned date** corresponds to the connection date of the LCT. Installations with no information to estimate connection date (blank cells in column *Commissioned date*) comprised the majority of entries in the public Feed-In Tariff installation report (published on 7 April 2020, data

accurate as of 31 March 2020). We therefore used the report published on 9 January 2020⁴ assuming a negligible volume of applications received during Q1 2020.

- **Declared capacity** corresponds to the size of the LCT installed, we use it to filter the G98 from non-G98. We have assumed that installations with capacity smaller and up to 4kW can be classified as G98 (previously G83) generation, irrespectively of their FiT tag.

We have restated 2015/16, 2016/17, 2017/18, and 2018/19 numbers in order to remain true to the database, which is updated every quarter, and after consultation with the team in Ofgem (e-serve) responsible for the report. This has resulted in small changes of capacity and volumes and we attribute it to the public FiT report now containing more accurate supply MPAN information.

Last year, installations for which supply MPAN information was unavailable (blank cells in column *Supply MPAN No*) were cross-referenced with a list of Northern Powergrid's postcode districts. This issue arises for installations which do not have a supply meter, and the Feed-In-Tariff report does not include export meter data. The issue has been highlighted to Ofgem in 2018 and 2019. This year, we only found one such entry, corresponding to the Yorkshire licence area.

Changes in estimated volumes of PVs installed (re-stated):

	Northeast				Yorkshire			
<i>PV</i>	2016	2017	2018	2019	2016	2017	2018	2019
Reported in 2019	11,962	1,295	914	767	13,083	2,299	1,131	846
Reported in 2020	11,890	1,304	932	1,231	13,038	2,320	1,155	1,333
Change, %	-0.6%	0.7%	2.0%	60.5%	-0.3%	0.9%	2.1%	57.6%

Changes in estimated size of PVs installed – MW (re-stated):

	Northeast				Yorkshire			
<i>PV</i>	2016	2017	2018	2019	2016	2017	2018	2019
Reported in 2019	35.36	3.88	2.92	2.49	40.27	7.18	3.61	2.82
Reported in 2020	35.24	3.90	2.97	3.98	40.17	7.24	3.69	4.40
Change, %	-0.3%	0.7%	1.8%	59.8%	-0.3%	0.9%	2.1%	55.9%

Other DG (G98) installations reported include battery storage, micro CHP (domestic), and wind generation.

DG (non G98)

The source for DG (non G98) data is the connection request database held in Northern Powergrid.

CHP installations where fuel had not been determined have been included in the report (none in 2019/20). Fossil-fuel powered CHP installations were excluded, as follows:

⁴ Available from: [ofgem.gov.uk/publications-and-updates/feed-tariff-installation-report-31-december-2019](https://www.ofgem.gov.uk/publications-and-updates/feed-tariff-installation-report-31-december-2019)

CHP	Northeast	Yorkshire	
Volume	3	2	
Capacity, MW	12.228	2.083	

LCT – Uptake

Please explain how the level of LCT uptake experienced compares to the forecast in your RIIO-ED1 Business Plan and the DECC low carbon scenarios. This must also include any expectation of changes in the trajectory for each LCT over the next Regulatory Year in comparison to actuals to date.

Our forecast of LCT uptake in our licence areas, over the RIIO-ED1 period was quantified in our submission back to Ofgem of Table CV103 in 2014.

The rate of LCT uptake is highly sensitive to the Government's stimuli and also depends on the market's ability to find profitable business models. During the regulatory year 2015-16, a reduction took place on FiT and RHI, and Renewable Obligation (RO) closed for new onshore wind operators. In 2017, the Government announced its plans to ban new petrol and diesel car sales from 2040. As a result, the uptake of LCTs has been slow, although the uptake of electric vehicle chargers slightly increased in 2017/18.

In 2018/19, LCT uptake was still falling, with the exception of EV chargers in Yorkshire. In the North East, the number of new slow and fast EV chargers fell, however, the capacity of the fast chargers increased. In 2019, the Government closed the FiT scheme and decided to introduce the Smart Export Guarantee from 1 January 2020.

Closure of the FiT scheme has resulted in a decrease in smallscale PV installations in the short term, as markets identify new business models. We expect to see a slight increase in the number of heat pumps connected, as the Government has revised its building standards for new buildings which support the uptake of low-carbon heating in the form of heat pumps; however we don't expect significant increase unless policy for building standards in existing buildings would change to strongly support the uptake of heat pumps.

Heat pumps

Our LCT growth projection for the 2015-23 period was based on a Low HP forecast scenario. In Yorkshire and the Northeast, the actuals are well below forecast (both in terms of number of installations and input electrical capacity).

Electric vehicle chargers

Our LCT growth projection was again based on Low EV forecast scenario. Although there has been an increase in chargers since 2017, the comparison between actuals versus forecast shows that EV chargers are behind forecast. In terms of connected capacity, it was below forecast for slow chargers but exceeded the forecast for fast chargers in both licence areas.

Photovoltaic (G98 and non-G98)

Our LCT growth projection was based on the low DECC forecast for HV and EHV, and the medium DECC forecast for LV. In Yorkshire and the Northeast, the actuals are well below forecast in terms of volumes, however the input electrical capacity actuals for 2019/20 marginally exceeded the forecast in Yorkshire and reached 74% of the North East forecast (mostly due to non-G98 installations), i.e. reached 90% of the forecast volumes for capacity connected in 2019/20.