



Independent Networks
Association

Email: box.connectionsreform@nationalgrideso.com

28 July 2023

Connections Reform Consultation

I am writing to you on behalf of the Independent Networks Association (The INA), in response to your consultation on connection reform.

The INA represents the UK's Independent Network Operators which play a vital role in connecting and adopting gas, electricity and water/wastewater distribution networks. These networks serve homes, businesses, generation and EV charging facilities. Our members have delivered significant improvements in competition, choice and service for customers in the electricity, and wider utilities markets and, together, own and operate utility infrastructure and networks that provide energy, heat, power, water and wastewater to over 4 million households and thousands of businesses across GB.

Our members, and the developers they work with, already share the frustration about significant delays to connection dates contingent on transmission connections and reinforcement needed to unlock capacity on the distribution grids. We feel the situation can only get worse at distribution level depending on how long it takes to reform and see progress at a transmission level. Closer working between distribution and transmission is crucial and connections should be viewed holistically across these voltage tiers.

We are broadly supportive of the proposals but have some wider issues.

- The complexity of the proposals indicate that reforms will not take place until mid to late 2025. This is too late. More immediate tactical no-regret solutions should also be identified and fast tracked through governance. Any wider reforms requiring industry governance should also be fast tracked with an implementation date in Spring 2024. Urgent resourcing and capability build is critical within the ESO to deliver the reforms and timely no-regret actions.
- The INA believes that some projects are being constrained by monopoly incumbents modelling connections from a worst-case scenario in terms of their energy consumption, even where there is consumption offset through flexibility or storage. We look to the ESO to take a more sophisticated modelling approach across transmission and distribution that reflects the more dynamic grid that is developing,



Independent Networks
Association

- The competitive model has brought many benefits to energy consumers, this should be the default to deliver all types of network investment, including strategic and enabling investment. This model also introduces additional resource, new ideas and innovation into the market.
- The INA supports greater change at the Transmission and Distribution interface. Such as, visibility of the whole queue at Transmission and Distribution levels. This allows developers to better consider locations for their investment. The proposal for reserved developer capacity (RDC) for small and medium Embedded Generation projects, whilst a step forward, does not solve this core issue. Distribution and Transmission connection queues need to be aligned with a Distribution connection also being allocated a slot in the Transmission queue. Wider Code changes will be needed to ensure changes are implemented swiftly and place time bound obligations on parties, as well as removing existing delays with project progression submissions.

Please don't hesitate to contact me if you wish to clarify any points.

Nicola Pitts
Executive Director
Independent Networks Association