

28 July 2023

Julian Leslie
Head of Networks
National Grid ESO
179 Great Portland Street
Marylebone
London
W1W 5PL

Dear Julian,

National Grid Electricity System Operator (ESO) Connections Reform Consultation June 2023

I am responding to your consultation on reform to the electricity connections process, dated June 2023. We agree that continued and improved action must be undertaken to address the major problem of grid connection delays, in order to remove this barrier on Great Britain's journey to net zero. Industry, regulators, and government must take this challenge seriously. Positively, it appears that all parties are agreed on that and are actively working together to address it.

We appreciate the work from National Grid ESO throughout Phase 1 and into Phase 2 of its connection reform process. Through the Energy Networks Association (ENA) collaboration and bilateral interaction, Northern Powergrid has been fully involved and supportive of the ESO's 5-Point Plan and is keen to play its part to benefit as many customers as possible as the plan reaches its conclusions this year. Northern Powergrid is also active with the ESO in the ENA's Strategic Connections Group working to improve the distribution connection process in several key areas across the short and longer term.

We acknowledge and broadly support the principles set out in your consultation, and look forward to continuing to input as the policies are developed and implemented:

- We recognise the benefits of the pre-application TMAs suggested and our role required in supporting information provision and data sharing at the pre-application stage.
- The preferred option of TMO4 (gated process with an early window) appears to broadly achieve the required outcomes of minimising lead times, however, to endorse it fully we feel that we would need to better understand the additional time, resources, and cost needed to implement TMO4 over the other options.
- We recognise the required pace of change for the connections reform, however, also recognise the time required for licence and code changes. Thus highlight the requirement for clear transitional arrangements and timelines to ensure a stable transition.
- We would highlight that connecting customers should be held as the key stakeholder in this process and as such the reform should explicitly hold their views central.

We believe there is an area where ESO could challenge itself to go further. In the solutions that we are together implementing to accelerate connections we are introducing flexible connections on an 'interim

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non-firm' basis. This means that we can connect the customer to the distribution system early and offer them variable access to the transmission system until such time as the necessary transmission reinforcement is delivered. We believe there is value in considering circumstances where this variable access could be provided on an enduring basis particularly where the generating unit is able to supply into a suitable market and avoid the need for any system reinforcement. We encourage the ESO to explicitly consider this possibility.

Northern Powergrid will continue to work on connections process adjustments for key customers and technology types. Looking for opportunities to get customers connected through offering non-firm connections and working with the ESO to produce more pathfinder projects.

National Grid's continued work in producing a reform strategy that works in all parties' best interest is appreciated. We look forward to the publication of the final recommendations and implementation plan in November. In the meantime, National Grid can be assured of our continued support for driving forward the necessary solutions in line with our customers' needs.

Yours sincerely,

A handwritten signature in black ink, appearing to read "P. Glendinning". The signature is written in a cursive, flowing style.

Paul Glendinning
Director of Policy & Markets