

19 July 2023

To whom it may concern,

Community Energy Scotland - Consultation response to ESO - Connections Reform

Community Energy Scotland works with communities and our partners to support, promote and represent the community energy sector. We do this by providing technical assistance, knowledge sharing and championing the role of community-led action in the transition to a low-carbon future. Our vision is of communities actively shaping a low-carbon society that values wellbeing for all.

Community Energy Scotland is Scotland's only national charity dedicated to supporting communities across Scotland to develop their own decarbonisation & renewable energy projects. We aim to advance community development and help strengthen environmental protection within Scotland. By providing advice and support we assist in preventing and relieving poverty within Scotland.

Community Energy Scotland welcomes the opportunity to engage on connection reform, and we look forward to engaging further in this process and would welcome the opportunity to participate in further scrutiny, evidence gathering, and consultation exercises.

Our response does not cover all questions posed in the consultation; instead we have focused on the areas most pertinent to the work of Community Energy Scotland.

Yours faithfully,



Zoë Holliday

CEO, Community Energy Scotland

CONSULTATION QUESTIONS & RESPONSES

Chapter 5 – Key Target Model Add-ons

Question 9: Do you agree with our initial recommendation with regard to TMA F (criteria for accelerating 'priority' projects)?

Broadly we support these criteria and the mechanism for projects to be dubbed priority projects, thus accelerating development of renewable generation, which is vital if we are to reach ambitious targets in Scotland.

Specifically, we support the ESO recommendation to not progress TMA F4 for the same reasons given in page 48, and the potential significant bias this would have against community-led and owned generation.

Further, on TMA F3, we support this mechanism but would note that a 'key delivery milestone such as submission of major planning consents (TMA F3)' is changed from submission to validation. Validation rather than submission would prevent a flood of applications from prospective developers which would a) overrun the already strained planning services in Scotland, and b) prevent prospective weak applications intended solely to gain priority status. If TMA F3 is to be an effective tool to accelerate delivery, then it must be robust and not susceptible to gameplaying.

The language used within TMA F3 is slightly unclear and more guidance on what a 'key delivery milestone' is would be welcome when available.

Chapter 8 - Key Customer and Technology Type Adjustments

Question 20: Do you have any views on the appropriate mechanism to incentivise accurate forecasting of requirements and avoid more RDC than is necessary being requested by DNOs?

While we do not have the capacity to formulate any proposal of what the best mechanism is to incentivise accurate forecasting, we do wish to stress that any mechanism put in place must be impact assessed regarding smaller developers, particularly community owned generation. Any mechanism established must not create new disincentives that reduce uptake of smaller scale generation or block smaller scale

generation. This would most heavily impact on community-led projects, which require streamlined processes and are particularly sensitive to increased administrative and financial burden.

We do welcome the opportunities and flexibility that RDC will create for smaller generators, and whilst we understand the need for accurate forecasting to enable this, the need for such forecasting should not be at the detriment of smaller actors and should not prevent them from uptake of increased opportunities to connect.

Question 21: Do you agree with our views on the process under which DNOs apply to the ESO on behalf of relevant small and medium EG which impacts on or uses the transmission system, including that (under TMO4):

- i) DNOs should be able to request RDC via application windows to allow them to continue to make offers to EG inter-window*

We support this proposal as it provides flexibility (against TMO4 without RDC) and we argue offers potential for cost reduction (against the status quo). By giving the DNO options to work between windows this would reduce uncertainty and waiting times for EG. Issues arise, particularly for community-led projects that have less staff resource and tighter financial constraints, with the current need and costs of a statement of works, and the time it takes to secure one.

The Statement of Works system is currently a financial barrier for EG to connect based on the level of transmission works required to connect even 50kW in most of Scotland at present.

For community generators, the opportunity to be a priority project and fill a capacity gap in the queue is greater due to them typically being smaller scale developments and therefore the flexibility offered by TMO4 would be welcome. However, it is possible that some groups may not be able to take up the offer of queue advancement due to the risk associated with accelerating getting planning permission and financial close depending on how close the new offered connection date is. It is our understanding that the proposed TMO4 would not result in those EG being pushed back in the queue if they do not take up an offer of advancement in the queue.

Finally, we would stress that 'large' generators of up to 100MW in Scotland should also be included in the RDC scheme. In the ENA's Distributed Generation Connection Guide, it is clearly shown that in England, a power station is only considered 'large' when it is above 100MW however in the North of Scotland and South of Scotland power stations are considered to be 'large' when they are above 10MW and 30MW respectively. This requires them to have a BEGA or a BELLA in place. There is therefore a risk of delaying future generation in the range of 10-100MW in Scotland (which would be considered small or medium in England) due to this historic distinction. Future community owned/co-owned developments could be larger than 10MW and we stress that these should be considered within the RDC by DNOs. Including EG of up to 100MW (regardless of geographic location) in the RDC forecasts would be proportionate to support EG to be given a connection offer in the reduced timescale that RDC would provide.

ii) *and resulting offers should be for firm access until relevant EG has reached Gate 2 (at which point they can request advancement and an earlier non-firm connection date)?*

We support temporary non-firm offers being made at stage gate 2 to enable EG to connect sooner while waiting for transmission reinforcements to take place and subsequently move to a firm connection.

We have concerns that the queue management system could create a situation where EG that has been offered a temporary non-firm connection (project 1) could be curtailed further if a priority project (project 2) is connected sooner than the works required to give project 1 a firm connection. Additional consideration to this undesirable scenario should be explored to ensure it does not happen.

We believe that there needs to be the option for EG to be able to connect to the distribution network on a permanent non-firm basis regardless of whether it impacts the transmission network.