

Do you generally agree with our overall initial positions on each of the foundational design options and key variations? Are there any foundational design options or key variations that we should have also considered?

Agree with the overall sentiment from ESO. Whilst the spread of options and key variations considered for the foundational design position was fairly broad and comprehensive, the end result was good. A more radical approach might have been too intensive for both developers and investors to withstand, with the likely implementation taking much longer.

There should however be greater consideration for more a tactical and quicker implementation of these ideas, without creating a two tiered system. Similar to the thresholds we have now between small, medium and large power stations.

We recommend changes are introduced to the technical assumptions made during the power system modelling of these applications, rather than basing everything on a worst case scenario. We understand this is already being covered and discussed in ESO's proposal, but we want to ensure this is applied to all technologies and associated infrastructure costs, which ultimately will allow customers to undertake a better informed and more risk-free decision when progressing or investing into a scheme. This is particularly noticeable with potential upstream constraints in DNO connections.

Do you agree with our initial view that the current issues with the connections process could potentially be addressed on an enduring basis through other, less radical, and lower risk means than the introduction of capacity auctions?

Agree, and some feedback covered in previous response. We are content ESO are not pursuing this course of action. Pathfinders and other industry auction mechanisms have their place but not in the general connections process.

Do you agree with our initial view that the reformed connections process should facilitate and enable efficient connection under either a market-based (i.e. locational signals) or 'centralised' deployment approach (or an approach somewhere between the two), but not mandate which approach to follow?

Having this halfway approach is not a sensible option. The Connections Reform process needs to have a clear agenda and aimed result at the end to help facilitate a simpler way to connect, not an open ended recommendation which provides little further clarity. A centralised system might apprehend the queue processing and any ESO resourcing to help deliver this might be challenging to acquire.

Our recommendation would be for a more strategic approach of capacity allocation to the TOs which is closely coordinated with the new DSOs to improve the T&D interface.

Do you agree with our initial recommendation that TMA A to TMA C should all be progressed, irrespective of the preferred TMO?

Partially agree, since all three points have strong merits and can contribute to a more robust and flexible connections process.

However, there are improved methods of implementation being utilised by DNOs, such as "tipping point" service or "Materiality Headroom" status which could be better implemented.

Do you agree with our initial recommendation on the introduction of a nominal Pre-Application Stage fee, discounted from the application fee for customers which go on to submit an application within a reasonable time period?

A Pre-Application Stage Fee will only create an entry barrier for smaller developers and could result in wasted spend. It would be more appropriate to have reliable pre-app resources to hand to allow a level of self-assessment ahead of any pre-app meetings scheduled, and we would recommend socialising this cost via the application fees for those who progress into firm application stage.

However, this process must be adequately resourced by the ESO and TOs, to allow greater visibility and transparency of network status prior to any formal pre-app engagement. This includes data being managed by the DNOs, and the condition of the network capacity condition in terms of voltage, fault levels and thermal impacts.

Do you agree with the importance of the TMA A 'Key Data'? Please provide suggestions for any other key data that you suggest we consider publishing at Pre-Application Stage.

Agree, this is an important aspect for reducing any speculative applications and to improve the quality of connections applications being submitted. All customers should be incentivised and be capable of self-assessing their opportunities ahead of any pre-app discussions. However, this is subject to the quality and reliability of the information made available.

We recommend in addition to the TEC Register being public, a live application queue pre-signing register should be made visible, which includes all the DNO applications feeding through the same network interface for generation and demand. This will allow customers to review and understand the best connection opportunities in a given vicinity.

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

Agree, we believe these suggestions for revised requirements of making a connection application apply are appropriate and measured. They should both increase the quality and efficiency of the applications made to reduce speculative activity.

Adequate provisions should be provided to allow changes later due to circumstances outside the developer's control, particularly for land-hungry technologies such as solar and other "edge cases".

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?

Agree. TM04 could be potentially be further improved with more windows offered per year. Even so, these will likely become increasingly congested by applications and it does not solve the wider issue at hand.

ESO to better advertise their requirements via the connections process, and could potentially reserve regional capacity on a regular or transparent basis, so that customers know where to better target their connections.

We also believe that incorporating an "ITO" element, (like "IDNO" at Distribution level) into all these TMO's would not interfere with their benefits and would provide additional speed and flexibility for connecting customers

Are there any important TMOs we have missed?

Yes. Increased transparency of a pre-contract queue, the DNO queue and the project progression status would help significantly. Including the management of "Queue Jumping" between transmission and distribution connections (PQM dynamic queue management)

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?

Disagree, compared to "Get Consent", a Submit Consent is a much simpler milestone for customers to achieve.

Correspondingly, TOs should also be governed by similar milestone standards to help align development programmes with the registered customers which in previous cases has arrived far too little and too late. These milestones include, PoC confirmation, Securing of land, Asset Extensions and Design outlines.

Do you agree that TMO4 should be the preferred TMO?

Agree. the TMO4 is the preferred option. This aligns nicely with the FSO programme, however our concern is the implementation of this may take too long to achieve. In addition to the transparency requirement, we recommend ESO accelerate this process.

Do you agree with our views on network competition in the context of connections reform, including that TMO4 is the option which is most aligned with network competition as it includes the most design time at an early stage in the end-to-end process?

Agree. This can allow appointment of competitive solutions during the design phase.

A strong suggestion, during the assessment window an option to use a competitively appointed ITO should be offered to deliver and adopt any connection assets, whether these would originally be privately owned or owned by the host TO.

Do you agree with our current views in respect of the implementation period?

Partially agree. Whilst the TMO4 might take some time to properly coordinate and effectively implement, we still believe this should be fast tracked with an earlier conclusion date earmarked rather than the current September 2025 target, despite this being the more realistically achievable deadline.

This process requires much more attention and greater resourcing in order to facilitate the appropriate actions needed to help alleviate the current backlog and bottleneck of connections in the queue wishing to connect. This in turn should help accelerate the implementation of the 5-point plan.