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Energy Networks Association  
Open Networks Project

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**16 June 2020**

Dear ENA Open Networks project

**Citizens Advice response to consultation on the ENA Queue Management Process Guide**

Citizens Advice welcomes the opportunity to respond to this consultation as part of its statutory role to represent domestic and small business energy consumers in Great Britain. Our response is not confidential and may be freely published.

We have responded to the previous consultation on this topic<sup>1</sup> and we are pleased to see that a draft Process Guide has been produced as the next stage towards implementation. We also welcome the continuing stakeholder engagement for this Guide to ensure that the views of a wide group of relevant stakeholders are appropriately captured.

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<sup>1</sup> Citizens Advice response to the ENA Consultation - Application Interactivity and Connection Queue Management, <https://www.citizensadvice.org.uk/Global/CitizensAdvice/Energy/Energy%20Consultation%20responses/1.%20ENA%20Application.pdf>

**Patron HRH The Princess Royal      Chief Executive Dame Gillian Guy**

Citizens Advice is an operating name of the National Association of Citizens Advice Bureaux

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We note that an effective revised Queue Management Process should lead to consumer benefits through providing increased clarity on the connections' process, and through facilitating flexible assets onto the electricity networks which can assist others in the connections' queue by alleviating network constraints. Prioritising flexible assets in this way meets one of the actions within the HM Government and Ofgem 2017 publication 'Upgrading our energy systems: Smart Systems and Flexibility Plan'<sup>2</sup> which noted the need to improve connections for storage providers (Action 1.6).

We understand that industry participants may have more input to the detail of the connections queue, milestones, and tolerance procedures, however, we note that:

- It is valuable to recognise that there may be circumstances beyond a customer's control that may lead to delays as stated at Chapter 11: 'Issues out with a customer's control' and it was useful to have the various circumstances explicitly stated in the document.
- An appeals process is a useful part of the Process Guide and it appears suitable to use pre-existing mechanisms to conduct such appeals, including recourse to Connection and Use of System Code (CUSC) and Common Connections Charging Methodologies (CCCM) processes.
- The webinar on 20 May 2020 noted that there will be a requirement for code changes to the CUSC and Distribution Connection and Use of System Agreement (DUCSA) to enact some parts of the Process Guide. We would encourage rapid implementation of these code changes to gain the benefits of the new queue processes as soon as possible.

If you have any questions regarding this response, please do contact me.

Yours faithfully  
Caroline Farquhar  
Senior Policy Researcher

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<sup>2</sup> HM Government/Ofgem, 'Upgrading our energy systems: Smart Systems and Flexibility Plan', July 2017, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633442/upgrading-our-energy-system-july-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633442/upgrading-our-energy-system-july-2017.pdf)