

Workgroup Consultation Response Proforma**CM095: Implementing Connections Reform**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to stcteam@nationalgrideso.com by **5pm on 06 August 2024**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact stcteam@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Jingling Sun	
Company name:	IB VOGT	
Email address:	Jingling.Sun@ibvogt.com	
Phone number:	+447742800984	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration)

For reference the Applicable STC Objectives are:

- efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act*
- development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission*
- facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity*
- protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees*

- e) *promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.*
- f) *facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
- g) *compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.*

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the Original solution better facilitates: Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <input checked="" type="checkbox"/> F <input type="checkbox"/> G
Click or tap here to enter text.		
2	Do you support the proposed implementation approach? (see page 12)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Yes, I support the proposed implementation approach. The clear division between Gate 1 and Gate 2 processes for new applications and significant modifications should streamline the project approval process. The anticipated go-live date of January 1, 2025, seems reasonable, provided the necessary licence changes and methodology approvals are completed on time. I also appreciate the plan to address STCP changes once there is more clarity on the Connections Reform.		
3	Do you have any other comments?	
Click or tap here to enter text.		
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/> No
Click or tap here to enter text.		

Specific Workgroup Consultation questions		
5	Do you agree with the components of the proposed solution? Please provide rationale for your answer and any suggestions for improvement to each component.	
	Component A: Proposed Reformed Connections Process	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

and Timescales, including ESO/TO obligations (see pages 5-6)	
<p>Yes, we agree with the components of the proposed solution. The clear structure of the Gate 1 and Gate 2 processes, including the annual application window and the batched assessment by the ESO and TOs, seems well-organized. The proposed timeline and frequency for applications and offers align well with the need for a coordinated network design. The plan to review and adjust the process based on stakeholder feedback is a positive approach. However, it would be better if there are multiple Gate 1 windows for customers to submit the application.</p>	
Component B: Connections Network Design Methodology (see pages 6, 8-9)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Yes, we agree with Component B of the proposed solution. The outline for the CNDM seems well-structured, and the requirement for the ESO and TOs to have a CNDM, along with the obligations to publish and engage with the industry on it, is sensible. However, I would encourage the Proposer to enhance codifying the capacity reallocation mechanism, as its central role in the process makes it crucial for ensuring clarity and avoiding potential delays.</p>	
Component C: Connection Point and Capacity Reservation (see pages 6-10)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>We see the potential benefits in Component C, particularly regarding the reservation of connection points and capacity to support network competition and offshore coordination. However, we have concerns about how the reservation process will be implemented and managed. Specifically, we would like more clarity on how the reservation periods will be determined and the criteria for releasing unallocated capacity. It is also crucial to ensure that the proposed approach does not inadvertently disadvantage onshore projects or create inefficiencies. Additional details on the governance and transparency of this process would be beneficial.</p>	
6 Do you agree that the Proposer has fully identified the high-level impacts (subject to legal text drafting) on the STC and STCPs as a result of the CMP434 Proposal? If you do not agree, what else do you think is impacted and/or needs to change? (see page 3)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	Yes, we agree that the Proposer has effectively identified the high-level impacts on the STC and STCPs as a result of the CMP434 Proposal.	
7	In your consideration of the CM095 proposal, are there any potential risks for implementation which might also impact the CMP434 or CMP435/CM096 proposals?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>There are potential risks with the CM095 proposal that could impact the CMP434 and CMP435/CM096 proposals, particularly concerning transparency and fairness. CM095's proposal to extend the reservation process might lead to concerns about preferential treatment or inequities between offshore and onshore projects. If these concerns are not addressed, it could affect the fairness of the Gate 2 process outlined in CMP435. Additionally, the complexity of integrating these new reservation and design methodologies could impact the overall transparency and efficiency of the connections reform, potentially leading to stakeholder dissatisfaction or disputes. Furthermore, none of the proposals define in detail how distribution projects can be actively involved in the connection reform. For example, how can distribution projects self-declare that they meet the Gate 2 criteria once the Connection Reform process launches in 2025? This might disadvantage distribution projects, as there is no clear guidance for DNOs to follow in terms of speeding up connections for those projects when they meet the Gate 2 criteria.</p>		