DCP 350 – Creation of Embedded Capacity Registers

Response on behalf of the Solar Trade Association

About us

Since 1978, the Solar Trade Association (STA) has worked to promote the benefits of solar energy and to make its adoption easy and profitable for domestic and commercial users. A not-for-profit association, we are funded entirely by our membership, which includes installers, manufacturers, distributors, large scale developers, investors and law firms.

Our mission is to empower the UK solar transformation. We are paving the way for solar to deliver the maximum possible share of UK energy by 2030 by enabling a bigger and better solar industry. We represent both solar heat and power, and have a proven track record of winning breakthroughs for solar PV, storage and solar thermal.

Respondent details

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Would you like this response to remain confidential?	No

Introduction

We welcome the opportunity to respond to the DCP 350 Working Group consultation on Embedded Capacity Registers (ECRs). The STA is profoundly concerned with the current state of deployment tracking for UK solar. There are significant challenges regarding the accuracy and completeness of existing data sets, to the detriment of policymakers, market-intelligence and overall understanding of the UK energy system. This is of course largely tied to the closure of support mechanisms, specifically the Feed in Tariff (FiT) and Renewable Obligation (RO), resulting in there no longer being any mechanism for comprehensively tracking new deployment. Publicly available databases provide limited coverage of systems below 1 MW, and coverage of larger schemes is inconsistent.

An accurate understanding of Distributed Energy Resources (DERs) is essential and will only become more so as distributed zero carbon generation, including solar PV, is increasingly connected to the grid. An accurate and transparent public database of DERs is essential to:

1. Ensure safe, efficient and cost-effective grid operation and security of supply
2. Enable efficient investment and lower-cost connection of renewable generation technologies
3. Maintain continuity for research and policymaking

STA Recommendations

1. **Include all sites 50KW and above in ECRs**

We recognise that the Distribution Network Operators (DNOs) have made efforts to improve the accessibility and availability of data on distributed assets on their networks. However, the publicly available System Wide Resource Registers (SWRRs) only cover sites of 1MW and above, as is proposed for the ECR. A resource register limited to assets 1MW and above does not capture domestic deployment at all and misses out substantial swathes of commercial and industrial rooftop deployment. It is critical that, following the closure of FiT and RO to new applicants, a reliable database is developed to accurately assess the deployment of commercial and industrial solar PV that fall below the current 1MW threshold. We believe the DNOs are best placed to maintain this register, as the bodies granting connection agreements.

The lack of visibility creates an unnecessary and fully preventable impediment to grid decarbonisation. Going forward, higher volumes of variable zero-carbon generation can and must be integrated into the electricity system, without any sacrifice in terms of safety or reliability of supply. However, doing so will require vastly improved visibility of distributed energy resources across the entirety of the system. Further, the absence of credible data on the growth of the subsidy free solar market severely limits the ability of the industry to accurately forecast future growth across the sector. This can have negative implications on investor confidence, undermining the growth of solar PV, which is essential to meet legally binding net zero targets.

Evidence provided by our members suggests that the most significant impediment to the further deployment of renewables in GB is in fact the lack of affordable distribution grid connections across GB. To be sure, this is largely driven by the lack of physical network infrastructure capacity. However, another important and overlooked driver is the simple fact that DNOs do not appear to have adequate insight into what is connected to their networks and where, leading to needless delays and rejections for prospective zero-carbon electricity generation developments which would in fact have been viable.

This lack of granularity in grid congestion visibility therefore prevents the deployment of unsubsidised renewable generation, both for large rooftop and groundmount schemes, ultimately preventing consumers from benefitting from the positive impact that this generation capacity would have.

2. **Question 4: Do you agree with the data items that the Working Group have decided should be included in an ECR? If not, what items would you remove/add and why?**

We support the recommended standardisation of ECR data fields and definitions as outlined in Attachment 3, particularly the required inclusion of resource type and technology/plant type. While some DNOs have included this information in their SWRRs, not all have. It is essential, not only for transparency but for accurate forecasting of solar deployment, that data on primary resource type and technology are required for inclusion in ECRs.

3. **Question 8: Do you believe that the publication of a national register by a third party in the future would be of most use to all market participants? If so, in what timeframe would you like to see this in place by?**

Yes, we believe publication of a national register would be most useful to market participants. While the ENA currently links to all SWRRs, it is still cumbersome and time consuming to find the relevant documents on the DNO websites, and the formats for these registers are not always consistent. To improve transparency, accessibility and ease of use it would be beneficial to have a national ECR platform that incorporates data from across DNOs and IDNOs.

It is also essential that the data is made available in a format that can be manipulated to allow for further analysis and aid in deployment forecasting. As noted above, due to the current lack of visibility on deployment of UK solar we would recommend the development and publication of a national register as soon as practicable.

4. **Question 9: Do you agree with the proposal to mandate that the ECR is to be updated on a monthly basis on a set date?**

Yes, monthly updates to the register would be ideal and should be feasible as BEIS currently updates several energy statistics tables on a monthly basis. This update frequency would provide valuable current insights on the extent of grid-connected distributed generation and would match with the rapid pace at which solar PV in particular can be developed. At the very least, we would recommend that the ECR should be updated on a quarterly basis.