



Bluestone Energy Limited  
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## GB CONNECTIONS REFORM

### Appendix 7 – Consultations Questions

June 2023

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### Bluestone Energy Ltd Provided Feedback

#### CHAPTER 5 – Key Target Model Add-ons

Q7. Do you agree with our initial recommendation with regard to TMA D (requirements to apply)?

*A7. Your initial recommendation finds us agreed however more light should be shed on the introduction of a duplication check against the provided LOA and other aspects of the application (TMA D4). To our view, in the scenario of multiple affected by the proposed development landowners, the applicant should be obliged to submit separate LOAs along with an Exclusivity Agreement while clarifying each plot to which LOA corresponds via a consistent Development Site Boundary Plan. Also, any proposal for phased connection should be detailed in the application form. TMA D6 currently require more investigation and transparency on its format; the merits of accepting a standard form contract as part of the connection application process to enable TMA D5 need to be communicated to stakeholders through the next stage of Phase 2.*

Q8. Do you agree with our initial recommendation with regard to TMA E (determination of enabling works), including that it is right to wait until the impact of the 5-Point Plan is known before forming a view on whether further changes to TMA E are required?

*A8. We appreciate your intention to assess first the impact of the 5-Point Plan over the coming months before any decision for further actions lined up with the initial TMA E recommendations being taken. The 'batched assessment' approach to facilitate any future, but still short-term network needs, including a rational amount of anticipatory investment as part of a coordinated network design should be fully considered during the tactical initiatives (5-Point Plan) deployment; the implementation of this approach could have a positive effect particularly where a group of similar technologies are planned to be connected into the same wider part of the transmission network governed within compatible connection timescales.*

Q9. Do you agree with our initial recommendation with regard to TMA F (criteria for accelerating 'priority' projects)?

*A9. Although there are still uncertainties on some of the proposed criteria such as TMA F1 which need further elaboration and directions from the Government and Ofgem the entire recommendation process is definitely worth being implemented to accelerate 'priority projects'. Given that some of the suggested criteria have higher magnitude against other on a sort of 'key milestones scale', the introduction of a Matrix Total scoring methodology for each 'priority project' should be considered aiming to a more consistent and fairer assessment procedure. We feel that TMA F4 criterion doesn't compatibly follow the wider approach though and should be dropped out.*

Q10. Do you agree with our initial recommendation with regard to TMA G (queue management)?

*A10. At first we agree with the initial recommendation that PQM is not included within the reformed connection process as a result of the several concerns were highlighted by various stakeholders. The RQM+ approach sounds quite pragmatic and beneficial however the conditions under which this approach would be implemented has to be further clarified under CMP276 and after exhausting different scenarios where development schemes ahead in the queue fail to meet the key milestone dates. The main concern is how the value of any released capacity gap will be successfully filled by the next 'ready to connect' project in the queue when this project's capacity may not match exactly or its technology is different from the ahead project with the terminated contract. Different scenarios should be exhausted and be clearly demonstrated to stakeholders through the next stage of Phase 2. Have you exercised the possibility of using a combination of multiple schemes (below in the queue) which total capacity value will equate with the required released capacity gap value?*

## **CHAPTER 6 – Target Model Options**

Q11. Do you agree these four TMOs present a reasonable range of options to consider for a reformed connections process?

*A10. Yes, the main feeling is that all presented 4no TMOs explore a fairly wide spectrum of the different options reflecting to a reformed connections process.*

Q12. Do you think any of the four TMOs could be materially improved e.g. by adding, removing or changing a specific aspect of the TMO? If so, what and why?

*A12. We'd like to mainly focus on TMO3 and TMO4 where there would be the opportunity of a coordinated network design process including greater developer collaboration within the design process. In both TMOs it is still unclear how large embedded schemes (distribution connected) requiring transmission access will be treated under a fair queue management approach assuming they have already secured planning consents or are 'priority projects' (TMA F) and their BELLA/BEGA/PP app dates fall within the Gate 2 window. Would these embedded schemes be included in the Holistic/Batched assessment and possibly move up in the queue on a 'First Ready, First Served' basis?*

Q13. Are there any important TMOs we have missed?

*A13. To our view not any key TMOs have been missed.*

Q14. Do you think 'Submit Consent' is too early for Gate 2 in TMO2 to TMO4? If so, what milestone should be used instead and why?

*A14. Subject to the size and design complexity of the scheme, it might be more reasonable the requirement for the developer supplying evidence of planning approval at Gate 2 stage being different in terms of timescales. This means a small window within the wider Gate 2 window could be considered for those developments meeting specific project and connection characteristics criteria e.g. scheme > 1GW export and/or import capacity, scheme with firm access complexity etc. Providing evidence that the necessary legal rights for the whole proposed development land (as per the red line boundary Plan submitted in the application process) have been secured could work as a milestone substitute until the*



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*planning consent has been obtained within the specified smaller window period allowed in the wider Gate 2 window.*

## **CHAPTER 7 – Preferred Target Model Option**

Q15. Do you agree that TMO4 should be the preferred TMO?

*A15. At some extent we agree although we are still a bit cautious about the benefits deriving from the introduction of an early application window mandating developers to submit their application within specific period of the year. TMO3 looks more practical on this aspect allowing the developers applying when they want however the various applications could be still undertaken on a batched basis subject to the application technical competency date. An assumed simple scenario; 10no applications were submitted to NGENSO, 6no of them within October and 4no of them within November 2023, at different dates. 4no of the first 6no applications and 2no of the November's bunch applications obtained clock-start date within the last week of November 2023. These 6no schemes will qualify to Gate 2 under a batched basis.*

Q16. Do you agree with our design criteria assessment of the four TMOs? If not, what would you change any why?

*A16. The general picture of the design criteria have been factored into the overall assessment of the four TMOs looks positive and broadly consistent. Just a few comments; the negative scoring highlighted in red could be justified in brief under the matrix. Also, was there any specific group of participants who provided their score against each criterion per TMO? Has each score derived as an average value from the participants individual scoring?*

Q17. What are your views on the stated benefits and key challenges in relation to TMO4?

*A17. The stated benefits in relation to TMO4 find us agreed as they've been thoroughly described and have indicated a number of expected positive outputs. Similar to other developers we are a bit concerned because of; a) the lengthy timescales of the new process materialisation and b) the considerable time would take for the NGENSO and incumbent TO providing a connection offer under TMO4 comparing to the current arrangements. Despite the aforementioned challenges the additional time will be required to be spent for the preparation of a connection offer is expected to be balanced off by the fact that the scheme's connection date will be accelerated under the new batched assessment and co-ordinated network design approach.*



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Q18. Do you think that there is a better TMO than TMO4? Whether that be TMO1 to TMO3, as presented, a materially different option, or a refined version of one of the four TMOs we have presented?

*A18. As per our answer A15 further above, we'd like to raise your further examination on TMO3 strengths and weaknesses in comparison to TMO4 ones. Under the introduction of some variations in TMO4 or refining of the application limitations related with the Stage 1, we strongly believe TMO4 would best enable the development of a coordinated design for local and enabling works while making the interaction between transmission and distribution networks more effective and adaptive to future priorities and challenges.*