Response 60 – ETRS Ltd

3. Foundational Design Options	1. 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? 2. 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? 3. 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?	1. I don't think it right that you have discounted variation 5, separation of connection and capacity as this is feature of TMA E. And this happens already, where Users accept offers with restrictions on availability, and at the DNO level where connection or reinforcement at the TO/DNO boundary is separate from wider transmission reinforcement. It is also emerging as a solution for BESS. No 2. Yes 3. Yes
4. Pre-Application Stage	4. Do you agree with our initial recommendation that TMA A to TMA C should all be progressed, irrespective of the preferred TMO? 5. 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? 6. Do you agree with the	4. Yes 5. Yes 6. Yes. As per my comment on 1 above, information needs to be provided both about the viability/timing of connection (eg possibility of extending the substation or a new site nearby) and constraints from the wider reinforcement requirements.

	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.	
5. Key Target Model Add-ons	7. Do you agree with our initial recommendation with regard to TMA D (requirements to apply)? 8. 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? 9. Do you agree with our initial recommendation with regard to TMA F (criteria for accelerating 'priority' projects)? 10. Do you agree with our initial recommendation with regard to TMA G (queue management)?	7. Yes in principle, but the detail will be important. Also for TMA D5 it is not clear what you mean by requiring the User to accept a standard form contract if the TO or SO are able to insert non-standard terms. It would however be very helpful if all TOs adopted common "standard" terms. 8. No, options in this are should be progressed as priority, after all, Connect and Manage unlocked many projects a decade ago 9. Yes 10. It is not clear what your recommendation is. Whilst the current rules means you have to wait for Ofgem's decision on CMP376, further consideration of appropriate forms of QM for each TMO is needed
6. Target Model Options	11. Do you agree these four TMOs present a reasonable range of options to consider for a reformed connections process? 12. 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? 13. Are there any important TMOs we have missed? 14. Do you think 'Submit Consent'	11. Ultimately a centrally planned solution may be required or become a reality as a result of the electricity system becoming more reliant on a centrally set energy strategy. 12. Clarify in TMO2, 3 and 4 that competent applications can be made at any time up until closure of the gate, and that once submitted they will be assessed for competency allowing time for it to be corrected before the gate closes. 13. No 14. No. But also need to allow from projects where planning is not required eg

	is too early for Gate 2 in TMO2 to TMO4? If so, what milestone should be used instead and why?	applying for additional TEC where an existing consent includes the additional capacity or where the development falls within permitted development. Also need to be considered further in connection with demand connections (see q19 below)
7. Recommended TMO	15. Do you agree that TMO4 should be the preferred TMO?	15. Yes
	16. Do you agree with our design criteria assessment of the four TMOs? If not, what would you change any why?	16. Yes
	17. What are your views on the stated benefits and key challenges in relation to TMO4?	17. well summed up
	18. 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?	18. No

8. Key Customer and Technology Type Adjustments	19. Do you agree with our views on DNO Demand in respect of the TMOs 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? 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 that impact on or use 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; and ii) 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)?	19. It is not clear how the EG (or demand) planning permission "gate" works in the context of a DNO application which triggers reinforcement works based on aggregate (or net) capacity requirements. Nor do we understand the Reserved Developer Capacity as discussed in the this part of the consultation. The team may have discussed the specifics with existing DNOs but has it been discussed with existing or prospective IDNOs who may have different perspectives on this? The discussion also implies that the Appendix G process would become compulsory, whereas we understood that some DNOs want to continue SoW/PP processes. It is also unclear how the process recognises differences between projects was BEGAs and those without, or is it intended that BEGAs will be scrapped and all DG follow the Appendix G process, even if licensable? 20. This question is premature, more work is needed on the implications for embedded connection as discussed above. 21. Ditto.

	22. Do you agree that directly connected demand should be included within TMO4 and that the benefits and challenges are broadly similar as for directly connected generation? 23. Do you agree that TMO1 to TMO3 would require a separate offshore process, and that this would result in material disbenefits? 24. Do you agree that TMO4 is the most aligned to the direction of travel for offshore projects? If not, why? 25. Other than the Letter of Authority differences are there any other TMAs which have specific offshore considerations? 26. 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?	22. Yes in principle but again more detail is needed. 23. Yes 24,Yes 25. No 26. More work needed.
9. Supplementary Target Model Add-ons	27. Do you agree with our initial recommendation related to each of the TMAs within this chapter? If so, why? If not, what would you change and why?	27. Probably a general comment but User Commitment and FSL need review, in particular we don't see how in TMA L, there should any requirement to post security until after Gate 2.
10. Detailed Design, Implementation and Transitional Arrangements	28. Do you agree with our current views in respect of the implementation period? 29. Do you agree with our current views in respect of transitional arrangements? What are your views on how and when we should transition to TMO4? 30. What further action could Government and/or Ofgem take to support connections reform and reduce connection	28. Yes 29. Yes 30. Better and faster dispute resolution process when the User has a dispute with SO or TO during the offer process

	timescales, including in areas outside of connections process reform?	