

Workgroup Consultation Responses Summary																							
CMP435: Application of Gate 2 Criteria to existing contracted background																							
Consultation date: 25 July 2024 - 06 August 2024																							
Respondent Details				Standard Consultation Questions				Specific Consultation Questions														Themes	
				Q5 - Do you agree with the elements of the proposed solution for CMP435? Yes/No																			
Response Number	Organisation	Name	Organisation type	Q1 - Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?	Q2 - Do you support the proposed implementation approach?	Q3 - Do you have any other comments?	Q4 - Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Element 1: Proposed Authority approved methodologies and ESO guidance	Element 3: Clarifying which projects go through the Primary Process	Element 5: Clarifying any Primary Process differences for customer groups	Element 8: Longstop Date for Gate 1 Agreements	Element 9: Project Designation	Element 11: Setting out the criteria for demonstrating Gate 2 has been achieved and setting out the obligations imposed once Gate 2 has been achieved	Element 13: Gate 2 Criteria Evidence Assessment	Element 14: Gate 2 Offer and Project Site Location Change	Element 16: Introducing the proposed Connections Network Design Methodology (CNDM)	Element 19: Contractual changes	Element 20: Cut Over arrangements	Q6 - Are there any elements of the proposed CMP435 solution - as per Q5 - which you believe are not appropriate to include when you consider how to most effectively implement TMO4+ to projects in the existing contracted background (as opposed to the process for new applicants via CMP434)? If yes, please provide supporting justification.	Q7 - In relation to Q6, are there any features which you believe are missing in the proposed CMP435 solution that would more effectively facilitate implementation of TMO4+ to the existing contracted background. If yes, please provide details and justification.	Q8 - Do you believe any groups of projects should be exempt from the scope of CMP435 or from some elements of the proposed solution? If so, please advise on which groups and elements and provide rationale to why.	Q9 - Do you believe that the proposed solution could duly or unduly discriminate against any particular types of projects? If so, do you believe this is justified?	Key points
1	Kona Energy Limited	Andy Willis	Generator / Storage	N/A	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	The respondent is not supportive of solution because of delays that will ensue because of Gate 2 still having a vast number of connections which can progress. This will lead to a 'queue within a queue' and will delay implementations further  The respondent suggest that for 'First ready first connect' to work, it will have to go off developer's 'first-choice' substation rather than connection nodes or alternative substations  The respondent is supportive of the project designation idea but believes it should not be used by ESO and TOs to pick technologies felt more consented.  Overall, the respondent believes the suggestion seems to be that the process that is used to pick which applications get a bay in Gate 2 needs to be a fairer system.  The respondent suggest that: All applications since the start of the connections reform process and those agreed by the start of the Gate 1 process should be considered in the 1st Tranche of Gate 1 and Gate 2 offers based on the 'first choice' substation.  The Respondent suggests that if the ESO does not have a clear process for the Network Design then it is likely that Connections Reform will fail, and that the CNDM should be codified and not governed by a guidance document.  The Respondent believes that the Cut Over arrangements disadvantage all new applications.
2	Renewable Connections Developments Ltd	Joe Hulyer	Demand / Generator / Storage	Yes (for B)	Yes	No	No	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No	Overall this Respondent is supportive of the solution. However thinks that there should be more clarity r.e. primary process, taking into consideration how this will interact with the BEGA/BELLA process as using IDNO process could be exploited as a back door  Respondent believes there needs to be robust parameters in place to ensure fairness against speculative applications, r.e. longstop date for Gate 1 agreements  The respondent believes that more details around self certification of gate 2 self certification are required  Respondent does not believe that any project should be exempt from having necessary land requirements to facilitate connection
3	Sembcorp Energy (UK) Limited	Mark Field	Demand / Generator / Supplier	Yes (for A, B and D)	Yes	Yes	No	No	Yes	Yes	Yes	No	Yes	No	Yes	No	Yes	Yes	No	No	No	Yes	Respondent is in favour of the proposed solution as believes the more structured approach will improve efficiency. However, expresses that the application of new ESO powers to be able to prioritise some projects over others may hinder true competition in some cases  Respondent is generally supportive of the solution, subject to the availability and content of all proposed new methodologies and relevant guidance documentation, that the Workgroup has yet to see, together with an appropriate regulatory framework to cover these new proposals.  Respondent believes it is important that the full scope of the proposed new Connection Reform is visible in order to provide a clear and complete view and for parties to be able to make fully informed decisions regarding their projects.  Respondent requests close watch from ESO on successful connection reform mods as they embed. They also request clear and prompt communication as to any issues or unforeseen defects, for refinement purposes.  Respondent is concerned that proposed solution for ICs and OHAs to be provided with a confirmed Connection point and date at Gate 1, subject to meeting the Gate 2 criteria within the longstop period, may cause discrimination as provides these projects with more time to prepare for Gate 2 whilst holding a confirmed position; could result in other projects being further delayed
4	Ethical Power	Paul Munday	Generator	N/A	N/A	N/A	N/A	No	Yes	No	Yes	No	Yes	Yes	No	Yes	Yes	Yes	No	No	No	No	Respondent seems supportive of some elements of the solution  A common theme throughout the respondent's response is that they require more clarity on methodology and guidance (Element 1) and Project Designation (Element 9)  The respondent does not support Element 14 of the proposal. The respondent takes the view that it is not workable and is in contradiction to the principal of the purpose of Gate 2. Suggests a different solution is required, which would involve publishing queue data and POC availability so projects can see likelihood of Gate 2 offer before applying for land rights.  The respondent is not supportive of Element 5 of the proposal - particularly the retention of the Statement of Works, Project Progression and Modification Application processes for Gate 2 notification from DNO to NGESO, as in their view it worsens connection process for Distribution Network Companies, and disadvantages DNO users, whilst Transmission users have option to 'self certify'
5	Eclipse Power Networks Limited	Charles Deacon	Distribution Network	Yes for a) b) c) d)	Yes	Yes	No	Yes and No	No	Yes	Yes	Yes	Yes and No	Yes	Yes	Yes	Yes	Yes and No	No	Yes	No	Yes	Respondent largely in support of the solution - however have concerns about fairness in relation to some elements i.e. Element 3, Element 14, Element 20  Respondent does not disagree with methodologies, however are concerned about the lack of open governance and express the need for more transparency and codification  Respondent is mainly concerned about fairness in relation to element 3 - the respondent believes this could have discriminatory effects on small or medium embedded generators  Respondent raises that the effects of Element 5 on offshore users, such as interconnectors, needs to be better understood  Respondent requests more visibility of the work of the ENA SCG to re-order distribution queues. If distribution queues are not re-ordered in-line with new transmission queue positions, this carries much less value. Whole system queues approach.
6	Enso Energy	Rob Smith	Generator / Storage	Yes for a) and b)	Yes	No	No	No	Yes	N/A	Yes	No	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No	N/a	The respondent largely supports the solution, however finds significant issue with Element 9, Project Designation  The respondent feels it is unclear why Project Designation has been included in the CMP434 modification as it does not meet the MVP criteria and it is not clear how it better facilitates the proposers stated aims of a) quicker connections for projects in better positions to progress to connection, b) coordinated and efficient network design, leading to lower overall costs and c) net zero  The respondent posits that Element 9 has been introduced into the proposal for ESO to future-proof itself against unforeseen systems operation risk.  Respondent expresses real concerns in that the industry is being asked to provide views on something that has no firm detail, no clarity on oversight arrangements and no discernible examples of how, and how often, it might be used.  The Respondent believes in regards to Project Designation that if it is utilised to bring forward projects at the expense of the ability of others to accelerate their connection dates, the ESO will effectively be bestowing a commercial advantage on certain applicants. Suggesting that this may be legitimate, but it will create a perception of opaque decision making. Believes it is contrary to open market approach  Respondent believes Element 9 undermines the rest of proposal

	Centrica	Sam Ralton	Generator / Storage / Supplier / Virtual Lead Party	Yes, a) b) d)	Yes	No	No	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	No	No	Respondent agrees with proposal however believes it is unlikely that the Original Proposal would significantly reduce the size of the queue as only a minority of projects may fail to meet these criteria, and therefore the opportunity to accelerate remaining projects may be limited. Thanks timeline for implementation needs to be more realistic. Responden believes that no group of projects should be exempt from scope of CMP435 as would be contrary to applicable objectives Respondent feels it is uncertain on the impact of Element 19 on shortening queues for Gate 2, however find the reordering process suitable  Respondent needs more clarity on Element 9 before supporting, believes it gives uncertainty to projects due to un-codified methodology - doesnt know if this element is necessary Respondent would like to see obligations for ESO to engage with industry prior to formal external consultations before supporting Element 1	
8	Arise Renewable Energy UK Limited	Daniel Cambridge	Supplier	No	No	Yes	N/A	No	No	N/A	Yes	Yes	No	Yes	No	N/A	No	No	Yes	N/A	Yes	Yes	The Respondent doesn't believe the Original Proposal better facilitates any of the Applicable Objectives. The Respondent doesn't support the implementation approach and believes that the 1st January 2025 date doesn't give developers with existing connection agreements sufficient time to implement the gate 2 criteria. The Respondent believes that projects with existing connection agreements that demonstrate compliance with the milestones included in their bilateral connection agreements schedules should be exempt from the scope of CMP435 The Responde believes that the Original proposal could duly or nduly discriminate against projects with existing connection agreements in compliance with the milestone schedules included in their bilateral connection agreements.
9	Innova Renewables	Joe Colebrook	Generator	Yes a) b) d)	Yes	Yes	No	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	The respondent believes the proposal satisfies Objective A B and D, however regarding Objective C, they express concern that the introduction of Element 9 Project Designation, creates discriminatory terms and therefore may not comply with the Electricity Regulation. Innova recommends the Proposer seeks legal advice to confirm if Project Designation complies with the Electricity Regulation. Respondent has fundamental concerns with bias and discrimination being introduced into the connections process via the Methodologies which will be governed by a different process and importantly with different objectives and believe it could reduce the competition in connections.  Respondent highlights that offshore wind and interconnectors are given an advantage within the connections process. Respondent is concerned that the introduction of Designated Projects and the Capacity Reallocation Mechanism (CRM) will reduce the competitiveness of the connections process. It is difficult to know the impact of these processes on competition because the rules are being defined outside of the CUSC.
10	Getlink	Alice Verney	Interconnector	Yes a) b) d)	Yes	No	No	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	Yes	No	Yes	No	No	Respondent broadly supports the solution and implementation approach. In particular the potential to remove non-progressing projects and advance the connection dates of viable projects within the connection queue  Respondent noted that outlined timelines are ambitious and leave little room for delays within the market consultation and Authority approval processes.  Respondent stated that there is a need to consider how any delays to the implementation date will impact the reform process but also projects currently in the queue or progressing Respondent suggest there needs to be clear guidance and communication throughout the implementation of the Connection Reform  Respondent believes there are certain edge cases which have not been fully considered by the current consultation drafting. Propose that the ESO must introduce flexibility into the implementation Respondent does not foresee any duly or unduly discrimination against any technology type.
11	Aquind Limited	Vladimir Temerko	Interconnector	Yes b) d)	Yes	Yes	N/A	Yes	Yes	No	No	N/A	No	Yes	Yes	N/A	Yes	Yes	No	No	No	No	Respondent broadly supports the solution, as they believe it will satisfy objective B and D, through facilitating effective competition by adopting the "first ready, first connected" principle in turn increasing market liquidity, creating a more coordinated network design which should make the connection process more efficient. Respondent also supports the implementation approach for in scope projects. They do however acknowledge the challenging timescales for implementation and urge the ESO to be forthright in communication of implementation and to not rush solution development .  Respondent has strong reservations regarding Element 11 and believes that any existing project that has applied for the planning consent at the go live date should not be subjected to gate 1 and gate 2 of the Primary Process.
12	ESO	Alice Taylor	System operator	Yes a) b) d)	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	yes	Yes	Yes	Yes	No	No	No	No	Respondent believes the original proposal better facilitates a), b), and d) CUSC objectives and agrees with the implementation approach. Respondent is neutral against objective c)
13	Ørsted	Alex Ikonic	Generator	N/A	No	No	No	No	Yes	No	Yes	No	No	N/A	No	No	Yes	Yes	Yes	Yes	No	Yes	The Respondent strongly supports the concept of CMP435 and believes it is key for Connections Reform to be able to deliver its full impact and help the UK achieve Net Zero targets. Respondent expresses concern to the level of uncertainty and detail given in some elements, and as a result of their belief that this proposal is in rudimentary stages, believe that the implementation date is not workable.  Respondent does not support Element 1 - requests higher level of codification - remains an outstanding risk that the ESO could modify methodologies relatively easily/unilaterally, concerned about investor confidence. On a similar note, the respondent believes Element 9 needs codifying and also justifying, as is too broad in its current form Respondent wishes for further discussions at workgroup regarding primary process (Element 5) , concerned about the disadvantage to embedded projects. Respondent requests significant changes to Element 11 such as a 'buffer period' or waiving obligations on implementation if a project is within 5 years of connection, citing that projects that are already developing will be disadvantaged if they have to apply the new objectives retrospectively. Wish for Gate 2 definition to be codified
14	Drax Group	Paul Youngman	Generator/Storage/s upplier	N/A (No for (a), (b), (d))	No	Yes	No	No	Yes	No	No	Yes	Yes	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes	The respondent is supportive of changing the connection process to meet net zero targets but strongly believes that the original proposal fails to demonstrate how it will better facilitate the applicable objectives.  The Respondent believe the modification proposal lacks sufficient and balanced evidence, has interdependency risks [Mods and license conditions] and potential for legal challenge The respondent does also not support the implementation approach - they acknowledge the approach is clear but is not comprehensive neither does it consider significant risks through a rigorous assessment of the full process.  The respondent suggests that there has been a lack of impact assessment for the proposal [project number and MW quantity] and there is no evidence to demonstrate how each of the proposed elements will impact and interact with existing contracts. Additionally, they believe the proposal does not address the defect itself. The respondent believes the modification is insufficiently developed to assess if the proposed changes to the CUSC would facilitate effective competition [The impact of the CNDM has also not been evaluated], in addition to the impact of differential treatment of parties not being assessed or quantified. The respondent believes its unclear whether the CMP435 proposal is effective as an independent modification or is reliant on the CMP434 proposal as a support mechanism, calling into question whether it is effective and robust in reducing the queue.
15	Island Green Power	Sam Althison	Generator	Yes a)	No	Yes	No	Yes/No	Yes	Yes/No	Yes	No	No	N/A	No	No	No	Yes	No	No	N/A	Yes/No	The Respondent suggested that the Proposal could be adjusted to create an even more efficient discharge of the Licensee's obligations e.g., confirming POC and connection date at Gate. The Respondent believes that the Proposal does not better facilitate effective competition and it might even hinder competition with some clear preferential treatment for some projects and larger developers, with no clear justification. The Respondent suggested that the Proposal could create more work for implementation of the CUSC and the checking of Gate 2 criteria and the methodologies (and their review) will also require further administration of the CUSC arrangements. The Respondent agrees with the Primary Process in its simplest format, but the non-codification of the specific elements of the Proposal does not provide for a better approach than is currently used. The Respondent show concerns with the indicative nature of a Gate 1 offer, and believes it seriously increases the initial risk of a project if the connection point has the potential to change.

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16	Orrön Energy Development Ltd	Axel Wikner	Generator	N/A	No	Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes	No	yes	Yes	Yes	Yes	Yes	No	Yes	<div>Respondent does not have a view on the Original Proposal and doesn't support the implementation approach.</div> <div>Respondents impression is that with CMP434 and 435, connecting more renewable energy projects has been deprioritised for the benefit of reducing the queue. Believes that it is possible to achieve both through making some adjustments</div> <div>Respondent stresses the importance of a sufficient transitional period for developers who have invested in their projects based on accepted grid offers and met development deadlines but may not meet the criteria for Gate 2 by 31 January 2025. Suggested transferring all existing firm grid connections to Gate 2, with a disqualification period of 12-24 months post-reform confirmation, to avoid giving an unfair advantage to those with prior knowledge of the reform process.</div> <div>Respondent discussed the challenges faced by developers due to the lack of precise grid connection locations in their grid offers, which hampers their ability to secure land. Finds that the current reform benefits offshore wind projects over onshore renewable projects</div> <div>Respondent believes there has to be a transition period to ensure a level playing field and to enable maximum possible capacity to connect to the grid.</div> <div>Respondent proposed to raise an Alternate WACM, will include suggested interim milestones to reduce the queue while focusing on renewable energy targets, and alternates to current proposal regarding grid congestion</div>	
17	Enfinity Global	Alex Fornal	Generator	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<div>Respondent does not state their preferred solution or implementation approach.</div> <div>Respondent concerned that ESO is taking powers to decide the connections process without proper consultation.</div> <div>Respondent suggest that with respect to non-BEGA-holding distribution connected projects, there is a critical need to highly codify the behaviour of DNOs to ensure these projects are not treated unfairly or disadvantaged as compared to transmission-connected projects, ensuring there is a high degree of standardisation.</div>
18	Commonwealth Asset Management (CWAM)	Peter Rumbold	Demand	Yes a),b) and d)	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Yes	N/A	N/A	N/A	Yes	N/A	N/A	<div>The Respondent supports the application of the new process to all projects in the existing queue and believes this is critical to ensuring the reform delivers the desired impact.</div> <div>The Respondent broadly supports the implementation approach, but believes that is imperative that the ESO and TOs are resourced adequately for implementation.</div> <div>Respondent believes that a large number of projects will self-declare by the deadline and believes it is critical to assess this projects as swiftly as possible.</div> <div>The respondent suggests that the guidance published will need to be very clear on timings and requirements so that there is zero ambiguity and users are able to understand.</div> <div>The respondent believes that the criteria for Gate 2 should be strengthened ( advised that provided suggestions to Gate 1 on secured land rights) and that the Gate 2 should secure the outline planning permission.</div>
19	Flotation Energy	Calum Watt	Generator	Yes a)	Yes	No	Yes	No	No	No	No	Yes	No	No	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	<div>The respondent believes the Proposal has the potential to meet the objectives, but requires further consultation and publication of the supporting methodologies to be progressed.</div> <div>The Respondent is in general support of the Proposal, however careful consideration is needed for the transitional arrangements for projects that are "in-Flight" with a Modification Application prior to the implementation</div> <div>The Respondent want to raise an Alternative for a Grace Period be introduced for existing consented projects to ModApp ahead of 1st January 2025.</div> <div>The respondent believes existing consented projects should be allowed an opportunity to ModApp ahead of 1st January 2025 to resolve any contractual issues without being progressed to Gate 1 and Gate 2</div> <div>The respondent believes the proposed solution will unduly impact projects which are near to securing route to market which would have otherwise been able to ModApp on typical timescales.</div> <div>The respondent believes a small number of consented projects which are approaching FID who require changes to the contracted position should be exempt from the scope of CMP435</div>
20	UK Power Networks	Ross Thompson	Distribution Network Operator	Yes to all	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No	<div>Respondent believes that the original proposal facilitates all 4 objectives, however raises some concern around Element 19</div> <div>Regarding Element 19, the respondent states that thought needs to be given to the consequential impact of a connection agreement of an embedded generator being converted to a Gate 1 agreement.</div> <div>Respondent believes the proposed solution will impact accepted distribution customer quotes, and believe a strong line of sight between the Authority and Government decisions leading to this solution is important. Believe a clear instruction for all DNOs to comply with the requirements of the solution should be included in the proposed legal text for the CUSC modification of CMP 435 (and 434)</div>
21	FRV Powertek Ltd	Ravinder Shan	Generator /Storage	Yes to all	Yes	No	No	N/A	Yes	N/A	Yes	Yes	Yes	Yes	No	N/A	Yes	Yes	Yes	Yes	No	No	No	<div>The Respondent believes the original proposal better facilitates all the applicable CUSC objectives and agrees with the implementation approach.</div> <div>The Respondent agrees with the approach regarding the Authority approved methodologies and understand the need for flexibility but request that these methodologies are published as soon as possible so that they can be approved in time, as approval is contingent on the implementation of connection reform.</div>
22	EDF Energy	Jonathon Hoggarth	Generator	No	No	N/A	Yes	No	Yes	No	Yes	No	yes	Yes	Yes	No	No	No	No	Yes	Yes	N/A	Yes	<div>Respondent does not support the proposal objectives and does not support the implementation approach</div> <div>Respondent is concerned that the current requirement for a forward-looking planning application will result in unwarranted changes to normal project development even for viable projects.</div> <div>Respondent recommend using the recently implemented Queue Management milestones</div> <div>Respondent states the potential technology change restrictions listed in Element 4 of the consultation are unclear and potentially impede normal project development</div> <div>Respondent does not support the short time between Authority decision and CMP435 implementation. Recommends introducing a 6-month transition period to allow developers to appropriately respond to the final decision and legal changes in the CUSC.</div> <div>Respondent mentions that the preferred solution is for the criteria to be codified to ensure stability and prevent future changes without proper industry input.</div> <div>Respondent warns that restricting users from changing original boundary submissions could lead to unintended consequences, such as the termination or reduction of viable projects. They stress the importance of considering future planned development during the planning phase to avoid negative impacts.</div>
23	MaresConnect Limited	Holly Burke	Interconnector	N/A	No	N/A	Yes	Yes	No	Yes	Yes	Yes	N/A	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	<div>Respondent believes that Interconnectors with existing connection agreements should be excluded from the proposal and would like to raise this as a Workgroup Consultation Alternative Request.</div> <div>Respondent believes that the timeframe for interconnectors with existing connection agreements which are currently being assessed in Ofgem's third Cap &amp; floor window should be extended by an additional 6 months to 31 July 2025. As it would be unfair/ discriminate for the same Gate 2 criteria timetable to apply to these projects, as they have been delayed as a result of Ofgem's process/timing for a final decision and would struggle to achieve the Gate 2 criteria by 31 January 2025. This would allow them sufficient time to meet the criteria and obtain the required land interests, which may be delayed due to protracted commercial discussions and Environmental and Technical studies</div> <div>Respondent would also like to raise this as another Workgroup Consultation Alternative Request.</div> <div>Respondent believes that National Grid is in potentially promoting a development process that results in increased costs to UK consumers, by</div>

																							enforcing interconnector developers to secure land rights early in the development process and by taking away their discretion to decide the most appropriate and cost effective time to do this.
24	Google	Brian Denvir	Demand	No to all	No	No	No	N/A	No	N/A	Yes	Yes	No	N/A	N/A	N/A	N/A	N/A	Yes	Yes	Yes	N/A	Respondent does not believe that the Original proposal facilitates any objectives. Respondent doesn't support the application of the proposed connection process to contracts classified as 'connected,' regardless of whether or not some project stages are yet to be energised. Respondent feels that the objective of the proposal is to ensure that viable projects can connect - connected projects have already demonstrated themselves to be viable. Changing the terms of connection agreements for assets that have already been energised creates uncertainty for investors and would undermine confidence in the connection process
25	Zenobe energy	Duncan Hughes	Storage	Yes to all	Yes	No	No	Yes	N/A	Yes	Yes	Yes	Yes	Yes	Yes	Yes	N/A	N/A	No	No	No	No	The Respondent believes the original proposal better facilitates all the applicable CUSC objectives and agrees with the implementation approach.
26	Enviromena Project Management UK Limited	Mark Harding	Generator	Yes to all	Yes	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	The Respondent belives the Original Proposal better facilitates all Applicable CUSC objectives and supports the implementation approach. The Respondent stated that it is positive to see changes proposed to facilitate earlier connections for projects which have long term land rights and a route to planning in place. Respondent supports the 'first ready first connected' approach. Respondent suggests statutory obligations need to be set out for DNOs to ensure projects are not held back for several months / years before they are submitted to NGESO Respondent suggested that information is needed on how the DNOs will replicate this process Respondent believes information regarding transmission and distribution queues should be made readily available to the industry with full details on each projects including land rights status, planning status and funding status as it will enable developers understanding how they may be promoted up the queue. Respondent believes there is lack of detail on how projects which have land rights, planning and funding in place will be accelerated ahead of those projects which just have land rights and a route to planning in place.  Respondent believes that DNOs should look to replicate the process and be aligned ahead of the go live on 1st January 2024, as is critical to the whole process of accelerating connections as without this a project could find itself promoted up the queue at transmission level but still find itself low down in the queue at distribution level.
27	Statkraft	Barney Cowin	Generator	Yes a), b) and d)	Yes	Yes	No	N/A	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	Yes	Yes	The respondent believes the original proposal meets objectives a) b) and d). However takes issue with the Methodologies as they have not been properly clarified. Would like codification for Project Designation Methodology. Their  Respondents primary concern seems to be timescales not being long enough. The respondent believes timescales laid out in Element 11 are unworkable. The respondent is dissatisfied with the practical repercussions of the majority of this Element. The respondent has concerns regarding duplication checks for Element 13 - points out that a project may have 2 technologies at 1 location Respondent believes there is unjustified discrimination for projects with multiple landowners/land packages are discriminated against through the red line boundary change process
28	Uniper UK Ltd	Paul Jones	Generator	Yes a), b) and d)	Yes	No	No	No	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes	N/A	Yes	No	No	No	The respondent belives the Original Proposal better facilitates CUSC objectives (a,b,d) and supports the implementation approach. Respondent does not fully support the proposed Authority approved methodologies and ESO guidance, but does acknowledge in some instances it could be sensible to have separate guidance/methodologies for a process i.e. Project Designation Methodology. Respondent generally feels some of the proposed areas should sit in the CUSC i.e. Gate 2 Criteria
29	Haldane Energy Limited	Lawson Steele	Demand	Yes a) and b)	Yes	No	No	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	No	No	The respondent belives the Original Proposal better facilitates CUSC objectives (a and b) and supports the implementation approach. Whilst the Respondent broadly agrees with the criteria for demonstrating Gate 2 has been achieved, it is clear that some new technology types will have very different requirements. Therefore there needs to be flexibility and/or discretion as to what is actually required in terms of securing land for novel technologies.
30	Northern Powergrid	Luke Scott	DNO	Yes to all	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No	No	No comments
31	Welsh Power	David Palmer	Generator	Yes to all	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No	No	The Respondent belives the Original Proposal better facilitates all Applicable CUSC objectives and supports the implementation approach. The Respondent believes the Proposal helps with streamlining connection processes, reducing delays and improving overall project timelines.  The Respondent believes the clear timelines and structured processes should help in better planning and execution of projects. The Respondent believes all projects should have the same requirements for each gate, and the process can be deemed "technology neutral"
32	SSE Generation Ltd	Garth Graham	Generator/Storage/supplier	Potential to better facilitate (a),(b) & (d).	No	Yes	No	No	Yes	Yes	No	No	No	Yes	No	No	N/A	N/A	Yes	Yes	Yes	No	The Respondent believes that this has the potential to better facilitate objectives a, b and d. However, since being raised, its no longer clear that prioritising reader projects will deliver the outcomes required nor align with emerging (and consequential for connection reform) UK Government policy developments, including the Clean Power Plan for 2030 and longer-term net zero targets. Respondent supports retrospective application of the modification.  Respondent believes a transition period may be warranted for the implementation of CMP435 (as currently proposed). Because of the proximity between the Authority decision date, festive period and implementation date. This transitional should be greater than two to four weeks, but no longer than twelve weeks. Respondent believes that TMO4+ should ensure that developers are allowed the option to reduce their capacity in line with acreage requirements between Gate 1 and Gate 2 and that CMP435 should be amended accordingly. Respondent believes that stakeholders have not seen the details for 'Derogation 2' and can not therefore comment on the purported transitional arrangements, regarding ModApps for existing projects. The current scope of what ModApps will be allowed (and not allowed) between August 2024 and January 2025 needs to be understood. Respondent believes that Elements 1, 5, 8, 9, 11 and 16, are no longer required, in whole or in part; taking into account both the changing connection reform landscape arising from the UK Government's ongoing policy development and broader concerns with the solution as proposed. Respondent believes that what is being proposed is a broad brushstroke approach applied to all projects regardless of technology type (excluding Respondent believes that whilst CMP435 is not unduly discriminatory, TMO4+ favours technologies or projects that are less complex and/or have a smaller geographical footprint.
33	Nicky Ferguson	Eku Energy Limited	Storage	No to all	No	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes	No	No	No	No	The Respondent does not believe the original proposal better facilitates any of the applicable objectives - although they welcome the decision to implement the requirement to provide Gate 2 Criteria evidence to the existing connection que. The Respondent believes that the Gate 2 planning criteria needs to be more stringent than the original proposal to be adequate and further requirements are needed if the criteria is to have a material impact on queue size and be practical to implement. The Respondent believes that the current process includes too much uncertainty for viable projects which needs to be address for them to remain in the queue and to continue progressing milestones and investment. The Respondent suggests providing more data to customers could help alleviate this uncertainty to aid understanding of their place in the TEC register and possibility of early connection dates i.e. import/export limitations on substations, dates and timeframes for reinforcement, detail of project in queue, status of connections/technology and ESO preference for technology/services and timeframes by location. The Respondent highlighted 3 main issues with the proposal: 1) Process/criteria may increase the cost and decrease the chances of achieving net zero 2)There is a high risk that current proposed gate 2 criteria will be laborious to implement for little impact on the queue. Suggests criteria requires evidence of land ownership, a lease or a fixed option in place for the land for minimum 3 years. 3) The timeframes for impacting the queue are too long and too uncertain, negatively impacting UK investment. Suggests this requires a change to queue management rules as with current requirement will still take 1-3 years to be removed. The Respondent believes ESO could minimise the risks and achieve benefits through their suggestions in Q2.

																							<p>The Respondent does not support the implementation approach as suggests it is insufficient in two areas: 1) the criteria for Gate 2 evidence and 2) the risks/uncertainties that will remain for viable projects that stay in the queue wishing to move forward their connection dates.</p> <p>Overall the Respondent does welcome the motivations for the proposal and the implementation approach and that they agree with several elements including: 1) Gate 2 criteria should be added to the existing queue for all connection agreements 2) Projects that cannot submit gate 2 evidence should have their firm connection offers removed 3) Parties should be required to submit evidence to the ESO as soon as possible</p> <p>The Respondent believes that several topics remain unclear and require consideration and further clarification: When you have an offer with an indicative substation how do you submit planning in proposed timeframes? Who bears the cost if required to submit under an indicative location which could then change?</p> <p>The Respondent is unclear of the process for assets &lt;100MW connected to the DNO network</p> <p>The Respondent suggests it is unclear for existing contracted background how the date of the land agreement [required for self declaration] will affect the queue position</p> <p>The Respondent suggests that the ESO outlines when projects successful in receiving gate 2 connection offers and then apply for a MODAP, would hear about their new connection dates.</p>
34	National Grid Ventures	Andy Dekany	Interconnector	No to all	No	No	Yes	N/A	N/A	No	No	Yes	No	No	No	Yes	No	No	Yes	Yes	No	No	<p>Respondent believes that the Original Proposal has the potential to better facilitate the Applicable CUSC Objectives. However there are reservations about the current position of the modification</p> <p>Respondent feels the approach taken with the proposal tries to treat all technologies the same</p> <p>Respondent suggests that further development of CMP435 should account for the recent commissioning by the Secretary of State advice to the ESO on the pathway towards 2030 ambition</p> <p>Respondent will be raising an Alternate that suggest the proposal should focus on delivering technology specific solutions to the queue management approach rather than a "one size fits all approach".</p> <p>Respondent states that at no stage has any impact assessment been presented about whether any of the elements of the proposal as it currently stand will have the desired impact of addressing that defect.</p> <p>Respondent believes the timelines are too tight, as well as falling over holiday periods, and implementation approach is risky and therefore unsuitable</p>
35	Scottish Power Renewables	Deborah MacPherson	Generator	Yes, a, b & d	No	No	No	No	N/A	No	Yes	Yes	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes	<p>Respondent believes that the Proposal has the potential to better facilitate the Applicable Objectives than the Original Solution</p> <p>Respondent is concerned about the process timeline and the proposed reforms not achieving the desired impact</p> <p>Respondent believes evidence of land documentation should only be uploaded to the ESO portal for projects within the sample range of checks to reduce unnecessary administrative duties for developers.</p> <p>Respondent believes details of non - codified supplementary processes should be published before the consultation ends to address concerns about terms outside the modification scope.</p> <p>Respondent believes that specific project types (eg. OHAs) that bring complexity and slow down the implementation of this modification should be exempt.</p>
36	Transmission Investment	Holly MacDonald	Transmission Owner	No to all	No	Yes	No	No	N/A	Yes	Yes	No	No	No	No	N/A	No	N/A	Yes	No	Yes	No	<p>Respondent does not believe the Original Proposal will better facilitate the Applicable CUSC Objectives</p> <p>Respondent is concerned that the process will extend the process timelines developers waiting longer to receive a connection offer.</p> <p>Believes there is a lack of clarity on the level of detail proposed for the codified high-level principles and methodologies</p> <p>Agrees that the 3 year long-stop dates should start from the point at which a project becomes akin to a Gate 1 contract - concerned about the proposal to apply Gate 2 criteria to existing projects in the queue.</p>
37	Electricity North West Ltd	Steffan Jones	DNO	Yes a),b),d)	Yes	Yes	Yes	No	Yes	Yes	Yes	No	No	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	<p>Generally, the respondent agrees that the original proposal better facilitates with objectives A, B and D. They believe that objective C is neutral however and that this depends on the maintenance of a high Gate 2 level.</p> <p>The Respondent is not currently convinced that the Gate 2 Criteria as proposed are strong enough to secure the desired outcome.</p> <p>Whilst the Respondent supports the proposed implementation approach they await the revised implementation timetable following approval.</p> <p>The Respondent believes that the delay to the Authority Approval Date without a subsequent delay to the implementation date has an impact on the "existing queue" customers, which is more significant for CMP435 than CMP434.</p> <p>The Respondent believes there is not a viable timeline for customers to respond to the confirmed / approved Gate 2 requirements.</p> <p>The Respondent believes the implementation of CMP435 is critical to the success of CMP434 and the application of CMP435 is required to move a significant proportion of the current pipeline to Gate 1. This therefore needs to be correctly structured, correctly implemented and tied to or ahead of CMP434.</p> <p>Suggests something is needed to ensure that only viable schemes do take Gate 2 status and it is not secured by "speculative" schemes that will then hope to sell on that position.</p> <p>The Respondent wishes to raise propose an alternative request for consideration. They propose a strong / significant financial instrument to Gate 2, a non-refundable deposit to ensure schemes that look for Gate 2 are serious and viable.</p>
38	Muir Mhor Offshore Wind Farm	Helen Snodin	Generator	Yes a, c & d	Yes	No	N/A	Yes	Yes	Yes	Yes	Yes	Yes	Yes	N/A	Yes	N/A	N/A	No	Yes	No	N/A	<p>Respondent agrees that the Original Proposal better facilitates objectives A, C &amp; D.</p> <p>Respondent supports the idea of uncodified methodologies to allow them to evolve, would like to see them be transparent however including a consultation and approval process.</p> <p>Respondent has concerns relating to Gate 1 location changes.</p> <p>Respondent believes a first-read-first-served regime should be introduced,</p>
39	Energiekontor UK Ltd	Cameron Gall	Generator	Yes, c & d	No	No	No	No	N/A	N/A	Yes	No	No	No	Yes	No	No	N/A	Yes	Yes	No	Yes	<p>Respondent doesn't think Approved Methodologies as currently envisioned is the best way to process changes to Gate 2 criteria, specifically. Believes there needs to be a process for industry to raise and/or comment on proposed Methodologies.</p> <p>Respondent believes the proposal is missing reference to queue management milestones M1 and M2 in the Gate 2 criteria, as applied specifically to the Gate 2 to Whole Queue process.</p> <p>Respondent feels the principle of "first ready, first connected" should be given more prominence than currently proposed. Carve-outs for specific technologies, such as off-shore wind, should be avoided to allow the most mature projects and technologies to connect.</p>
40	Ocean Winds	Nina Brundage	Generator	Yes, a & b	Yes	Yes	No	No	Yes	Yes	Yes	Yes	No	No	Yes	No	Yes	N/A	No	Yes	Yes	Yes	<p>Respondent agrees that the Original Proposal better facilitates objectives A &amp; B. D is negative because methodology does for implementation will sit outside of the CUSC</p> <p>Implementation approach caveated by saying timescales on the updated Gate 2 offers places significant uncertainty on users</p> <p>Respondent is unclear how ScotWind projects with no post-HND/HNDFUE update offers will be dealt with</p>
41	Energy UK	Tobias Burke	Industry Body	Yes to all	Yes	Yes	No	N/A	N/A	Yes	Yes	Yes	Yes	Yes	No	N/A	N/A	Yes	Yes	Yes	No	Yes	<p>Respondent agrees that the Original Proposal better facilitates all objectives. They believe further steps are required to manage the connection queue beyond 2025 as network moves towards strategic planning.</p> <p>Respondent is supportive of the implementation approach but has notable concerns regarding implementation timescales for those in the queue to be compliant before the land right cut off date and risks legal challenge, possibly requiring Government intervention with a specific programme to avoid this.</p> <p>Respondent acknowledges timelines have been set back by 6 weeks - expresses there needs to be explanation and fair notice on any timeline extensions, smaller firms require notice in advance and time to submit evidence by.</p> <p>The Respondent suggested that the ESO needs to urgently provide clarity on likely go live date and whether this is achievable. If not ESO must provide a contingency plan. Highlights methodologies for Gate 2 criteria and CNDM are not yet produced and urge transparency with the design and degree of codification for these.</p> <p>Respondent raises concerns of timing of the working groups in August as does not give CPAG time to provide views in an area of significant change</p> <p>The Respondent questions in the long run if land rights are sufficient determining factor for queue management - support the supplementary use of some financial commitments such as a CID or Capacity Market contract.</p> <p>The Respondent believes that there is a need for further measures to accelerate connection times after the go live date given the scale of projects willing and able to meet the Gate 2 criteria.</p>

																							Respondent has concerns of over reliance in both CMP434 and CMP435 proposals specifically CNDM, Gate 2 criteria, Significant Modification Application, Project Designation and Capacity Reallocation. Relying on guidance over codification dilutes confidence for investors in UK energy sector.
42	Scottish Renewables	Stephen McKellar	Industry Body	Yes, (a)	No	Yes	No	No	No	No	Neutral	No	No	No	Yes	No	No	Neutral	Neutral	No	Neutral	Neutral	Respondent is concerned amount embedded projects without a BELLA or BEGA needing to liaise with DNO directly. Respondent is concerned about reordering queue. Respondent is concerned proposed timeframe is ambitious. Respondent states there is no apparent active risk management which most connecting projects would use to manage risk during development and delivery.
43	NGED	Sarah Kenny-Levick	DNO	Yes a), b) and d)	No	Yes	No	Yes	Yes	Yes	Yes	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Respondent states that the proposal does drive some improvements to Objectives A, B and D, but feel that that the proposal must go further. Respondent believes that a 'first needed' approach should be integrated into the gate 2 criteria. Propose that further changes are developed in parallel to the TMO4+ proposals. Respondent is concerned about the implementation timescales Do not have sufficient information to determine the impact to processes and customers Respondent suggests 2 months to implement, following the final publication of the legal text to enact TMO4+. Believe adding additional DNO criteria to facilitate acceleration of projects that offer benefit to the distribution network. Respondent would like to see further justification on the proposed self-certification approach. There is concern of false mis-use of this certification and a potential backwards step from a DNO governance perspective. In relation to Queue Management Milestones, the respondent forward-facing milestones will create extra bureaucracy for all parties and will lead to further delays. Milestones should be applied flexibly, based upon the proposed connection dates. Respondent mentioned GC0117 and the impact that this would have on the Connection Reform project and wider processes. Respondent believes an interim version of a system benefit prioritisation should be included, rather than the optimum version where Net Zero plans drive the applications.
44	Ib Vogt	Jingling Sun	Generator	Yes, (b)	Yes	N/A	No	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No	Respondent has some concerns about the implementation approach but believes that the January 31, 2025, deadline for submitting the Gate 2 Self-Declaration Letter is acceptable for the stakeholders. Respondent questioned whether customers will be allowed to give back some capacity for some of their existing projects?
45	Renewable UK	Barnaby Wharton	Industry Body	Yes a), Neutral b) and d)	No	Yes	Yes	No	No	No	Neutral	No	No	No	Yes	No	No	Neutral	Neutral	No	Neutral	N/A	Respondent broadly supports that the proposal has the potential to better facilitate the Applicable Objectives when compared to the present approach. Suggests Objective A has limited evidence to confirm that the proposed changes will achieve the intended objective. It recommends further testing and modeling of various scenarios. Respondent believes Objective B could be better facilitated by the proposal in some cases, it may decrease investor confidence, restrict competition, and impact certain technology types. The current level of definition does not allow for a complete risk assessment. Respondent states that for Objective D, they are relying on guidance and policies that are still to be developed. The achievement of this objective largely depends on information not presented during the consultation. Respondent believes it is important to ensure that all essential documentation, not just methodologies, are made available for industry consultation. Respondent disagrees with the approach and feels the deadlines seem too short, especially during holiday periods and will restrict accessibility of the key information Respondent acknowledges the need for reform but raises concerns about the significant proposed modifications and incomplete processes. There are worries about the restricted accessibility of key information due to a short consultation period, especially over the holiday period, and the potential impact of the timeline on industry response. Respondent questions whether the proposed implementation approach meets objectives and facilitates viable projects and seek a balanced, well-defined change with a robust impact assessment. Views on implementation and post-implementation changes are varied, with concerns about additional requirements impacting investor confidence. Respondent believes there are two user / project groups that need further consideration, either removal from CMP435 or different arrangements such as 2024 Accepted Offers and Large Demand Respondent is overall concerned about timescales / deadlines proposed. Respondent believes it is vital that the principles of the concepts are codified. Respondent is concerned about small and medium embedded users going through the primary process if DFTC is not codified. Respondent feels as though the 3 years is too long for the longstop date.
46	SSEN Distribution	Michelle MacDonald Sandison	Distribution Network	Yes (a), (b) & (d)	No	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes	No	No	Respondent is generally supportive however there are many concerns on timelines being too short within the methodologies ie between Gates 1 & 2 as development life cycle permissions may take longer than expected. Additionally although a site location change might be well intentioned in reality it may be hard to do within the timeline offered. Respondents also suggest the definitions within the methodologies need to be much tighter to give more certainty and recognise that better governance might mean less competition Respondent has suggested that the Guidance and 3 methodologies should be codified as Guidance on its own is legally challenging and not really enforceable in the way a code is and therefore give NESO too much power and could raise risk and cost for participants. The Respondent suggested longstop dates may raise risk and costs as landowners might game with land prices knowing a deadline is drawing in.
47	RWE Renewables & RWE Supply & Trading	Claire Hynes & Tim Ellingham	Generator	Yes, (a) & (d) Negative B	Yes	No	No	No	Yes	Yes	Yes	No	Yes	Yes	No	Yes	Yes	Yes	N/A	N/A	No	Yes	Respondent supports the implementation but has concerns around the timeline for implementing the modification. They believe that the accelerated pace raises the risk that implications/ outcomes may not have been thoroughly considered and could result in unintended consequences. Respondent questioned the practicality of Element 14. Respondent believes that as CMP435 allows for the Designation of certain projects, the proposed solution already allows for exemption. Respondent believes that the process will unduly discriminate against onshore wind or other projects that require longer environmental studies, unless the Proposal is changed to allow different technologies different periods of time to submit for planning.
48	Bute Energy Ltd	Douglas Allan	Generator	Yes (a) & (b)	Yes	Yes	No	Yes	Yes	Yes	No	Yes	No	Yes	No	Yes	Yes	Yes	No	Yes	No	Yes	Respondent is concerned that many aspects of the wider proposals for connections reform have been progressed in ENA meetings and IDNOs were not invited. This has resulted in certain decisions being made (such as excluding embedded demand from scope, what generation is included in the DFTC, and details pertaining to the DFTC) which has limited what can be discussed in CMP435 and created uncertainty about how the proposal would work in practice for IDNOs. Respondent believes that more detailed consideration of the implications on the existing cancellation liability and security requirements arising as a consequence of CMP435 are needed, and that the ESO should be working with affected parties to clarify the arrangements.
49	Green Generation Energy Networks Cymru Ltd	Daryn Lucas	Distribution Network Operator	Yes (a) & (b)	Yes	Yes	No	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No	Respondent requests clarification on those with BELLA / BEGA contracts Respondent has concerns about smaller players facing unintended consequences of not having access to a team of experts and reliance on accurate information from ESO/TO/SNO and Connection Managers.
50	Research Relay Ltd	Dennis Gowland	Generator	Yes, (a), (b) & (c)	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	N/A	N/A	No	No	No	Yes	The respondent criticises the proposal for lacking documentation. They stress the impossibility of making a meaningful assessment without it and express the need for reconsideration when the missing documentation drafts are available. The Respondent outlined the specific missing documentation and caution that any decision made by the regulator could face legal challenges.
51	BayWa r.e. UK	Graham Pannell	Generator	No to all	No	No	No	No	Yes	N/A	No	No	No	No	N/A	No	N/A	Yes	No	Yes	Yes	Yes	The respondent hopes for an update to the original proposal but will support a WACM if necessary. Proposing to adjust the Gate 1 long-stop for pre-existing contracts based on the target grid date. They also support other WACMs, including enhancing duplication checks and limiting early planning milestone dates against target grid dates. The respondent expresses concerns about the potential unfair impact on Embedded Generators with GSP works.

																								The Respondent highlighted the disproportionate burden of securities and capital contributions on a few distribution-connectees. Suggesting that further work is needed to allocate these costs under the Connections Action Plan to prevent undue pressure on these users to terminate their progress.
52	Xlinks Morocco UK Power Project (MUPP)	John Greasley	Generator	Yes, (a), (b) & (d)	Yes	Yes	No	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A	Yes	Respondent considers the proposal neutral to objective C
																								Respondent feels the connections reform should consider offshore 'mega' projects where the majority of assets are outside of the UK and its territorial waters, where there is a risk of not being able to demonstrate (in time) land options are in place to satisfy gate 2 criteria
53	Community Energy Scotland	Eibhlín Norquoy	Generator	Yes, (a) & (d)	No	No	Yes	Yes	No	Yes	No	No	No	Yes	No	Yes	Yes	No	No	No	Yes	Yes	Yes	Respondent is mainly concerned about the timescale.
																								Respondent believes the proposed long stop date of 3 years is not sufficient
54	Field	Andy Ho	Storage	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Respondent has questions around those with BELLA / BEGA contracts
																								Respondent therefore believes there should be more stringent requirements to reach Gate 2 and that having land rights is insufficient a hurdle to help NGEsO and TOs to rationalise the queue.
																								Respondent suggests 1 of 2 additions to Gate 2 criteria: 1 -Planning Consent application submitted (proof of submission) 2 - A minimum financial outlay on planning related activities to date
																								Or alternatively, the Respondent suggests that a 'Ready to Submit Planning Consents Application' or an equivalent criteria be included in gate 2 criteria, but acknowledges this would be fairly difficult in terms of resourcing (checking all planning docs of all projects).
55	SP Energy Networks	Gareth Williams	Distribution Network Operator	Yes, (a), (b) & (d)	No	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No	Yes	Respondent supports the move from a 'First Come, First Served' to a 'First Ready, First Connects' approach.
																								Respondent feels Gate 2 Criteria set out is too low.
																								Respondent would suggest an earlier date than 10 days following the authority decision for cutover arrangements.
56	OnPath Energy Limited- inc Kype Muir Wind Farm	Dan Thomas	Generator	Yes, (a), (b) & (d)	No	Yes	N/A	N/A	No	N/A	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Respondent believes Original Proposal better facilitates the Applicable Objectives for a), b) and d)
																								Respondent does not support the implementation approach. And is concerned about the lack of an impact assessment, short consultation timescales, and the potential for unintended consequences regarding a significant change.
																								Respondent is a member of Renewable UK and support their responses
																								The Respondent highlights the need for further development and testing of interface management requirements with DNOs.
																								Believes this better facilitates Objectives a & b, because it will help facilitate competition by ensuring that projects can only remain in the queue if they make serious and sustained progress towards energisation.
57	Low Carbon	Ed Birkett	Generator	Yes (a) & (b) No (d)	No	Yes	Yes	N/A	Yes	No	Yes	No	Yes	No	No	N/A	No	Yes	No	No	No	Yes	Yes	The Respondent believes it is negative for d, because the ESO is proposing to implement the new rules without changing the connections contracts of developers/Users which has the potential to cause widespread confusion in the industry. Which would have a negative impact on the efficient implementation and administration of the CUSC arrangements.
																								Respondent does not support the implementation approach i.e. ESO's proposal to "deem" that existing contracts have been converted to the Gate 1 Offer. Because this would materially change the meaning of existing contracts without changing the actual legal content of the contract and poses a risk of legal challenge.
																								Respondent believes that the ESO needs to clarify what changes should be allowed to existing agreements as part of the Gate 2 to Whole Queue process (e.g. TEC reduction, removing a technology, reassessment of the most efficient Connection Site).
																								Respondent believes that the ESO needs to clarify what changes should be allowed to existing agreements as part of the Gate 2 to Whole Queue process (e.g. TEC reduction, removing a technology, reassessment of the most efficient Connection Site).
																								Respondent suggests that a Modification Application should be allowed at the point of entry into the Gate 2 to Whole Queue process, in line with the Significant Change and Material Technology Change provisions. As it could lead to inefficient outcomes if developers have to immediately submit Modification Applications following the acceptance of a Gate 2 Offer in Q4 2025.
																								Respondant has submitted one alternative request which: Requires the ESO to amend existing contracts using ATVs, following the same approach as CMP376.
																								But is still deciding on whether to raise the following alternative: Users should be able to seek advancement without paying a fee or submitting a Mod App. If ESO finds/decides that the User is eligible for advancement, only then should the User submit a Mod App and pay a fee.
																								Respondent believes that Elements 9 & 14 should be removed.
																								Respondent believes that the Secretary of State should have the ability to grant projects time-limited exemptions from each of the requirements in both CMP434 and CMP435. This would avoid unintended consequences in relation to strategic projects such as nuclear and gigafactories.
58	National Grid Electricity Transmission	Richard Woodward	Transmission Owner	Yes, (a) & (b)	Yes	Yes	No	No	No	No	Yes	No	Yes	yes	Yes	No	Yes	N/A	Yes	No	No	No	No	The respondent has main concerns relating to the timeline for implementation being extremely compressed
																								Respondent suggests a staggered implementation approach would be more appropriate
																								Respondent feels the wider strategic context is not being considered.
59	Scottish Hydro Electric Transmission plc	Greg Stevenson	Transmission Owner	Yes, (a), (b) & (d)	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	The respondent agrees that the Original Proposal better facilitates the objectives a, b, and d, than the baseline.
																								Respondent believes that the proposed criteria could advantage some types of projects over others and that the proposed approach could enable BESS projects to obtain a queue position sooner than some other project types. The Gate 2 criteria should include a technology aspect to ensure we have a balance of the right technology types connecting to the NETS.
																								Respondent generally supports the proposed implementation approach; however, it is crucial that the detailed design of the process and all ESO Guidance Documents are finalized and published before "going live."
																								The respondent feels that the proposal does not adequately address the current connection challenges. Concerned that, following the proposed Gate 2 criteria, the benefits of reducing the queue may only be temporary and might not meet the Net Zero requirements, necessitating additional changes.
60	Wind2 Limited	Ian Curry	Generator	No to all	Yes	Yes	No	Yes	Yes	Yes	No	Yes	No	No	No	Yes	No	No	No	No	No	Yes	Yes	The respondent has not indicated that any of the objectives better facilitates the applicable objectives, but does support the proposed implementation approach.
																								The respondent recommends that projects which have not met the land option criteria by 31st Jan 2025 are given a six month grace period to secure options.
																								The respondent suggests that the deadline proposed will overwhelm land agents and legal communities, risking delays and potential abandonment of otherwise large scale renewable projects. They suggest a six month grace period will mitigate this risk.
61	Buchan Offshore Wind	Craig Duffy	Generator	Yes, (a) & (b)	Yes	N/A	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No	No	No	The Respondent had no comments.
62	Qualitas Energy	Grant Rogers	Generator	Yes, (b) & (d)	Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Respondent believes that the DNO to TO interface and how this will be managed for the existing queue across and ensuring fair allocation of TEC to connections in the queue is not adequately addressed and should form a fundamental part of the proposal.
																								Respondent fundamentally disagrees with Element 14 and believes it should not be included within the Proposal and has raised an alternative.
																								Responded believes that a clear, and ideally codified, methodology of how existing DNO contracted Customers will be considered within the new Gate 2 queue is needed to avoid discrimination. This will ensure fairness across all DNO's and the ESO in terms of equal treatment of connecting Customers (and/or no detrimental effect to Customers based on application voltage).

																							Respondent believes the proposal risks unduly biasing interconnector and hybrid interconnector applications by issuing a "Gate 2 type" offer at Gate 1 stage and believes this inclusion should be considered for removal where the application is for a generator/generation. All generation Customers should be treated the same regardless of whether directly connected or hybrid interconnector. Doing otherwise will skew favour towards these specific projects which will have greater certainty at an early stage over and above any other applicant.	
63	eSmart Networks Ltd	eSmart Networks Ltd	Other - ICP and Grid Consultancy	Yes, (c) & (d)	N/A	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Yes	N/A	N/A	Limited answers on response
																							Respondent raised concerns around embedded demand being out of scope - feels as though a process is needed to prevent large capacity demand scheme consequences	
																							Respondent feels Gate 2 Criteria is not robust enough	
64	Apatura Energy	James Potter	Generator	Yes to all	Yes	Yes	No	No	Yes	N/A	Yes	No	Yes	Neutral	Yes	No	Yes	Yes	N/A	N/A	N/A	Yes	Respondent believes there is a lack of clarity around the DFTC mechanism and distribution projects	
																							Respondent suggests transparent guidelines for allowable modification application changes should be provided for projects post gate 2	
																							Respondent believes a transparent and auditable methodology should be established to define strategically Important projects in the connection queue.	
																							Respondent advises that multiple projects can be delivered on the same land parcel and parties should communicate with developers to ensure that minimum land area requirements and viability criteria are met for all projects.	
																							Respondent believes that connection offers with unconfirmed nodal substation locations should have the option to relocate the developer's site with a single modification application after gate 2.	
																							Respondent suggests that embedded projects that pass gate 2 should not be disadvantaged by other projects in the same progression or unsigned by the host DNO.	
65	Telis Energy UK	Florent Leblanc	Storage	N/A	N/A	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Respondent does not support the proposal or implementation approach.
																							Believe there are issues related to collocation that make it almost impossible, difficulties in constructing major clean energy generation stations, exclusion of financial instruments, and insufficient consideration of timescales for less mature technologies such as onshore wind, hydrogen, and SMR.	
66	Solar Energy	Kara Davies	Consumer Body	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Respondent faced challenges to consult meaningfully due to tight deadlines and timing of the consultation.
																							Respondent is concerned about the lack of guidance regarding the TMO4+ guidance.	
																							Respondent is concerned regarding changing project sites, DNO/TO interface issues, and NESO designation. Additionally, they urging the networks to consider proposed changes in the context of the government's ambitions, with emphasis on trebling solar capacity and faster delivery.	
																							Respondent is concerned about discussions around implementing technology limits aimed at solar and energy storage, which appear to contradict the principles of connections reform and could undermine the government's priority to decarbonise the power system.	
67	The Crown Estate	Chris Gent	Other	No	Yes	No	No	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Yes	Yes	Respondent supports prioritisation of projects which are consentable, deliverable & economic, and in line with Gov's targets to Net Zero - but highlights concern of tight timescales proposed
																							Respondent states to see response for CMP434 for Element 1, Element 5, Element 8, Element 9, Element 11 and Element 13	
																							Respondent agrees that longstop period is important, suggests that it should be longer, 4 years, for offshore projects	
																							Respondent doesn't agree that one approach to grid connection, for both onshore & offshore energy technologies is appropriate to try to achieve Net Zero	
68	Bluefield Development	Jonathan Selwyn	Other	No	No	No	No	No	No	N/A	No	No	N/A	No	N/A	No	No	No	N/A	N/A	N/A	Yes	Respondent highlights that the proposal does not clarify how it will speed up connections	
																							Respondent highlights that the proposal doesn't explain how the intro of a gated process will contribute to the competition in the generation or the supply of electricity	
																							Respondent highlights that the proposal delivers benefits for customer & consumers, has more capacity for projects that are ready to proceed, and will result in lower over all costs - does not clarify how capacity will be allocated, who will make the decisions and how batching will improve process, more clarity needed here	
																							Respondent does not agree with CMP434 proposals, has not been sufficient consultation with developers & investors, no confidence in the proposed timescales	
																							Respondent states that they do not agree with giving ESO the power to determine which prjects should be prioritised. They highlight concerns that projects / customers will be discriminated against	
69	British Solar Renewables Ltd	Christie Sims	Generator / Storage	Yes to (a), (b) and (d)	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	R feels as though the proposal has been rushed. Believes that the proposal needs significant reassessment of the gate 2 criteria (Element 11). Too easy to pass and there will be no real change to the connection queue, but requiring planning "blind" without a confirmed connection date will make it very difficult for any developer to progress schemes reliably.
																							Land rights on their own are unlikely to noticeably reduce the queue, due to most projects having those available. However any requirement to have committed planning ahead of Gate 2 would be putting planning in blind.	
																							Element 9 could be used as a bias for certain technologies, need more detail of the criteria before commentary can be provided properly. Theoretically nothing wrong with prioritising nation-critical infrastructure, but it's important that these kind of projects have a high barrier to qualify. Land requirements remove some flexibility from hybrid projects which would not be harmful to keep, while it would reduce the scope of projects as they pass through the system. Believes that there is potential for discrimination against solar projects. / Requiring the full land for ALL of the technologies involved, rather than just enough technology of at least one type to reach the TEC, takes away any potential betterment of projects of which several are still likely to be in development for 10 years. This wouldn't reflect a forward thinking approach.	



Respondent Details				Element Summaries											
				Q5 - Do you agree with the elements of the proposed solution for CMP435? Yes/No											
				Element 1: Proposed Authority approved methodologies and ESO guidance	Element 3: Clarifying which projects go through the Primary Process	Element 5: Clarifying any Primary Process differences for customer choice		Element 8: Longstop Date for Gate 1 Agreement	Element 9: Project Designation	Element 11: Setting out the criteria for demonstrating Gate 2 has been achieved and setting out the obligations imposed once Gate 2 has been achieved	Element 13: Gate 2 Criteria Evidence Assessment	Element 14: Gate 2 Offer and Project Site Location Change	Element 15: Introducing the proposed Connections Network Design Methodology (CNDM)	Element 19: Contractual changes	Element 20: Cut Over arrangements
Response Number	Organisation	Name	Organisation type												
1	Kona Energy Limited	Andy Willis	Generator / Storage	N/A	N/A	N/A		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Summaries				No comments to summarise	No comments to summarise	No comments to summarise		No comments to summarise	In principle this seems a sound idea however it should not be used by the ESO and TOs to pick technologies that they feel are more likely to be consented and therefore connected	No comments to summarise	Understands this to mean that the date that land rights were secured will determine the Gate 2 position. This means all developer's land rights dates will be aligned in chronological order and those that meet the Energy Land Density Table will be allocated bays if available. To apply this concept fairly all developers should be considered at their 'first-choice' substation where they may have applied in the first place and not the connection routes or alternative substation that they may have been offered during the connection reform process. Support the ability to request advancement	Element 14 only considers developers moving the development site within a year to one near the new connection point. There seems to be no provision to allocate interested developers to their 'first-choice' substation. The process should be that developers at their 'first choice' substation make their case by providing the evidence of land rights and based on this evidence then spare bays fill up accordingly as Gate 2 offers.	Page 42 of the Consultation indicates that the approach to the CNDM is not clear and there appear to be disagreements. If the ESO does not have a clear process for Network Design then it is likely that Connections Reform will fail. This is critical to get right and the rules of the game and how each TO complies should not be left open to interpretation. The ESO must have a CNDM. Publish the CNDM on a regular basis. Work with Industry on the content of the CNDM. State how the ESO allocates capacity and reallocates capacity and make this a licence condition. Incorporate Spatial Planning / CATO / Commercial Service (Pathfinder) opportunities	Element 19 does not mention location changes which is referred to in Element 14. This should be amended accordingly to allow developers to be considered at Gate 2 for the 'first choice' substation and then be moved if they meet the Gate 2 criteria ahead of others.	Believes the Cut Over arrangements disadvantage all new applications. All applications since the start of the connections reform process and those agreed by the start of the Gate 1 process should be considered in the 1st Tranche of Gate 1 and Gate 2 offers based on the 'first choice' substation. This is the only fair way to allocate bays given that everything has been up in the air for 18 months and uncertainty on location has put off developers applying even though they have been negotiating land agreements and working on planning
2	Renewable Connections Developments Ltd	Joe Hulyer	Demand / Generator / Storage	Positive	Positive	Positive		Positive	Negative	Positive	Positive	Positive	Positive	Positive	Positive
Summaries				No comments to summarise	No comments to summarise	No comments to summarise		Agrees with adding a deadline to gate 1 offer but if the purpose of the reform is to remove connections that are not progressing, allowing a connection to stall the queue for three years is counter intuitive. The Parameters should be put in place to safeguard against speculative applications and capacity banking	As per Element 8 comments	No comments to summarise	No comments to summarise	DNO connection offers should also take this approach.	No comments to summarise	No comments to summarise	No comments to summarise
3	Sembcorp Energy (UK) Limited	Mark Field	Demand / Generator / Supplier	Negative	Positive	Positive		Positive	Negative	Positive	Negative	Positive	Negative	Positive	Positive
Summaries				The respondent believes that further consideration is required in order to strike the correct balance in terms of codification. This it must be understood that the Workgroup has yet to see any details of the proposed new methodologies or how these may be implemented in practice. Further, by expanding ESO licence to cover 'guidance' docs as well as 'methodologies', this would become a matter for 'self-regulation' by ESO. Does not seem to meet usual standards of regulatory rigour - so consideration must be given to the regulatory process and potential impacts to involved parties. Asks ESO to reconsider this aspect of proposal	Noted and supports that the table has been updated and references to new applications in respect of BEGAs/BELLAs have been removed, as we agree that these are specific to CMP434.	Respondent suggests the current proposed solution for ICs and CHNs should be provided with a confirmed Connection point and date (and associated capacity reservation) at Gate 1, subject to meeting the Gate 2 criteria within the longstop period, does introduce an element of discrimination when compared to other projects. As this effectively provides these projects with more time to prepare for Gate 2 whilst holding a confirmed position that could result in other projects being pushed further down the queue. Request close monitoring to ensure it remains fit for purpose and does not allow for competition or market distortions		Respondent believes that the time limit from Gate 1 acceptance to Gate 2 offer acceptance will ensure that viable projects are progressed, whilst clearly identifying those that are not. Asks that this period is regularly reviewed to ensure that it remains appropriate.	Respondent acknowledges that ESO has stated that they envisage that Project Designation is not expected to be frequently used. However, it is difficult to see how many relevant new applications may emerge, particularly as a result of potential new policies that the Government may progress, that could fall within the proposed criteria. This taken together with the ESO's increased powers and intention not to codify this aspect of the connection reform makes this a difficult question to answer. Support the requirement that these projects must conform to the new Primary Process as this will ensure that there remains some form of control	Supports proposal to relax application of Option Agreements subject to evidence that Gate 2 has been met, and that more advanced projects are already meeting/exceeding M1 Milestone are not required to meet minimum option requirements	As the content of the proposed Gate 2 Criteria methodology that will contain the details as to how the criteria will be assessed has not yet been seen, so not able to fully comment on this Element, at this time. Support the proposed criteria for Gate 2 application process - await the drafting of the ESO template that may provide some further insight into the assessment process itself. Supportive of the increased flexibility that comes with allowing advanced projects to request earlier connection dates. Overall, wishes to be informed should this element be progressed.	Respondent believes this is a pragmatic approach to dealing with these situations. Notes that the proposed 12-month period for Developers to address an issue of site relocation may not be always be sufficient. Suggests that the ESO considers the various factors that could result in the need for a site re-location at a later date and ensure that these are clearly communicated in order to inform developers at an earlier stage in the process.	Respondent suggests that as the CNDM is to include the mechanism for how capacity is reallocated, this is an important aspect of the proposed reforms. Advises that the Workgroup has not seen the content of the proposed methodology or has been able to establish a view as to how it would work in practice. Taken together with the fact that the ESO proposes that this will not be codified, we cannot currently support this element.	Respondent believes this is a sensible approach and applies a level of clarity, consistency and pragmatism.	
4	Ethical Power	Paul Munday	Generator	Negative	Positive	Negative		Positive	Negative	Positive	Negative	Positive	Positive	Positive	Positive
Summaries				The respondent comments that many of these documents may only be drafted and not finalised, with only some going through a robust review and approval process. The rest are being issued by the ESO without any consultation. This will be late codification of some elements and mean reliance on guidance or methodologies yet to be written.	No comments to summarise	Retention of the Statement of Works, Project Progression and Modification Application processes for Gate 2 notification from DNO to NGEESO does not improve, and possibly worsens, the connection process for Distribution Network Companies and their customers - DNO users be disadvantaged due to the time taken to go through the Statement of Works process to reach Gate 2 while Transmission customers 'self certify'.		No comments to summarise	Not clear enough - risks undermining reforms until clarified. Does not believe it should be included in code modification	No comments to summarise	Does not view this as workable. Feels different solution is required and expect this will involve NGEESO publishing data about the queue and POC availability as well as hold 'pre Gate 2 application meetings' so that projects can get a view on likely Gate 2 offer before applying or securing land rights.	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise
5	Eclipse Power Networks Limited	Charles Deacon	Distribution Network Operator	Neutral	Negative	Positive		Positive	Positive	Neutral	Positive	Positive	Positive	Positive	Neutral
Summaries				Respondent does not disagree with the methodologies, however they are concerned about lack of open governance, wish for more transparency and codification for developing the methodologies	The respondent views this as discriminatory and is concerned that new GSPs triggered by small or medium embedded generators must obtain the supply point ECA first, before a Project Progression can be submitted leaving an interim period of 3-6 months where their host DNO/DNO will ask them to secure against this new supply point on a Final Sums basis, whilst they don't have a generation contract. Whereas those triggered by BEGAs will have their work 'locked' and then be subject to Gate 1 offer criteria with no securities. Believe Larger embedded demand should be included too.	Respondent believes that impacts on offshore users, such as interconnectors, needs to be better understood.		No comments to summarise	The respondent agrees in principle to investigate this, but this shouldn't mean that such a process should go ahead regardless. Believe this process should be scrutinised via the usual processes and proceed/not proceed on its individual merits.	The respondent agrees in principle with the land elements, however an element of planning progress should be required to enter Gate 2 - which industry would seem to have expected when the reforms were trailed - as this is a firm offer that the TOs will plan around, but which still will carry planning risk. Advises that to reduce Gate 2 attrition, it may be sensible to require more planning progress to request Gate 2 entry in the first place. The allowable change guidance needs to be developed. The date for removal of the minimum option length should be those signed earlier than the decision date, to prevent unnecessarily short options being signed to retain Gate 2 position.	The respondent suggests that 100% of evidence on all applications is checked against publicly available information and the documentation provided, as is done at distribution.	The respondent believes this is sensible, but we will need to consider conflicts with the ENA's Allowable Change guidance for DNO connections which would prohibit this. This would give transmission customers an unfair advantage if not.	The respondent believes that the Capacity Re-allocation Mechanism should allow DNOs to move projects in and out of particular. Project Progression/Gate 2 offers also. Requests more visibility of the work of the ENA SCG to re-order distribution queues. If distribution queues are not re-ordered in-line with new transmission queue positions, this carries much less value. Whole system queue approach. Welcomes this to apply to projects without transmission impacts also.	The respondent would assume that no fee is charged for a transitional offer, or that the total of the transitional and mod app fees is no more than the current full application fee, or this would be unfair. It would be fair if a fee is only levied for advancement should NGEESO believe it would be possible following an expression of interest. To be legally watertight, they suggest all contracts are formally varied if they are moved to gate 1, rather than being 'deemed' to be as such, without a change of terms.	The respondent agrees in principle, however introducing further delay to the connections process should be avoided if possible. This should also be communicated to industry as it is not clear that this has been widely publicised.
6	Enso Energy	Rob Smith	Generator / Storage	Negative	Positive	Neutral		Positive	Negative	Positive	Positive	Negative	Negative	Positive	Positive
Summaries				No comments to summarise	No comments to summarise	No comments to summarise		No comments to summarise	Respondent is strongly against this element. Believes it is unclear why Project Designation has been included in the CMP434 modification as it does not meet the MVP criteria and it is not clear how it better facilitates the proposers stated aims of a) quicker connections for projects in better positions to progress to connection, b) coordinated and efficient network design, leading to lower overall costs and c) net zero. The respondent posits that Element 9 has been introduced into the proposal for ESO to future-proof itself against unforeseen systems operation risk. Respondent has real concerns that industry is being asked to provide views on something that has no firm detail, or clarity on oversight, and no real examples of how, and how often, it might be used. Believes that if it is utilised to bring forward projects at the expense of the ability of others to accelerate their connection dates, the ESO are bestowing a commercial advantage on certain applicants, which will create a perception of opaque decision making. Believes it is contrary to open market approach.	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise
7	Centrica	Sam Railton	Generator / Storage / Supplier / Virtual Lead Party	Negative	Positive	Positive		Positive	Negative	Positive	Positive	Positive	Positive	Positive	Positive
Summaries				As for the response to CMP434, would prefer to see obligations on the ESO to engage with industry prior to formal external consultations, with all relevant documentation being published, in order to support Element 1.	No comments to raise	No comments to raise		Support the introduction of the longstop date, commencing at the point at which a contract becomes a Gate 1 contract. Suggests the ESO should publish for DNOs on application of any extension to the date for relevant embedded projects.	Not enough clarity on how this process would take place, and uncertainty for projects as the methodology is proposed to be non-codified. It is not clear that this element is necessary for application of Gate 2 criteria to the existing queue, as are not aware of any project in the current queue that would clearly meet all the criteria set out in the consultation, and would benefit from an accelerated connection date.	No comments to summarise	Agrees it would be beneficial to provide a standard template for self-assessments, consistent across transmission and distribution. We don't believe gaming risks are significant but recognise sample checking as a proportionate way to manage such risk. Supports in principle, however given size of the queue, ESO may want to consider whether proposed timelines correspond with DNOs capacity to assess the evidence, and what impact may be on their ability to carry out existing responsibilities without undue delay	No comments to summarise	Agrees with this proposal in principle, though cannot comment further until more detail is provided on the form and content for the CNDM.	Agrees with general approach to contractual changes, but it is uncertain how quickly the relevant parties could issue contractual changes - in particular where this is carried out by the DNOs. Significant portion of projects in the current queue are likely to pass Gate 2, and of these we would expect a majority would request an accelerated offer, leading us to question the overall impact on the size of the queue and potential to accelerate projects	Further information is needed on details of the process, and how it may be impacted by a delay to the existing timeline proposed by the ESO.
8	Arise Renewable Energy UK Limited	Daniel Cambridge	Supplier	Negative	Negative	N/A	Yes	Yes	Yes	Negative	Yes	Negative	N/A	Negative	Negative
Summaries				Believes that it should be developed formally with industry and that industry should be able to propose alternatives	Believes Contracted projects will need longer than 1st January 2025 to prepare to meet the Gate 2 requirements.	No comments to summarise		Believes the Proposal looks sensible for new connection offers and is not acceptable for existing connection offers.	No comments to summarise	Disagrees with the density ratios and believes these should not be proscribed by ESO but rather by developers who are developing projects. Suggests that securing 100% of land under option does not reflect the reality for project progression, specially for projects with multiple landowners. Believes that imposing strict deadlines for submission is unfair and does not match the reality for the developers. Believes that the periods proposed are far too short and don't take into account any seasonality of studies or best practice guidelines, but seems to be based on a 'best case, quickest possible time to submission' view. Believes the need to ask for ESO to exercise discretion to maintain grid connection offers doesn't incentivise developers but rather makes developing less attractive and more risky.	Feels appropriate to have Self certification with spot checks	Believes this appears really badly thought through and raises a whole host of issues for developers and creates material risk and uncertainty. Believes the ESO should not have the option to offer a different connection point, rather it should only be where it creates a benefit to projects. Suggests the 12 month period is not sufficient and it should align with the gate 2 window	No comments to summarise	No comments to summarise	No comments to summarise
9	Innova Renewables	Joe Colebrook	Generator	Negative	Positive	Positive		Positive	Negative	Positive	Positive	Positive	Positive	Positive	Positive

Summaries				Significant concerns i.e. lack of clear rules for CRM and its potential discriminatory effects on projects in existing connection queue. Needs detailed and transparent rules, as without these there can be concerns that rules aren't being applied uniformly. Concerned ESO will favour specific technologies and thus reduce competition. Call for codification, regular review and transparent decision making processes to mitigate these risks.	Please see Innova's CMP434 response to Question 5 Element 3 for a detailed response. Innova agrees with the proposals in Element 3 for CMP435 and has no further comments.	Please see Innova's CMP434 response to Question 5 Element 3 for a detailed response. Innova agrees with the proposals in Element 3 for CMP435 and has no further comments.	Please see Innova's CMP434 response to Question 5 Element 8 for a detailed response. Innova agrees with the proposals in Element 8 for CMP435 and believes it is important the longstop date is forward calculated from the date of the Workgroup Consultation CMP435. Gate 1 offer is accepted and would not support it being back-dated from the date the original connection offer was accepted.	Suggests the Proposer has not given sufficient assurances that Project Designation will not have a detrimental impact on the connection offer of any other projects. Concerns much the same as Element 1 i.e. needing clarity on CRM in order to ensure certain technologies are not unfairly accelerated to connection over others.	Please see Innova's CMP434 response to Question 5 Element 11 for a detailed response. Agrees with the proposals in Element 11 for CMP435 and has no further comments.	Believes it would be impossible to check for duplication if they are checking evidence of less than 100% of the projects. Advises the ESO should explore Artificial Intelligence tools to enable checks on 100% of the land options evidence. If manual to use publically available data on HMLR to check 100%	Please see Innova's CMP434 response to Question 5 Element 14 for CMP435 and has no further comments	Agrees with concept, however believes the criteria and rules for the CRM should be codified in the CUSC. Mentions concerns again regarding discretion being introduced into the connections process via the Methodologies	Believes there should be an Agreement to Vary (ATV) for each individual offer, rather than applying a blanket legal front end. Concerned about the limited time available for Users to comprehend the full scope of the CMP435 modification and to submit a modification application that meets the Gate 2 criteria. Respondent suggests projects in existing queue have option to reduce their Transmission Entry Capacity (TEC), Connection Entry Capacity (CEC), or Demand as part of Self Declaration Letter for Gate 2. Strongly supports the adoption of a hybrid agreement for staged projects. For projects that receive a Gate 1 offer, Securities and Liabilities should not apply, and any necessary refunds should be provided 28 days after the end of the current security period	No comments to summarise
10	Getlink	Alice Varney	Interconnector	Positive	Positive	Positive	Positive	Negative	Positive	Negative	Positive	Positive	Positive	Positive
Summaries				Believes there needs to be stakeholder engagement before market consultation to ensure effective industry knowledge. Advocates for continuous review periods for methodology documents to keep them relevant and fit for purpose, with regular opportunities for market re-consultation and Authority approval. Additionally, suggestion for industry feedback on guidance documents.	Agrees, but noted that this drafting represents significant changes, particularly for interconnectors and OHAs.	Respondent agrees. See the response to Question 5 Element 3	Supports the introduction and acknowledges the need and suggests an extension of the ESO's discretion. Emphasizes the importance of objective terms in the decision-making process to avoid bias, especially where grid capacity is contested. Also supports the commencement of Longstop Dates from the date projects become akin to a Gate 1 contract	Respondent expresses concerns that ESO already has available similar powers, and that any extension of such powers requires a comprehensive dedicated review. Current workgroup does not have the time.	Respondent broadly supports the Gate 2 criteria. However does question the broad stroke applicability of minimum operational timescales of 20 years to any option agreement as the lifecycle of a project will vary significantly across technologies. Believes it would be more appropriate for this figure to be technology specific, for instance 15 years	Find it difficult to comment on the viability without confirmation on the percentage of projects. Further clarification from this topic from the ESO.	Respondent supports the principle outlined. However note that the 12-month process in which to identify and secure land rights/options for a new Project Site Location may be unreasonably tight for certain technology types.	Respondent agrees. See the response to Question 5 Element 1	Respondent agrees with the main principles. Highlights the complexity within CMP434, particularly the assumption that the economic assessment for GB interconnector/OHA connection points occurs during the Gate 1 process, whereas it typically happens after signing the original connection agreement. Also highlights the risk of changes and suggests that the Longstop Date duration should only begin after the economic assessment is concluded and any potential changes to the connection point are confirmed.	Respondent broadly supports and understands the logic. Concerned that mechanisms contained within the Connection Reform is already leading to detrimental impacts on those projects which are currently progressing through the existing process. Consideration needs to be given to ensure that similar disruption is avoided through the transitional process/ cut over arrangements.
11	Aquind Limited	Vladimir Temerko	Interconnector	Positive	Positive	Negative	Negative	N/A	Negative	Positive	Positive	N/A	Positive	Positive
Summaries				The respondent believes the ESO needs to clarify as soon as possible how the methodologies will be developed, reviewed by industry and approved by Ofgem for the implementation planned date.	No further comments outside of CMP434 response.	CMP434 captures the respondents main concerns. In respect of additional points for CMP435, the respondent urges the ESO to clarify on proposal as this requires developers to gather the information to justify receiving a gate 2 offer. They feel failure to do so provides significant project risks i.e. contract withdrawal.	No additional comments from CMP434 response.	No comments.	Respondent believes that any existing project that has applied for the planning consent at the go live date should not be subjected to gate 1 and gate 2 of the Primary Process. The main reasons raised are: 1) The project has already fulfilled the stated objectives of the connection reform by applying for a planning consent (significant work already undertaken based on existing contracts with the ESO including certainty around connection location and capacity) 2) Different developers may have different approaches to securing land rights. There is risk of undermining the way planning regime works in GB. If the ESO recalls connection from a well progressed project it can significantly undermine ongoing planning considerations at critical consent stages and breach legitimate expectations. This will also undermine investors' confidence in GB. 3) Administrative wise it's simpler, quicker and more robust to check if projects have submitted their respective planning application.	No additional comments from their CMP434 response.	No additional comments from their CMP434 response.	No additional comments from their CMP434 response.	Notwithstanding the feedback on Gate 2 criteria, the respondent agrees with the contracting groups and how existing contracts will be updated based on evidence provided. However they believe ESO should urgently clarify further details of the cutover arrangements including: 1. Will this apply to all modifications, including non-significant modifications? 2. How will invoices due for payment between now and developers receiving revised Gate 2 offers be managed? 3. Will historic payments (including User Commitment) no longer required be returned to developers? In what instances will/won't this happen?	
12	ESO	Alice Taylor	System operator	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive
Summaries				States that it should be required to establish how methodologies are approved by the Authority and to establish where the ESO will set out guidance	Believes the proposed solution outlines the projects that are captured under the existing connections queue	Believes the proposed solution clarifies any differences for specific customer groups and the reasoning for this.	Respondent supports the proposal of a Longstop Date	Respondent supports the proposal to create a concept and an associated non-codified Methodology	Respondent view is that the concept of Gate 2 criteria should be codified but the outlined criteria itself should sit in the proposed Methodology.	Suggests the evidence assessment set out in the proposal is required to ensure that evidence provided for each project is sufficiently robust.	Believes the suggested approach provides a strong and practical method for handling location changes in specific situations.	Supports the proposal that the proposed CNDM should not be codified. An ESO/TO CNDM will need to be created to establish the approach for conducting network design for the Gate 2 to Whole Queue process.	Respondent supports the proposed solution which clarifies the contractual changes when applying Gate 2 criteria to the Whole Queue and converting current connection agreements with the ESO to either Gate 1 or Gate 2 agreements	Believes defining Cut Over arrangements for ESO and TOs to migrate into the new process, in order to mitigate potential risks during the transition between the current and proposed new processes.
13	Ørsted	Alex Ikonic	Generator	Negative	Positive	Negative	Positive	Negative	Negative	N/A	Negative	Negative	Positive	Positive
Summaries				Seeking a higher level of codification. Note this process (and this obligation) does not currently exist. It is unknown whether it would be in place in time for the go-live date, as well as: Associated timelines; How it would function; and to which extent it would take on board feedback from industry following a consultation - both in the first instance, and on an ongoing basis. The detail these methodologies hold can fundamentally change project development risk levels, and there remains an outstanding risk that the ESO could modify these relatively easily/unilaterally	Believes there should be some nuances in how it is applied to different parties (especially where requirements are based on assumptions that certain activities should have been done by the developer in parallel)	Concerns i.e. the treatment of embedded projects under CMP435. Imperative that Ofgem (or DNOs) to notify the ESO, re-order the queue at distribution level, and re-allocate costs (where required) are in place and well related to industry prior to the go-live date. Believes these timelines must line up with those proposed for CMP435. Otherwise, embedded projects are at a risk of being disadvantaged. More discussions needed within the workgroup	Agree it is appropriate to start the clock on the longstop date from the time an offer becomes a Gate 1 offer. However, note that they have wider concerns with the concept of a longstop date which are detailed in response to CMP434.	Want justification from ESO as to why this is required under CMP435. Believe it is too broad in its current form, need to be more tightly defined. Want codification rather than Methodology. Process needs to be transparent, open and fair	Supportive of the proposed Gate 2 criteria, contingent on significant improvements in quality and availability of pre-application data. Gate 2 definition should be codified. Respondent suggests flexibility for some CMP435 projects, citing parallel land rights rather than 100%. Has more serious concerns regarding applying the Gate 2 ongoing compliance aspects to CMP435 projects as they are currently proposed. Therefore, and cannot support this Element as a whole - concerned if obligations are applied retrospectively they may disadvantage projects in various stages of the development process, which not have had foresight of additional activities they would (now) have been expected to do. Respondent suggests mitigation i.e. buffer period	No comments to summarise	No comments to summarise	Agrees with the principle of having a CNDM, and doesn't feel it is appropriate for the CNDM to be in a methodology document. Believes the outstanding unknowns and uncertainties associated with these aspects means we cannot support this element in its current form. With the restructuring of the queue, believes further discussions are needed with TOs on how changes would impact their investment programmes.	Timelines need to be set out more clearly	No comments to summarise
14	Drax Group	Paul Youngman	Generator/Storage/ supplier	Negative	Positive	Negative	Negative	Positive	Positive	N/A	Positive	Negative	Positive	Positive
Summaries				Respondent is not supportive of element 1 in the current proposal. They believe that without codification, this Element leaves room for legal uncertainty across the process. Respondent believes that codifying the Methodologies and the CUSC consultation process will ensure that obligations are enforceable through Code on all parties. Respondent believes the approach creates scope for inconsistency of application across different parties / cases and the methodology lacks legal weight in comparison to codifying rules. The respondent stated there is limited ability to make amendments if the methodology has unintended consequences or leads to negative outcomes, unlike self governance changes/urgent change process.	Respondent supports the overall approach. The respondent highlights that applicants submitting modification applications for existing connections are likely to have already secured land and relevant planning rights.	Respondent believes that there is insufficient justification and evidence to fully understand the benefits that Offshore and Interconnector parties will gain from reserving capacity at Gate 1.	Respondent believes it has 4 potential flaws preventing it being effective and that there is a lack of clarity and coherence in the impact of this element on AO and CUSC. 1. The longstop date at the proposed point of the process may have little impact because TEC won't have been allocated at this point and will be indicative. 2. No evidence has been presented to demonstrate the impact of a 3-year longstop date removing projects from the queue & lacks certainty if this limit is effective at progressing projects 3. If implementation of the longstop date does enable the removal of a significant number of projects, there could be implications on grid planning which may lead to suboptimal use of grid capacity. 4. The proposal doesn't set out any restrictions on applications repeatedly reapplying after having an application removed.	Respondent believes codifying the rules for project designation would allow for simple adjustments to be made. Encourages ESO to maintain transparency in the decision-making process with clear criteria for designation, and appeals (codifying would enable this).	Respondent is supportive of element 1 but feels a clear definition is required, specifically the area of generation or demand listing that requires delineation by a boundary plan. The respondent is supportive of sample checks of undefined number of applications but do not believe necessary for implementation. Respondent believes that without foresight of the terms and conditions in which a project would be granted advancement, it is unclear as to whether this Element is fair and provides assurance that it is governed effectively.	Respondent generally agrees with Gate 2 criteria evidence assessment but believes this criterion should be removed from the CUSC. The respondent is supportive of sample checks of undefined number of applications but do not believe necessary for implementation. Respondent believes that without foresight of the terms and conditions in which a project would be granted advancement, it is unclear as to whether this Element is fair and provides assurance that it is governed effectively.	Respondent generally supports this Element within the process - acknowledging the flexibility in event development details progress and enable adjustments in response to changes initiated by ESO or TO. The respondent believes that this Element places disproportionate emphasis on the developer's responsibilities, rather than those of the ESO and TOs i.e. there is no obligation on the ESO to provide a justification of any reasoning as to why a location site is changing. In the detailed development and legal text, the respondent believes there should be obligations on all parties, including the ESO, to ensure the changes are suitable from both a developer perspective and a connection process perspective.	Respondent is not supportive of this element as the methodology sits outside of the CUSC and the respondent believes this should be codified. Believes the proposal also lacks clarity detail for the example, the criteria that would be applied or defined triggers for when or how it would be utilised to reallocate capacity.	Respondent is supportive of this element as it will create transparency and a linear process for existing projects to move into the new process. Concerned that the timelines for existing parties in the queue to meet the relevant criteria are not realistic against the timelines that this modification is currently working to and urge for further information on how ESO plans to communicate deadlines with existing contracts.	Respondent agrees with the proposed cut over arrangements in that they allow for a period of time for existing projects to move into the new process.
15	Island Green Power	Sam Aitchison	Generator	Yes/No	Positive	Yes/No	Positive	Negative	Negative	N/A	Positive	Negative	Negative	Positive
Summaries				Doesn't agree that this Element is the most appropriate way of implementing the proposed solution. Major concerns that the use of Methodologies does not allow for the appropriate level of industry consultation and input for what will be major sections of the Proposer's solution for implementing Connections Reform. Notes that under the current proposal, whilst the ESO will be obliged to consult the industry, it has the potential that the solution will be very mis-informed and will not reflect how the development process actually works for the industry. Suggests that further codification along with published ESO guidance and interpretation would be appropriate.	No objections to the list of projects this will be applied to.	Can't see how it creates a fair market when interconnectors and OHAs are offered confirmed connection points and capacity at Gate 1 when others are only offered them on an indicative basis. Suggest that DTFC as a concept is a good idea. However, shows concerns as to how this will work in practice. Suggests to include how Offshore projects differ from the primary process and request further information.	Believes that a Longstop Date for Gate 1 could be a good way of incentivising projects to progress. Believes that the ESO discretion to extend a project deadline is OK, however where a project has some land signed but insufficient to meet Gate 2, there should be a minimum percentage, below which ESO discretion may not be applied.	Understands the rationale for the potential need for the Project Designation, however believes it moves away from the primary objective of the Proposal "First ready, first connected" into the Proposal that ESO wishes to pursue, it should be raised as a separate code modification. Suggests it is unclear how a Designated Project differs from a project developed through the Network Services Procurement. Notes that if this Element was to stay in the Proposal codification is needed. Believes it is unclear that a project, unless it facilitates more capacity on the network, is allowed to 'skip the queue'.	Believes that the Gate 2 criteria should be codified, stating that the LoA and application fee are both codified and fails to see reasonable justification for changing the convention. States that having the criteria set out in a Methodology does not allow for the appropriate level of industry scrutiny. Checks of evidence, defines the point of requesting the evidence in the first place and believes the ESO should be prepared to check for all connections. Notes that the project location is a key consideration under the current Proposal and hope surprise that the site address is not requested in the declaration letter. Suggests that duplication of option/lease areas is a very real possibility and should be considered when looking at the duplication checks.	Noted that if the offer at Gate 1 was to include a form connection point and date, this element would be unnecessary. Required clarification from the ESO on the previous before this Element can be agreed. Believe that once a project has been able to agree the new land there is no need for a Modification Application. Suggest an Agreement to Vary would be a more appropriate implementation. However, it could potentially cause an unfair advantage to those that had progressed through Gate 1 earlier than another project but then both projects go through Gate 2 at the same time.	Suggests that the CNDM is one of the most central Element for the Proposal and to not codify this Element and not publish and get Workgroup comments on the CNDM prior to the conclusion, is sidestepping the cruxes of how this proposal will work in practice. Suggesting that this will likely lead to a very chaotic first round, whether CNDM is approved by the authority or not. Suggests that "Capacity Reallocation Mechanism" should be a defined term. Concerns that if the ESO was to get the reallocation incorrect or against industry expectations, and it does not codify the methodology it will the ESO highly vulnerable to legal action	Suggests that for group 1, only changing the relevant clauses in the CUSC is not going to be a strong enough change to the connection agreement and it should be some through an Agreement to Vary. Concerns with group 3 over whether a mod app fee will be applied or not, stating that that it should not be as this is similar to the ESO's five point and the EOI for advancement, where no app fee was required. Concerns with group 4 as to why Transitional offers are not able to request advancement as it is their fault but the project has been fully studied and the need requiring them to submit a mod app is unreasonable.	No comments to summarise	
16	Orion Energy Development Ltd	Axel Wikner	Generator	Positive	Positive	Positive	Negative	Positive	Negative	Positive	Negative	Positive	Positive	Positive
Summaries				No comments to summarise	Suggests that ESO extends all offer acceptance deadlines to the date when CMP 434/435 enters into force or alternatively reduce securities to zero for today's equivalent of Gate 1 offers.	Find it currently unclear what a Significant Modapp is, and further guidance should be provided. Proposes that Significant Modapps are only applicable to Gate 2 projects	Find it currently unclear. Suggest that extension times for existing connection offers should be sized according to the current offer's connection date	Find it currently unclear. Suggest that guidance is provided with tangible criteria to help developers prioritise the connections and projects that are most beneficial to all parties	Suggested that to provide a level playing field for all developers active in the market, the timelines must be longer. Respondent suggested milestones and alternatives to manage the grid congestion whilst providing incentives for tangible projects. Believes it will provide strong incentives to take projects forward, provide predictability for developers and will increase renewable energy deployment whilst reducing the grid queue.	Agree except that red line boundaries should be allowed to overlap between connection points where the same amount of land could potentially be connected to two separate connection points.	Suggest measures should be taken to avoid moving connection points. Securing land can take more than 12 months and the developer will have resources securing additional land on the Gate 1 connection location. For scenarios with such extreme consequences for developers, they should be granted at least 18-24 months to secure land in a new location.	No comments to summarise	No comments to summarise	No comments to summarise
17	Enfinity Global	Alex Fornal	Generator	Negative	N/A	N/A	N/A	N/A	Negative	N/A	N/A	N/A	N/A	N/A
Summaries				Respondent is concerned that ESO is making decisions about the connections process without adequate consultation. Suggested that for projects not held by non-BEGGA-holding distribution connected projects, there is a need to clearly define the behaviour of DNOs to prevent unfair treatment compared to transmission-connected projects, by standardising the process.	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	Suggested that the forward calculated milestone for submitting planning for BESS projects be 12 months from date of Gate 2 offer acceptance.	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise
18	Commonwealth Asset Management (CWAM)	Peter Rumbold	Demand	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Positive	N/A
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	Agrees that the ESO should have the power to accelerate the queue position and connection date of designated projects. However, greater consideration should be given to prioritising strategic demand projects that are critical to driving economic growth and that align with the government's industrial strategy, suggesting the Project Designation Methodology criteria should be revised to include strategic demand projects that align with the Government growth and industrial strategy objectives.	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	Supports the Proposal that projects in the queue must self-certify whether they meet Gate 2 and, when doing so, can request an earlier connection date. Highlights the need for appropriate resourcing and a robust approach to sample checking.	No comments to summarise

19	Flotation Energy Ltd	Calum Watt	Generator	Negative	Negative	Negative	Negative	Positive	Negative	Negative	Positive	Negative	Negative	Negative
Summaries				Respondent believes detail of methodologies is very limited and requests visibility of key documentation to allow industry comment.	Respondent believes that projects who have submitted a ModApp should be permitted to amend contracts ahead of January 1st 2025 without going through a new process. More clarity required on Embedded demand impact.	Respondent generally supports this element but believes further clarity is required on provisions for Offshore projects. Believe advanced/consented projects should be able to make changes to amend completion dates or request TEC changes.	Respondent suggests that a security commitment or holding fee may be a better alternative than a set Longstop Date.	Respondent supports the concept, suggesting it should be used to progress or fast track innovative or rationally significant projects. Developers should be able to submit proposal for the ESO to consider.	Respondent believes that projects which meet Gate 2 criteria and have consent should be given the opportunity to connect earlier if desired. Applies to both CMP434 and CMP435.	Respondent feels that further detail is required to fully assess the impact but does support the outline concept.	Respondent believes this will likely benefit offshore projects.	Respondent suggests they cannot comment until there is a comprehensive CNDM and Gate 2 Criteria provided.	Respondent believes that existing consented project should be able to ModApp before 1st January 2025.	Respondent believes that existing consented project should be able to ModApp before 1st January 2025.
20	UK Power Networks	Ross Thompson	Distribution Network Operator	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	Broadly agrees but concerned about some consequential impact of this element, such as: impact on distribution customer quotes. States that this solution will require all DNOs to implement it, and believes a clear instruction for all DNOs to comply with the requirements of the solution should be included in the proposed legal test for the CUSC modification of CMP 435 (and 434). Advises thought needs to be given to the consequential impact of a connection agreement of an embedded generator being converted to a Gate 1 agreement. Suggests that very often, distribution customers are sharing costs and liabilities associated with the upstream agreements with the ESO and any change to the status of one customer can have a significant commercial impact on those remaining. Advises that the solution being proposed must directly deal with this to ensure it remains aligned with the intent of the Connections Action Plan and results in true benefit to the system and all users.	No comments to summarise
21	FRV Powertek Limited	Ravinder Shan	Generator / Storage	N/A	Yes	N/A	Yes	Yes	Yes	Yes	No	N/A	Yes	Yes
Summaries				Respondent supports the proposal for Authority approved methodologies, whilst they understand the need for flexibility they urge that these methodologies are published as soon as possible so that they can be approved in time, as approval is contingent on the implementation of connection reform.	No comments to summarise	No comments to summarise	No comments to summarise	The Respondent supports the proposal in principle but lacks understanding of how it will work. i.e. How will a project be designated, what will be application process to be designated? Will this favour certain technologies over others? Will this favour certain locations over others?	The Respondent supports this element. They believe for planning compliance reasons, milestone 1 should be aligned with Workgroup recommendations. Proposes that that milestone 1 should be calculated back from connection date for projects where connection date is more than 6 years from the Gate 2 offer date.	The Respondant is supportive and has made suggestions to add Requested Point of Connection' as most of the existing offers (Step 2) have only indicative nodes as POC. They also suggest adding 'Planning status'.	The Respondent does not agree that this element aligns with the 'First Ready, First Connect' objective and believes it does not meet the MVP criteria. Respondent suggests that if the offered Point of Connection is different then the developer should go back to Gate 1 and reapply whenever ready for Gate 2 at the new location. Respondent suggests it is unfair to hold the queue position for 12 months as there might be other projects at this new POC who have met Gate 2 criteria later but are ready to progress.	The Respondent agrees with the approach but needs to see the document to assess if the methodology aligns with the objectives. Respondent suggests that for the existing queue, the new position should be assessed based on the progress of the project.	No comments to summarise	No comments to summarise
22	EDF Energy	Jonathon Hoggarth	Generator	Negative	Positive	Negative	Positive	Negative	Positive	Positive	Positive	Negative	Negative	Negative
Summaries				Believe there is a lack of clear definition for key documents and processes, which is making it difficult to reach an agreement. Advises that the "appropriate" level of codification is unclear and the industry should be given enough time to review the final proposed solution.	States that this section would benefit from further clarification on this applying to both licenced and unlicenced DNO connections.	Respondent concerned regarding the unintended consequences of this and believe it should be further explored and more detailed on how this will all be holistically coordinated. With regards to Offshore projects, the interaction between Gate 1 and future seabed leasing processes is unclear. Alongside costs involved in applying for Gate 1 and uncertainty around the T&Cs and liabilities once it has been secured.	Agree with the need for a Gate 1 longstop date	Agrees with the concept, however do not believe that this element should form part of this proposal. Suggested that is part of a separate consultation and this element would give the ESO significant powers to prioritise certain transmission connections without a dispute process.	Believe that restrictions on building outside the red line boundary are unnecessary and questions the arbitrary 50% TEC inside the boundary requirement. Disagrees with the proposal of assuming that land and planning work are done in parallel. Suggests the crucial date should be when the applicant commences preliminary discussions with PINS, showing serious intent to deliver a project. Recommends implementing measures similar to Queue Management milestones and highlights the difficulty in legally challenging any disagreements if the Actual Gate 2 criteria are not completed correctly.	No concerns with the process	Agree with the principle that this is required. Concerned that due to requiring to landsite boundary changes this therefore opens up further engagement/development work. In this instance the respondent believes that the 12-month period is inadequate to resolve the issues and recommend that a 24-month period time frame would be more suitable	Respondent supports this. However, it is challenging to assess the proposed introduction due to the absence of specific details, and the solution appears to be ill-defined.	Believe further clarification is needed with regards to contractual changes. Lack of clarity on TEC reductions. A full compensation strategy should be implemented.	Concerned regarding the limited detail for outcoter arrangements, with particular uncertainty regarding the securities for 2024-25. Additionally, there is ambiguity surrounding how costs would be allocated to other projects if customers drop away from a connection via a distribution arrangement
23	MaresConnect Limited	Holly Burke	Interconnector	Positive	Negative	Positive	Positive	Positive	Negative	Positive	Positive	Positive	Positive	Positive
Summaries				No comments to summarise	Disagrees with interconnector projects with existing connection agreements going through the Primary Process and is requesting that they are excluded in the final proposal because of the i) Financial burden and additional risk, ii) Inconsistency with Ofgem Cap & Floor regulatory processes and iii) Retrospective effect for interconnector and OHA projects.	Concerns that a longer timeframe for existing interconnectors being considered in Ofgem's Third Cap & Floor Window is needed, if the final proposal applies to interconnectors.	No comments to summarise	Suggests that all electrical Interconnectors with a GB Interconnector licence, which have obtained Cap & Floor Initial Project Assessment status should automatically gain Project Designation status. Interconnector projects that do not attain Initial Project Assessment status from Ofgem should not necessarily be barred from this Project Designation status but should be allowed to apply for this status as any other project and be considered on a project specific basis.	Raised the following additional concerns in relation to the criteria for demonstrating Gate 2 has been achieved: <ul style="list-style-type: none"><li>- There needs to be flexibility with regard to the redline boundary, which along with narrative provides evidence that the project is in line to attain permits to ensure the connection date can be met.</li><li>- Important infrastructure may only pass Gate 2 after completing the compulsory purchase orders (CPO) process, which can be a lengthy and expensive process and would significantly reduce the appetite of investors to risk funding a project where they cannot be guaranteed a connection date. Instead, National Grid should try to understand the land strategy of Interconnector projects.</li><li>- Does not believe that the land capacity calculation assessment criteria is appropriate for an Interconnector and appears to be targeted towards Generation projects. For Interconnector projects, the adequacy of the land interest should be project specific and appropriate for Interconnector converter stations.</li><li>- The planning timescales provided are arbitrary and each project should be judged on its merits providing narrative to National Grid to ensure that the project can demonstrate that it will meet its connection dates.</li></ul>	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	
24	Google	Brian Denvir	Demand	Neutral	Negative	Neutral	Positive	Positive	Negative	Neutral	Neutral	Neutral	Neutral	Neutral
Summaries				See response to CMP434	Doesnt support the application of the proposed connection process to contracts classified as 'connected'. The objective of the proposal is to ensure that viable projects can connect - connected projects have already demonstrated themselves to be viable. Changing the terms of connection agreements for assets that have already been energised creates uncertainty for investors and would undermine confidence in the connection process.	No comments to summarise	See response to CMP434	See response to CMP434	Reiterates comment to element 3. For existing contracts where none of the reservation has yet been energised, Gate 2 compliance requirements must take into consideration the special case of applications with phased project stages. It is essential that the process for ongoing Gate 2 compliance takes this into account for applications with phased project stages. To accommodate such cases it is recommended that the Gate 2 process include the same mechanism set out under element 8, whereby the ESO has discretion to extend the longstop timeframe in Gate 2	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise
25	Zenobe energy	Duncan Hughes	Storage	Positive	N/A	Positive	Positive	Positive	Positive	Positive	Positive	Positive	N/A	N/A
Summaries				Respondent agrees that specific guidance does not need to be codified. Respondent considers it vital that this guidance, in particular Gate 2 related requirements for developers and ESO's proposed discriminatory powers under Elements 5, 11, And 16) are unambiguous and consulted on appropriately.	Respondent states it should be possible to submit Mod Apps for existing connections or projects that have passed gate 2 already to avoid delays in M&A transactions.	Respondent has no further comments	Respondent is supportive of the long stop date implementation and believes three years is reasonable.	Respondent is supportive of the element in principle but this is dependant upon there being strict guidance as to when a project would qualify for designation. Respondent also believes there should be minimal opportunity for ESO to subjectively designate projects and approach should not be used as a first option for bringing forward specific project types.	Respondent generally supports this element but does not believe the forward timescales mechanism is appropriate given some projects could pass Gate 2 whilst still having a connection date in the far future. Respondent also proposes the back-calculated mechanism is retained.	Respondent supports this proposed element.	Respondent generally supports this proposed element. However, they note the 12 month period is challenging and not likely to result in 100% success rate.	Respondent supports this proposed element but highlight the importance of developing the methodology and consulting on it as soon as possible. The respondent expressed concerns that developers could spend material sums to achieve Gate 2 and then be required to pay again in order to benefit from having passed the Gate.	No comments to summarise	No comments to summarise
26	Enviromena Project Management UK Limited	Mark Harding	Generator	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise
27	Statkraft	Barney Cowin	Generator	N/A	Positive	Positive	Positive	Positive	Positive	Positive	Negative	Positive	Negative	Positive
Summaries				Broadly support flexibility that comes with non-codification, also believe the requirement for a formal consultation process and Authority approval gives the safeguards needed against the ESO making material changes without scrutiny. no indications have been given about whether any of the Gate 2 Criteria Methodology would be applied retrospectively. Strongly suggest that the Methodology cannot create a requirement to vary existing option agreements to make them compliant as this is likely to have the effect of turning/viable projects into unviable projects and will erode investor confidence. Same point applies to the Project Designation Methodology and Connection Network Design Methodology.	Further discussion is needed to confirm if Directly Connected Demand should be included in the same process when it may not follow the same development process and be of greater value in project designation	Notes the suggested process differs noticeably from processes that have been followed with recent offshore wind leasing rounds. Doesnt suggest that this should prevent the clarifications from being progressed, only that it might be prudent to ensure that there is sufficient process flexibility to allow for future changes to process. Advises the Proposer is no longer proposing to more formally integrate both the Crown Estate and Crown Estate Scotland into the connection application process. Given recent developments with Great British Energy and Crown Estate, we suggest that it might be appropriate to review this issue to understand whether the changing circumstance mean that this scope decision should be revisited.	Longstop should be longer – 4 years. Suggest a mechanism to check in to validate for network planning knowledge but then they won't have visibility of those projects which will apply for both together	Concerns that non-codification of the rules and the fact that the Project Designation Methodology sits outside of CUSC might allow the rules to be applied inconsistently, possibly resulting in unfair discrimination against particular projects or developers. unclear exactly what the scope of Project Designation will include, and require that more detail and/or case studies are provided	Respondent reflects that they are unsupportive of Element 11 - wants clarity of whether the requirement for a 3 year option period is a minimum of 3 years from the date on which the option agreement is entered into, or a minimum of 3 years from the date on which the Gate 2 application is submitted. Continues to have reservations about the use of option agreements as representing a robust mechanism for achieving the objectives. Respondent wishes for clarity from NGE/ESO as to definition - concerned that lack of definition can lead to inconsistent application. Advises that the position that the ESO does not propose any exemption for a developer using powers of compulsory acquisition appears illogical. Wants more flexibility for land rights requirement and red line boundary. Timescales are unreasonable.	No clear explanation as to how duplication checks will be managed for co-located projects, a single project might have two technologies at the same location. There might be a single option agreement or have two overlapping option agreements. In either case there is a risk that that would fail a duplication check, despite the fact that there is sufficient land for both projects. Advises on the need for templates and adequate timing for submission to be confirmed in guidance. Pre app service required to consider acceleration opportunities. The redistribution of capacity needs to be clarified throughout the CMP434/435 process.	12 months is not enough time to meet meet Gate 2 criteria on an entirely new plot of land and so may be of limited value. Including the mechanism could lead to 12 month pauses on projects while developers assess their options, which doesn't help with queue reduction. Suggests that the proposed guards against this (loss of original site etc.) would appear to have limited effect – if the original site is unusable due to lack of grid connection then it is no great issue to lose it.	States that the development of CNDM is critical to understand the reallocation of capacity and the guidance must be developed alongside industry workgroup and published for reference in advance of implementation date. Whether this may also link to ESO powers of project designation needs clarifying.	Advises that timing / process for contractual changes needs detailed methodology and advance notification to be able to deliver in Q1 2025. A revised contract must be issued alongside update of the security position then required.	No comments to summarise
28	Uniper UK Ltd	Paul Jones	Generator	Negative	Positive	Positive	Positive	Negative	N/A	Positive	Positive	Positive	Positive	N/A

Summaries				Respondent does not fully support the proposed Authority approved methodologies and ESO guidance, but does acknowledge in some instances it could be sensible to have separate guidance/methodologies for a process i.e. Project Designation Methodology.	Respondent states proposal seems sensible.	Respondent believes proposal is appropriate, as any difference in treatment has been proposed in response to the particular circumstances of the two main categories of connecting party (ie DNOs and offshore assets).	Respondent is believes that projects should be discouraged from entering the process too early, so proposal seems appropriate.	Respondent is states there is too much uncertainty/lack of detail on how the process will run, with potential to be highly contentious. Should not be implemented into the process until more detail is known. Feels it is not required for MVP.	Respondent is does not support this element fully which is covered in element 1 response. States even if the concept of the criteria is also introduced in the Transmission Licence, it does not follow that the detail should be contained in a methodology.	Respondent is agrees with the evidence required for the assessment, but believe that this should be set out in the CUSC, rather than in a separate methodology as has been proposed.	Respondent believes the proposal is sensible if a project is subsequently offered a connection point some distance from the one they requested, for there to be a time limited opportunity for the developer to move the project closer to the offered point. However, there is lack of clarity on how likely and often this provision would be needed. The respondent believes that the use of provision should be transparent for wider industry to avoid misuse.	Respondent believes this is an area where a methodology would seem appropriate, although it could be set out in the SOTO code.	Respondent believes proposal to be appropriate.	Respondent believes proposal seems to be sensible as long as there is not a significant delay in the implementation of CMP434 and 435.	
				The respondent feels some of the proposed areas should still in the CUSC i.e. Gate 2 Criteria due to it forming a key part of the process.											
				The respondent believes the proposed Connections Network Design Methodology could be a valid candidate for a licence based Methodology.											
29	Haldane Energy Limited	Lawson Steele	Demand	Positive	Positive	Positive	Negative	Positive	Negative	Positive	Positive	Positive	Positive	Positive	
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	Respondent proposes that the current User Progression Milestone M1 date (Secure Land Rights) as introduced by CMP376, be used as the date by which the User has to demonstrate compliance with the Gate 2 criteria.	No comments to summarise	Respondent agrees with the criteria but emphasises that new technology types may have different requirements, making it difficult to meet a narrowly defined set of criteria. Suggests the need for flexibility and discretion in determining the actual requirements.	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	
30	Northern Powergrid	Luke Scott	DNO	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	
31				Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	
Summaries				Agrees with the development and approval of the three proposed Methodologies, however if the "Gate 2 Criteria Methodology" was not approved prior to the go-live date, this would cause lack of transparency and a sub-optimal outcome	Agrees with the type of connection projects which will follow the primary process	No comments to summarise	No comments to summarise	Believes that projects that are crucial for system security and efficiency should be prioritised, however this process should not unduly discriminate against other legitimate projects from being brought forward in the queue due to not meeting all stated requirements. Believes additional transparency and criteria from TDOs and ESO is needed on this element, along with a dispute process if a developers queue position is adversely affected.	Generally agrees with the Gate 2 criteria. Stated that the RLB submitted at the gate 2 application stage cannot be expected to include any connection cable and User offer information at that stage as the location of the Connection Point isn't confirmed until the Gate 2 offer is issued.	Generally agrees with evidence assessment and the ability to advance with contracted connection date within the self-declaration letter.	Generally agrees with the Proposal, however suggests the 12 months might not give the developers enough time to accommodate changes. Suggests the ESO should offer a range of suitable alternative locations and more effective information on these locations at earlier stages.	Suggests an improvement would be to codify the proposed capacity reallocation mechanism as not codifying it might increase the risk of disputes among stakeholder and the lack of transparency.	No comments to summarise	No comments to summarise	
32	SSE Generation Ltd	Garth Graham	Generator/Storage/ supplier	Negative	Positive	Positive	Negative	Negative	Negative	Positive	Negative	Negative	Neutral	Neutral	
Summaries				Does not support the proposed widespread use of guidance documents by the ESO (and by implication reduced change control) that risks imposing unilateral and disproportionate new and additional obligations/requirements onto connecting Parties. It is important that documents pertaining to or containing Parties' Terms & Conditions for connection are subject to Authority approval and guidance is limited to adding the understanding of what is written in the Code.	Believes this element has merit as it is consistent with the intent of TMO4+ arrangements. As long as it is applied to all existing contracted projects that are within scope - as shown in the table at the top of Page 11 of the consultation document; and is legally robust, it should be non discriminatory.	Believes that a case has already been made for a different approach for the application of the primary process for Offshore projects, given the seabed leasing arrangements in GB waters.	Believes that securing agreements can take significantly longer than the proposed period, set out in CMP435 original, and may prejudice negotiating positions to the detriment of the developer, who is caught between the needs of connection to the system and the desires of the counterparties, overlaid with the short time period allowed. The respondent suggests that a Gate 2 Criteria Exemption should be considered to allow for developers who need to obtain land via compulsory purchase order (CPO) powers.	Has concerns with aspects of this Element and the lack of detail at this stage. Suggests that a more markets-based approach with transparency over what the system requires (rather than unilateral designation by the ESO) would be a better way to ensure that the specific criteria set out in Element 9 are met. Believes that consideration also needs to be given to the planning regime for Transmission asset and project developer asset build out, which may be subject to significant change in the future to reflect the new aspirations of the UK Government.	Believes that by allocating Transmission capacity, on the basis of first-to-secure land, does not mean that resource will be allocated to projects necessary to deliver a secure and sustainable energy system that meets net zero. Advises that the RFI analysis provided by the ESO on 5th August also indicates that the proposed solution may not have the desired effect. The planning timescales set out in the proposal are also unreasonable, and need to recognise the challenges that projects face in terms of obtaining permission in the first place; and where the connection date is many years in the future and the planning permission lapsed. The Development Consent Order (DCO) process also needs to be considered, as the red line boundaries will have a high degree of alteration following conversation with the local community, planning authorities and statutory undertakers. Believes it is unreasonable and poses an unrealistic financial burden on developers to invest substantial amounts without a confirmed point of connection (POC), which is only provided at Gate 2. Suggests that a more realistic timeframe for DCO projects would be three years; and LPA projects would be two years.	Believes this element is a necessary part of the solution to deliver the aims of TMO4+. Suggests that the level of sample checking to be undertaken by the appropriate network operator should be determined by the Authority to ensure an optimum balance between market risk assurance and developer compliance on the one hand, and a 'reasonable, efficient and proportionate' process on the other hand.	States this element will allow a degree of flexibility to developers where circumstances between Gate 1 and Gate 2 applications result in a need to alter, within reasonable limits, site boundaries, but believes there would also be merit in allowing for the possibility of a project moving to somewhere that is the same distance from the connection point as the original location. Believes that the current proposed provision of twelve months for a developer to relocate a significant proportion of the land following a reassignment of their POC location causes significant issues for large scale projects with significant land requirements. Suggests the time period may be suitable for technology types with low land requirements, but it unduly discriminates against large-scale projects who may be forced into negotiations for up to 50% of the required land within a 12 month deadline. The Respondent suggests that the confirmation of a POC should be open to dialogue between ESO and the developer and should not be imposed upon the project.	Is principle is supportive of the use of the methodology that flows from a licence condition. But as they have yet to see the details of the licence conditions and the detail of how it is proposed to operate in practice, they are unable to currently support this Element.	In reference to Group 4, seeking the Authority's approval for implementation of Transitional Arrangements prior to a decision on CMP435, appears to pre-empt the outcome of CMP435.	Believes that given the revised timescales for an Authority decision and the fact that this cut over period would not start until 10 Business Days after the Authority's decision, they consider these cut over arrangements to have limited impact.	
33	Ekv Energy Limited	Nicky Ferguson Limited	Storage	Positive	Positive	Positive	Positive	Positive	Negative	Negative	Positive	Positive	Positive	Positive	
Summaries				No comments to summarise	Respondent agrees with inclusion of the mentioned parties but would like clarification of the process for smaller embedded generators.	No comments to summarise	No comments to summarise	Respondent agrees with the proposal and associated methodology but highlights that it will be critical the methodology is scrutinised by Ofgem and the public through consultation.	Overall the Respondent does not agree that the Gate 2 criteria will achieve the required impact on the relevant objectives due to the significant additional administrative burden for the ESO without sufficient enough improvements to the queue length, failing to reduce connection timelines. It will create more costs and uncertainty for generation. Respondent believes it requires more stringent criteria or payments. Respondent does however agree with ongoing compliance (11.2, 11.4) but is unclear how planning can be achieved with indicative milestones and connections far into the future. They do also agree with 11.3 but believes there should be an appeal process.	However, the respondent makes some suggestions that the self declaration letter of land right should be included as evidence with additional criteria to act as a better filter of projects. They also propose that any more stringent criteria/evidence is supplemented by an additional fee to apply for Gate 2 which should deter projects which are only speculative.	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	
34	National Grid Ventures	Andy Dekany	Interconnector	N/A	N/A	Negative	Negative	Positive	Negative	Negative	Negative	Positive	Negative	Negative	
Summaries				Agree with the principle. Concerned that only ESO will have the authority to propose changes at its own pace. Suggests to make it obligatory for ESO to engage with the industry after 3 months on any changes proposed. If the industry proposes changes that ESO isn't inclined to take forward, Ofgem should have a step to indicate to ESO that such proposals should be formally proposed and consulted upon alongside any that ESO wishes to take forward. This process would be repeated around 8 months after implementation and in subsequent years, it could become an annual obligation. Believes that the "Significant Modification Application" guidance and "Material Technology Change" guidance are better suited to be set out as Methodologies.	Believes Ofgem is actively developing connection arrangements for Offshore Hybrid Assets, with a consultation on the arrangements for Non-Standard Interconnectors expected in September 2024. Suggests it is important to consider how the connections reform process aligns with these arrangements when determining the scope of projects that will go through the Primary Process.	The respondent finds that the proposal currently lacks explicit details about the Gate 1 contract for existing ICNHA projects that haven't met the Gate 2 criteria by the deadline. Recommends that the Longstop be set only when the substitution location and the developer should be allowed a free Agreement to Vary to adjust the Completion Date. Using Land as the primary focus in criteria is deemed inappropriate for ICNHA projects. Concerns about red line boundary constraints and forward-facing queue management milestones.	Agree with the approach. However, a fixed 3-year Longstop is based on the incorrect assumption that all projects follow a linear path to land acquisition. Suggests the process may result in certain technologies with low hurdles gaining priority over others. Advises that using Land Rights as part of the Longstop and Gate 2 is not suitable for ICNHA projects as land constraints are usually low in the selection criteria. Advises that requiring developers to acquire land before gaining Compulsory Purchase powers conflicts with the ability to benefit from those powers. Believes that it is impractical to acquire all land rights needed by voluntary agreement for long linear projects. The recommendation is to set the Longstop to the backdated Queue Management Milestone M3 (Land Rights) for ICNHA projects.	Suggests to incorporate a Designation route that allows flexibility in the Gate 1 and Gate 2 processes. Recommends that the flexibility should work both ways, allowing for the case-by-case relaxation of the timetable for Gate 2 and subsequent milestones if the criteria in the Methodologies do not function correctly for certain projects. Points out that adjustments to the red line boundary used in the original Gate 2 application should be allowed if Compulsory Purchase powers have been used. Suggests it is not feasible for all project types to submit their application for planning consent early as it is not possible to undertake all the necessary survey work and consultations.	The respondent is concerned about the proposed timelines and the impact on projects with connection dates far into the future due to requiring large-scale reinforcement. Highlights the issue of submitting applications for planning consent to necessary survey work and consultations being not feasible for all project types. Points out that adjustments to the red line boundary used in the original Gate 2 application should be allowed if Compulsory Purchase powers have been used. Suggests it is not feasible for all project types to submit their application for planning consent early as it is not possible to undertake all the necessary survey work and consultations.	Respondent is concerned regarding the "one size fits all" approach whereby "Land Rights" are considered the criteria that apply to all projects. Certain technologies criteria other than Land Rights are more appropriate	Respondent finds the process as written as part of the consultation is unclear, and therefore further consideration is required.	Respondent acknowledges that this document is crucial. However, without the methodology draft, they are unable to provide comments beyond recognising its importance to the proposed process by CMP434.	Believe the intentions of the proposal may be acceptable, but is currently ambiguous and not explicit in defining the details of the Gate 1 contract for existing ICNHA projects that have not made the Gate 2 criteria by the deadline. Return of Securities should be handled promptly.	Respondent finds that due to the lack of clarity, they are unable to comment. And urge the ESO shares a detailed timetable with industry. Recognises the ESO are not in a position to share the designation letters with Ofgem, however visibility of those letters will help clarify the process for transitional arrangements and cut over arrangements	
35	Scottish Power Renewables	Deborah MacPherson	Generator	Negative	N/A	Negative	Positive	Positive	Positive	Negative	Negative	Negative	Positive	Positive	
Summaries				Respondent acknowledges that the proposed documentation under Element 1 is limited in scope, which is why they cannot support the proposed solution. Emphasizes the importance of developing separate methodology documents to ensure that each methodology is easily understood and accessible to all stakeholders, with clear rules, criteria, and policies. Suggests expanding the scope of Authority approved Methodology to include other key documentation such as Significant Modification Application Guidance, Material Technology Change Guidance, and Letter of Authority Guidance. This expansion would prevent discretionary application by the ESO/TOs and ensure that any amendments follow proper process and engagement.	Respondent agrees with the listed projects for the Primary Process but suggests considering the impact of directly connected projects on the DNO network under the TMO4+ process. Mentions the CUSC Modification CMP 326 and believe that the TMO4+ arrangements should fully address the impact of these connection types.	Respondent suggests further consideration should be given to the primary processes for customer groups. Concerns are raised about the proposed approach to the DFTC, which governs embedded small and medium power stations, and the potential risk of unfair treatment for embedded customers. The Respondent advised the current proposals lack detail on the ESO/DNO interface. Additionally, the Respondent suggests revisiting a previous proposal involving the Crown Estate securing future leasing rounds as part of Gate 1 as this could be beneficial and there are lessons to be learned from past issues with the HND process.	The Respondent supports introducing a longstop date for Gate 1 Agreements but highlights the need for published guidance on requirements and fair decision-making. Suggests extending the discretion to DNOs/IDNOs and express concerns about developers securing minimal land agreements. The Respondent believes the proposed criteria may encourage unhelpful behaviour from Land owners, Agents and Developers). For offshore development, they recommend further consideration due to the complexity of the proposal.	Respondent recognizes the benefits of introducing Project Designation to fulfil the ESO's license obligations. However, they emphasize the need for a clear and transparent governing methodology to avoid the problems encountered with the Pathfinder Projects.	Respondent agrees that existing option agreements should not have a 3-year minimum length requirement and suggests using the implementation date as the threshold. Supports the idea that achieving the QM milestone M1 should be sufficient evidence for Gate 2. They emphasize the need for clarity on ongoing compliance monitoring and minimum requirements. Agrees with constraints on building outside the red line boundary and the requirement to submit planning within a specific period after Gate 2 Offer Acceptance. The Respondent suggests further consultation on planning and clear guidance on criteria changes and reviews if the Gate 2 criteria is not codified.	Respondent agrees with the Gate 2 Criteria Assessment. They emphasize the need for secure storage and confidentiality of this information. Suggests making land documentation available upon request to minimize administrative burden. The Respondent questioned the ESO's capacity to manage the checking process and raise considerations regarding lease agreement sharing, reduction, and the potential need for an NDA. Supports the red line boundary checks and raising queries with both existing and new developers. Additionally, the Respondent agrees with not allowing changes to offers in the Gate 2 to Whole Queue process and oppose charging a mod-app fee for developers entering Gate 2.	Respondent disagrees with Element 14 regarding the Gate 2 Offer and Project Site Location Change. Expressed concerns about the risks and challenges associated with moving the project to a different connection point at the Gate 2 stage. The Respondent believes that such changes could make the project unviable and pose planning risks suggesting that a longer timeframe should be considered instead of the proposed 12 months.	Respondent emphasizes the need for transparency, scrutiny, and fairness in implementing the Connections Network Design Methodology (CNDM). Stressed the importance of clear processes and a methodology that ensures fairness across all projects.	Respondent suggests updating contracts for projects not meeting Gate 2 without signing an ATV to reduce administrative burden. Believes agreements should be updated if the landscape changes or improves, acknowledging the additional resource risk this places on TDOs but advising it is in line with their primary licence obligations.	The Respondent supports the cutover period but emphasizes the need for early communication of derogation outcomes. Expressed concern about the timing of the decision and the implementation deadline. Called for further consideration of the proposed changes, particularly regarding their impact on DNOs, existing agreements with staged projects, and the return of S&Ls and capital payments.	
36	Transmission Investment	Holly MacDonald	Transmission Owner	Negative	N/A	Positive	Positive	Negative	Negative	Negative	Negative	N/A	Negative	N/A	
Summaries				Respondent is concerned with the proposed approach to codify the "high level concept" of the Primary Process and have the detail contained within Authority approved Methodologies and supporting Guidance. Respondent believes the essential elements of the connections process, such as timescales for submitting and receiving offers at key milestones must be codified and/or outlined in the ESO's licence, as well as the detail of what customers will receive within key documents (e.g. Gate 1 and Gate 2 offer). Otherwise there is a risk of long delays, an example being the recent HND process, whereby holding offers (akin to the Gate 1 offer) were given with an 18 month delay between that and the formal offer. Respondent states if a Methodology approach was to be pursued, to ensure industry is able to effectively engage and plan resources to do so it should follow an annual process for review, consultation, approval similar to the Frequency Risk and Control Report.	No comments to summarise	Respondent agrees with the requirement for interconnectors and offshore hybrid assets to provide the land rights for the onshore converter station as evidence. Waives the requirement in Element 19, that if interconnectors or OHAs are allocated under Gate 1 under this modification that they retain the connection point and date as per their current agreement.	Respondent agrees that the 3 year long-stop dates should start from the point at which a project becomes akin to a Gate 1 contract. However as outlined in their response to Element 19, we are concerned with the proposal to retrospectively apply the Gate 2 criteria to existing projects in the queue.	Respondent feels it is unclear from the proposal how much, under Project Designation, a project could really "accelerate" versus other projects. Advises that in order to effectively comment on this proposal, there needs to be further clarity on how a project might accelerate, for example would it be within the "batch" of projects that started the process, remaining in a position to have passed the Gate 2 criteria.	Respondent is concerned that the proposal does not offer a clear path to a decision, and that developers who may need to obtain land via CPO powers. The Respondent view is that Gate 2 should allow for recognition that if a developer has moved into a CPO process, it has the powers to acquire the necessary land and it applies for Gate 1 or Gate 2.	Respondent feels it would be helpful to clarify further what is meant by "advance", and whether this opportunity would only be available to projects who meet the Gate 2 criteria before the proposed deadline of 21 January 2025. Advises further detail on how options for advancement would be identified, assessed and allocated to projects would also be required. States that the proposal refers to applicants paying an additional fee to be considered for advancement. However it is not clear if there is an incentive to try and seek an advancement, and pay the required fee, if there is little clarity on how this may be assessed and the likelihood of success.	No comments to summarise	Respondent states to be able to appropriately assess Element 14, there needs to be clarity, and/or flexibility, for developers who meet the Gate 2 criteria before the proposed deadline of 21 January 2025. Advises further detail on how options for advancement would be identified, assessed and allocated to projects would also be required. States that the proposal refers to applicants paying an additional fee to be considered for advancement. However it is not clear if there is an incentive to try and seek an advancement, and pay the required fee, if there is little clarity on how this may be assessed and the likelihood of success.	No comments to summarise	Respondent is concerned with the proposal to apply the Gate 2 criteria to the existing queue, and as such change the contractual arrangements of developers with respect to grid connection. Suggests that there appears to be no assessment of the legal feasibility of this proposal, as well as it is primarily being outside of the scope of the initial proposal for connection reform.	No comments to summarise
37	Electricity North West Ltd	Steffan Jones	DNO	Negative	Positive	Positive	Positive	Negative	Negative	Positive	Positive	Positive	Positive	Positive	

Summaries				Respondent agrees with the proposal that these are not defined in detail within CUSC but they cannot see a way of delivering CMP435 without the Gate 2 Criteria or CNDM processes being defined / structured. Would like the comfort of clarification that we would be able to raise a modification request on these methodologies if it were deemed necessary. They feel the governance for this process needs to be clearly prescribed.	Respondent does overall support the proposal that these are not defined in detail within CUSC but they cannot see a way of delivering CMP435 without the Gate 2 Criteria or CNDM processes being defined / structured. Would like the comfort of clarification that we would be able to raise a modification request on these methodologies if it were deemed necessary. They feel the governance for this process needs to be clearly prescribed.	Respondent does overall support the proposal, but they believe that this element would be better delivered by having a long stop date period defined as being from the Acceptance of a Gate 1 offer to the submission of a compliant Gate 2 application.	Respondent does not believe this is required nor that it constitutes MVP and the same outcome can be used through the existing derogation process.	Respondent believes criteria needs to be strong enough to clear a sufficient portion of the pipeline. States that the wording of the section not clear or robust i.e. The exemption is intended to be for the duration of the option only and not for the option itself. Suggests that the achieving of M1 milestone (or M2, M4 etc) does not exempt Gate 2 or the requirement for an option, just the minimum duration of the option, asks for clarity.	Respondent supports the proposal but still do not agree with the restriction of only one generator being allocated to one area of land. Respondent suggests that a stronger, more defined process for sample checks is required, along with an understanding of the potential time impact if this is required on a significant proportion of schemes, especially in the Small and Medium embedded sector (as there tends to be a higher volume of these).	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	
38	Muir Mhor Offshore Wind Farm	Helen Snodin	Generator	Positive	Positive	Positive	Positive	Positive	Positive	Negative	Positive	Neutral	Neutral	
Summaries				Respondent understands concerns of those who want to see some of these methodologies codified. Thinks on balance that this will be too time-consuming and limit the ability for the methodologies to evolve. However, is strongly supportive of transparency of the methodologies, as well as a consultation and approval process, with potential for codification at a later stage.	No comments to summarise	Respondent is supportive of the connection point reservation, but strong concerns about the proposals to reserve capacity and associated queue position.	No comments to summarise	Respondent is supportive of the principle but conditional on the detail of the associated methodology / guidance.	No comments to summarise	Respondent is supportive of the general approach of self declaration and sample checks. However, it is baffling why ESO has not investigated a 100%-cover digital check on duplicate / overlapping RLIs.	Respondent feels that if this is allowing a new project after Gate 2 and if Gate 1 is optional, then hard to see why this would be allowed. Suggests the proposal is reliant on Gate 1 providing connection points that largely do not change, and this is a dangerous assumption that could backfire.	No comments to summarise	No comments to summarise	Respondent feels that Element 20 as well as transition methodologies codified further discussion to aid clarity.
39	Energiekontor UK Ltd	Cameron Gall	Generator	Negative	Neutral	Neutral	Positive	Negative	Negative	Positive	Negative	Negative	Neutral	
Summaries				Respondent states the Proposer envisages only high-level concepts being codified, with Guidance and Methodologies setting out the detail. Suggests that there needs to be some ability for industry to raise new and/or comment on proposed changes to Guidance or Methodologies, especially if the current Gate 2 criteria do not achieve the desired effect.	No comments to summarise	No comments to summarise	Respondent agrees with 3 year longstop date.	Respondent is concerned that queue acceleration for designated projects creates an uneven playing field.	Respondent feels it is not clear how queue positions will be determined for the Gate 2 to Whole Queue process, or that this process will achieve "first ready, first connected".	Respondent feels the assessment should include evidence for having met M1 and/or M2.	No comments to summarise	Respondent feels there needs to be the ability for industry to raise and/or comment on proposed Guidance and Methodologies.	Respondent states that the method for re-ordering projects that request Advancement having met Gate 2 by 31st January 2025 is not clear. Suggests that the Gate 2 to Whole Queue process should facilitate "first ready, first connected".	No comments to summarise
40	Ocean Winds	Nina Brundage	Generator	Negative	Positive	Positive	Positive	Positive	Negative	Negative	Positive	Negative	Positive	Neutral
Summaries				Respondent feels gate 2 criteria will have such an impact they should be subject to CUSC governance	Respondent feels that the proposed solution does not make it clear how an offshore wind farm developer can submit a Gate 1 application	Respondent is positive on the basis the proposed LoA equivalent is an acceptable solution, but concerned this element does not seem to consider any way for the Crown Estate to request provisions for future offshore leasing rounds under Gate 1	No test	Respondent feels that the Project Designation Methodology has not been written and consulted upon which impacts their ability to comment upon	Respondent feels there is insufficient detail provided in the Workgroup consultation to allow them to comment on the potential impact of the proposed changes on offshore wind farm development, and has commented on the lack of timescales.	Respondent feels that the criteria listed in the consultation document is onshore-focused and that ESO should be undertaking duplication checks	No comments to summarise	Respondent feels elements of the Connections Network Design Methodology will have such an impact they should be codified and subject to CUSC governance	Respondent feels timescales for updated Gate 2 offers places uncertainty on users	Respondent is neutral due to lack of clarity over whether cut over arrangements apply to post-HND/HDFUE AIVs
41	Energy UK	Tobias Burke	Industry Body	N/A	N/A	Positive	Positive	Positive	Positive	Positive	Negative	N/A	N/A	Positive
Summaries				Respondent broadly agrees with proposal of methodologies and guidance but believes codification of gate processes is required more than guidance, as investment requires legal certainty given the net zero delivery targets. However, acknowledged the flexibility required given element 14. Highlights lack of time between Ofgem approval of Gate 2 criteria methodology and CNDM and go live date for industry to provide input. Uncertainty remains until the approval of these.	Respondent broadly agrees. Highlights for awareness that it has been proposed through the Transmission Charging Reform workstream that a modification is brought to the CUSC committee to allow embedded generators to access as a party and remove the need for a BELLA. ESO should therefore be aware of the potential impact of in scope projects.	Respondent broadly agrees with primary process regarding coverage for existing background projects. Concerns around the proposal, particularly small developers, to obtain land rights by the January deadline. Believes it is critical there is a level playing field for offshore connecting parties which are already in the connection queue.	Respondent is supportive of the long stop date for existing projects. However, they believe there is significant risk of legal challenges, risking termination of a developer's connection agreement. Respondent proposes ESO investigates long term arrangements to avoid legal risk.	Respondent cautiously supports this proposal, on the basis it has potential to accelerate connection of essential projects. Concerned about the misuse of this policy and future use. Suggests clear codified guidance and recourse route is required, would mitigate concerns ESO is using this to pick winners in the queue.	The respondent recognises the rationale behind the ESO's decision to only apply CMP434 requirements from Authority Decision date to existing contracted projects. Concerned that the results of the Call for Input requires serious consideration as to the legal implications for existing contracted projects. Suggests the legal challenge risk is very real and could threaten the connection reform process.	The respondent understand the proposal to rely on sample checks but has some concerns this will lessen the burden to ensure all evidence is correctly submitted. Suggests clear guidance backed by code modifications is required. Appreciates the intention to check 100% of red line boundary land right submissions.	The respondent deems this element unnecessary. The respondent acknowledges the efforts to avoid gaming risk in the proposal but feels it implemented caution is required with regards to the use of the 12 month location change allowance.	The respondent overall supports the mechanism as a method to better coordinate network design. Noted significant uncertainty remains for investment decisions until the CNDM and Gate 2 Criteria Methodology is created and approved. The respondent urges ESO to be clear in communication/signalling, involve industry if intending to utilise this and codify as much as the CNDM as possible. Stressed the need for the inter-clip conditions of a proposed connection to be reassessed when queue positions are rearranged and that the impact of this reassessment on queue position codified.	The respondent supports the changes in principle regarding the treatment of projects, if they have not met Gate 2 requirements by 31 January 2025. Respondent requests for greater transparency regarding transitional contractual changes moving forwards. Respondent has serious concerns regarding legitimate securities and liabilities for projects not able to meet Gate 2 requirements by the 31 January 2025. Believes this presents risk that could cause legal challenges. However, notes that the cut over arrangements for project progressions, BEGAs and BELLA are not yet defined	The respondent broadly agrees with this proposal, but believes further clarity needed on treatment of securities and liabilities for projects applying during the cut over period.
42	Scottish Renewables	Stephen McKellar	Industry Body	Negative	Negative	Negative	Neutral	Negative	Negative	Negative	Positive	Negative	Negative	Neutral
Summaries				Respondent is concerned about the definition of Methodology. Concerned about not codifying methodologies. Respondent also feels the extent of the Methodology documentation is limited.	Respondent questions the exclusion of embedded demand in its entirety.	Agrees that alternative arrangements are needed to facilitate Offshore Projects. Concerns around the proposal, overcomplicating the process and negatively impacting the wider market. Concerned that the proposed Q1 2025 implementation potentially conflicts with the principle of fair and equitable treatment of embedded customers if related DNO initiatives are not introduced within the same timeframe.	Agreed that some bar to entry at Gate 1 is sensible however concerns re: the inclusion of a Longstop Date.	Respondent believes inclusion of Project Designation in some form will mitigate certain unintended and potentially unforeseen impacts on pan-ener User groups in the future, others recommend removing as part of the MVP and instead progress under a separate code modification once there is a greater Strategic Spatial Energy Plan definition.	Respondent feels there are too many challenges to provide overall support as proposed, including: Planning milestones, out in time to Gate 2 Planning Criteria, TEC or Installed capacity, Red Line Boundary Changes to Gate 1 to Gate 2, Land Option Term, Outline Planning and TO uncertainty clauses in TCDOs.	Respondent cannot agree with the element as drafted due to the Gate 2 criteria evidence assessment to be self-certified at Gate 2 is different from the preferred / requested location within the Gate 2 application.	Respondent feels it is possible to alter the site location within the 12 months following Gate 2 offer acceptance, but only if the connection point offered / contracted at Gate 2 is different from the preferred / requested location within the Gate 2 application.	Respondent states it is unclear from the proposal how proposed implementation can succeed without a BELLA or BEGA will need to liaise with the DNO. Concerned when the queue is reordered for the first time, if embedded customers are disadvantaged through the reliance on several BAU processes that are not in new world. Suggests that there is a concern across a number of members that the impact will be enduring as the initial reordering will set the new baseline.	Respondent is concerned that embedded projects without a BELLA or BEGA will need to liaise with the DNO. Concerned when the queue is reordered for the first time, if embedded customers are disadvantaged through the reliance on several BAU processes that are not in new world. Suggests that there is a concern across a number of members that the impact will be enduring as the initial reordering will set the new baseline.	Respondent agrees with the need for a "cut over" period (noting the difference from the transitional period), the proposed timeframe is believed to be appropriate for developers, Proposer and the Authority.
43	NGED	Sarah Kenny-Levick	DNO	Positive	Positive	Positive	Positive	Positive	Negative	Negative	Negative	Positive	Positive	Positive
Summaries				Agrees, but may be necessary that after a trial period, the methodologies are codified. Suggest network companies to propose changes to the methodologies, rather than just Ofgem.	Agrees, but it may be necessary that the future, embedded demand is also included in the criteria	Agree a different process for obtaining land rights is sustainable. Everything other than obtaining land rights should be the same for all projects throughout the process.	Suggest a long stop date should be a maximum of 18 months.	Respondent understands the need for a clearly defined methodology without exceptions. Suggests expanding the scope of a section to allow DNOs/DSOs to nominate distributed generation schemes for acceleration.	Respondent's main points are that forward-looking milestones could lead to more bureaucracy and delays, suggesting that milestones should be flexible and aligned with proposed connection dates. Proposes aligning the allowable change process at the DNO level to the process at the transmission level. Suggests that customers who do not meet the gate 2 criteria should automatically be considered as a new application.	Believes Self-certification of the Gate 2 criteria represents a risk to the whole process and weakens the proposal. Advises the ESO needs to provide clear guidance for each part of the process.	Believe this adds further complications to the process and could create challenges for projects progressing within the queue.	Support the CNDM methodology and the proposal for it to not be codified. Suggests that after a trial period, it may be optimal for industry frameworks if some elements are codified	Support the changes to customer agreements. However, changes to DNO Agreements will also be needed	Support the need for a cut over period. However, notes that the cut over arrangements for project progressions, BEGAs and BELLA are not yet defined
44	Itb Vogt	Jingling Sun	Generator	Positive	Positive	Positive	Positive	Negative	Positive	Positive	Positive	Positive	Positive	Positive
Summaries				Believes this provides a good balance of flexibility and governance, allowing the connections process to adapt to changes in the energy market. Suggests that the light codification in the ESO's transmission licence ensures that the high-level concepts are maintained while allowing for detailed methodologies to be developed and updated as needed.	Believes that clarifying which projects need to go through the Gate 2 to Whole Queue Process ensures transparency and fairness.	No comments to summarise	Believes the introduction of a longstop date of three years from the acceptance of the Gate 1 offer strikes a necessary balance between providing adequate time for developers to progress and ensuring that projects do not stagnate in the connection queue. Suggests that the discretion for extending this period is a sensible approach, allowing for flexibility in cases where developers are actively progressing but might face delays due to factors beyond their control.	Believes that while prioritizing critical projects is important, the concept of Project Designation could potentially disadvantage other legitimate projects and create issues with fairness in the queue. Advises that the lack of a clear dispute resolution process and the potential for designation criteria to impact system constraints are also concerning. Suggests alternative approaches should be considered to ensure a more equitable system.	Agrees this has been achieved but believes that the implementation could be enhanced by including more detailed information on sample checks rather than full verification may impact the robustness of the process and feels that it is crucial that the minimum percentage applications to be sample-checked is defined clearly to maintain consistency and reliability.	Agrees that the self-declaration approach is a reasonable method for managing the Gate 2 criteria, but believes that the reliance on sample checks rather than full verification may impact the robustness of the process and feels that it is crucial that the minimum percentage applications to be sample-checked is defined clearly to maintain consistency and reliability.	Believes allowing developers to change their project site location within a 12-month period provides flexibility and help address connection point issues. Suggests that there should be more stringent measures to prevent misuse and ensure that the process is transparent e.g. detailed checks and balances could be introduced to avoid potential gaming of the system.	Generally agrees with this and that the CNDM's framework for capacity management is promising, but the lack of codification for the reallocation mechanism could lead to uncertainty. Advises that clear, codified rules would ensure fair implementation.	Agrees with the approach of categorizing existing projects into four distinct groups and adjusting their progression based on these categories. As it ensures that projects meeting Gate 2 criteria are appropriately transitioned or modified to meet their existing agreements as needed. The Respondent had a question on whether the distribution projects that have gone through project progression will be offered the same opportunities to self-declare that they meet Gate 2 criteria at the start of the connection reform?	Supports the idea of a cutover period to manage the transition effectively. However, notes that the cut over arrangements for project progressions, BEGAs and BELLA are not yet defined
45	Renewable UK	Barnaby Wharton	Industry body	Negative	Negative	Negative	Neutral	Negative	Negative	Negative	Positive	Negative	Negative	Neutral
Summaries (18 pages)				Believes the present level of "Methodology" definition is very limited. The respondent's concerns include the need for visibility and accessibility of key documentation and underlying principles and the potential impact of codifying only the Considerable Impact Criteria. Strongly requests for open consultations on critical documents and a concern about the limited extent of "Methodology" documentation. Suggests that the absence of essential high-impact documents from the list is highlighted.	Broadly agrees with what goes through the Primary Process, but have questions about completely excluding embedded demand. Raises concerns about potential consequences when new demand triggers transmission works. Advises that there is inconsistency in the classification of 132kV across GB, addressing these concerns is crucial. While expected to be managed through CMP438, there is a potential gap for direct connected projects that trigger works on the DNO networks under CMP434 and CMP435	Suggests that alternative arrangements are needed to facilitate Offshore Projects and highlights the need for a mechanism for the Crown Estate to request provision for future offshore leasing rounds. Expresses concerns about the proposed concept of the Gate 1 offer and its potential unintended consequences for various aspects of offshore wind projects, existing contracts, long-lead projects, and embedded projects. The respondent also emphasizes the importance of fair and equitable treatment of embedded customers and raises several points for consideration and queries related to integration with existing and proposed DNO approaches.	Respondent concerned about the perceived value of Gate 1 and concerns about the impact of reclassification. Shows reservations about tying the Longstop date to the acceptance of Gate 2 offers, as it may compel users to accept sub-optimal or disputed offers. Concerns related to the proposed Longstop Date and its potential unintended consequences for various aspects of offshore wind projects, existing contracts, long-lead projects, and embedded projects. The respondent also emphasizes the importance of fair and equitable treatment of embedded customers and raises several points for consideration and queries related to integration with existing and proposed DNO approaches.	Respondent understands concept, but do not support in present form and concerned with Project Designation being defined through an associated non-codified "Methodology". Suggests the phrase "Materially reduce system or network constraints" is causing concerns and requires clarification on its meaning and legal authority for implementation. Advises that the future methodology should consider the potential for gaming and the influence of short-term political drivers on the queue. Recommends that the impact of gaming and political drivers be modelled to understand their influence. Believes a provision allowing projects to move straight to Gate 2 if they meet specific criteria and are time-critical, and questions why this provision couldn't be extended to all users.	The respondent states that several aspects are generally supported but is concerned regarding the approach for projects with connection dates far into the future and the potential risks it may pose. Highlights the importance of aligning timescales for onshore developments in Scotland and England, along with the need for comprehensive planning types and timescales review. Suggests to consider exception clauses for certain projects, as well as concerns about the terminology and proposed 50% rule regarding the red line boundary. Highlights the impact of these rules on emerging technologies particularly in cases where a hard limit could make a project uneconomic. Advises that re-application for a percentage of TEC at the next Gate 1 window is not necessarily efficient for any party. Concerns about the "first ready, first served" principle and the potential impact on projects waiting for planning permissions. Stresses the discrepancy between TEC and Installed Capacity. Advises on the Red Line Boundary Changes from Gate 1 to Gate 2 and the potential risks to developers. Advises Land Option Term needs for legal clarity. Suggests the possibility of Outline Planning as an option for users. Uncertainty clauses in TO Connection Offers and the need for their removal to increase investor confidence.	Respondent wants a clear definition of the level of auditing required for self-certification and rules for dealing with false claims. Emphasises the importance of efficient internal and inter-network systems and processes to avoid projects missing entry to the next Gate 2 assessment. Advises that the future methodology should consider the potential for gaming and the influence of short-term political drivers on the queue. Recommends that the impact of gaming and political drivers be modelled to understand their influence. Believes a provision allowing projects to move straight to Gate 2 if they meet specific criteria and are time-critical, and questions why this provision couldn't be extended to all users.	Believes it is possible to alter the site location within the 12 months following Gate 2 offer acceptance, but only if the connection point offered / contracted at Gate 2 is different from the preferred / requested location within the Gate 2 application. Advises the proposed changes include informing the ESO about site location changes within a defined timescale, extending offer validity if the ESO fails to deliver, and including clauses within all offers with a timescale for customers to exact them. Questions about the timeframe and exceptions for non-net criteria. Concerns about connection point change involves cases where the location changes or was unavailable at the time of application submission and legal test should account for this. Suggested reviewing exceptions for the 12 month baseline if criteria not met.	The respondent is generally in favour of the concept of a CNDM, but cannot support Element 16 as the CNDM and Interactivity Guidance are not available for review as part of this consultation. Suggests the introduction of the proposed CNDM would likely require updates to the Interactivity Guidance Policy by the ESO to reflect changes in capacity allocation. Therefore, a different interactivity policy would need to be developed to align with the proposed CNDM.	Respondent concerned that embedded projects without a BELLA or BEGA will need to liaise directly with the DNO. Suggests this may lead to reliance on BAU processes and potential risks due to differing approaches by DNOs or Licence Areas. Advises small and medium embedded projects are perceived to be at a notable risk during the initial implementation phase triggered by the cut-over arrangements. Suggests possible excessive administrative burden placed onto the ESO, and question the TO's ability to effectively undertake all modelling immediately following implementation. Currently there is no apparent active risk management.	
46	SSEN Distribution	Michelle MacDonald Sandison	Distribution Network	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Negative	Positive	Positive	Positive
Summaries				Respondent feels high-level concepts need to be codified with additional detail being held outside of the CUSC, including the governance process associated with the change to methodologies and guidance.	Respondent supportive of fixing the retrospective queue however are concerned about small and medium embedded users if DFTC is not codified. Concerned about Embedded demand not being included in the scope for TMO4+ process.	Respondent agrees.	Respondent supportive of introducing back stop dates into Gate 1 Agreements, however has concerns that 3 years is too long for the longstop date and without the presence of a financial instrument at the Gate 1 stage there is a lack of incentive for projects to adequately progress.	Respondent supportive of the introduction of Project Designation, however as noted on Element 6 of this paper, is imperative that there is a clear governance and control in place to ensure ESO are not placed in a position of power where only projects that are of interest to ESO are progressed.	Respondent overall supportive of the criteria to demonstrate Gate 2 requirement compliance, however don't believe Gate 2 goes far enough. Believes there should be allowance beyond the statement of HND and interconnectors, and to the proposal needs to be mindful of future government led initiatives or policies, such as CP2030	Respondent supports however has concerns that the information required to achieve Gate 2 is very low.	Respondent has concerns around the proposal that developers will be able to move their project site location closer to a connection point offers at Gate 2.	Respondent supports this element, but it must be made clear within the methodology how this will work for distribution customers	Respondent is supportive however believes there is a significant risk of legal challenge with this proposal due to the insufficient time being given to customers to notify them of the changing of requirements, changes to their contract, and the conclusion and publication of the new code of legal test, especially with the change to DNO contracts which are not a CUSC governed contract. Respondent suggests a cool off period.	Supportive of principles however respondent does not support the implementation plan and therefore cannot support the cut over arrangements beginning on the 7th of August 2024.
47	RWE Renewables & RWE Supply & Trading	Claire Hynes & Tim Ellingham	Generator	Negative	Positive	Positive	Positive	Negative	Positive	Positive	Negative	Positive	Positive	Positive

Summaries				The respondent feels the Methodology and Guidance should be codified. Suggests that if not codified creates risk and cost and gives too much power to NESO. Advises that will possibly raise mod to codify these methodologies to CUSC. Respondent want further opportunity to consult on the detail of the methodologies and guidance in the Code Admin Consultation.	Respondent positive in supporting scope of projects from Gate 2 to whole queue	Respondent recognises the differences in application of primary process for customer types. Respondent recommends working closely with colleagues on Celtic Sea project to ensure consistency of messaging.	Agrees with proposal for longstop date of 3 years from gate 1. Respondent notes we need to be mindful of offshore wind projects or similar as they have challenges from Crown Estate with Agreements for Lease and therefore need more flexibility with longstop dates. Respondent notes Longstop dates could create scenarios where landowners have additional bargaining tools regarding the longstop date and deliberately stalling the process/increasing prices and raising costs.	Respondent considers the new definitions to open to interpretation and need to be tighter and more granular.	Respondent agrees that the proposed application of Gate 2 Criteria to projects already able to demonstrate meeting queue milestones is a good idea as long as developers are ready to load leasestones to Connect Now Portal ahead of approval of this change in line with CMP376. Respondent has asked ESO to give update on varying (abv) contracts to introduce queue milestones. Respondent has asked that connection queue milestone 1 should be retained but calculated backwards from Construction completed date rather than forwards from Contract Acceptance. (Reasons given in response). Respondent doesn't see benefit in separating out the timescales for the different planning regimes as the timescales also differ by technology. Respondent notes that submission of planning consents too early risks cost and environmental impacts if technologies change and improve. Respondent thinks ESO might have a misunderstanding of Development Life Cycle of a project.	Respondent supportive of Gate 2 criteria subject to Planning Consent milestone 1 being calculated backwards not forwards.	Respondent thinks ESO should offer a connection location site suitable to the project as opportunities to find alternate connections may not be possible within a 12 month period especially for onshore wind.	Respondent supportive of the development of CNDM but notes it should be under CUSC not a Transmission Licence (see Element 1).	Respondent noted the new contractual changes	Respondent notes the process set out in CMP435. Respondent requests ESO to give indication of the final transition process as soon as possible.	
48	Bute Energy Ltd	Douglas Allan	Generator	Positive	Positive	Positive	Negative	Positive	Negative	Positive	Negative	Positive	Positive	Positive	Positive
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	Suggest that the current User Progression Milestone M1 date (Secure Land Rights) be used as the date by which the User has to demonstrate compliance with the Gate 2 criteria.	No comments to summarise	Believes that typical planning timelines are not representative of the time required to develop projects and given the expenses involved, it is not reasonable for developers to carry out studies ahead of a Gate 2 offer. Agrees in principle that M1 is calculated forwards, but the length of time should be technology specific or left to the ESO's discretion on a case-by-case basis to avoid discrimination against generating technologies that need longer than the period set out in the Proposal.	No comments to summarise	Believes that from an onshore wind farm perspective, moving the site closer to an alternative point of connection makes no sense as onshore wind projects need to be situated at a location with suitable wind resource. Also the time, money and effort spent in gaining option agreements with landowners (a requirement to get a gate 2 offer in the first place) becomes redundant and a development is sent back to square one. The Respondent therefore believes this Element favours developments which are less reliant on local conditions (e.g. BESS) and disadvantages projects that cannot easily be relocated (e.g. Solar or Onshore wind).	But believes that further detail on what the CNDM entails is required.	No comments to summarise	No comments to summarise	
49	Green Generation Energy Networks Cymru Ltd	Daryn Lucas	Distribution Network Operator	Positive	Positive	Positive	Negative	Positive	Negative	Positive	Positive	Positive	Positive	Positive	Positive
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	The Respondent is concerned about the proposed obligation on DNOs/Transmission connected IDNOs to terminate customer agreements following a specified period of time. Suggests a provision could be introduced for new customer contracts but for existing Distribution customers, introducing retrospective termination rights will be legally and commercially challenging. The Respondent suggested that it would be better to use the Distribution equivalent of the CUSC User Progression Milestone M1 date (Secure Land Rights) introduced by CMP376, as the date by which customers have to demonstrate compliance with the Gate 2 criteria.	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise
50	Research Relay Ltd	Dennis Gowlan	Generator	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Neutral	Neutral
Summaries				No comments to summarise	No comments to summarise	Concerns raised about no requirement for an offshore users to provide an LOA	No comments to summarise	Respondent emphasises importance of transparency	Concerns around planning timescales.	No comments to summarise	No comments to summarise	No comments to summarise	Respondent is concerned about those with BELLA / BEGA contracts, requests clarification	Concerns around the proposed deadlines.	
51	BayWa r.a. UK	Graham Pannell	Generator	Negative	Positive	Negative	Negative	Negative	Negative	Negative	Negative	Positive	Negative	Negative	Positive
Summaries				The respondent believes that proposal lacks key documentation, making it impossible to assess properly. The response suggests reconsideration once the missing documentation drafts are published. Believes that there's uncertainty that makes this proposal worse than baseline.	"Agree"	Respondent believe that the consultation period was too short for meaningful consideration.	The Responded proposes allowing a longer long-stop for pre-existing contracts moved onto Gate 1 with target grid dates far into the future. Argues against using the default 3-year long-stop, stating it won't negatively affect other users or allow gaming. Believes that pre-existing users acted in good faith and provided timeline information, supporting Transmission Operator needs. States that without longer long-stops, users could be unfairly removed from Gate 1 and have to reapply. The Respondent recommends calculating the long-stop as no earlier than the time remaining to original target grid date from the date transitioned to Gate 1] subtracting [3 years], rounded up in whole financial years.	The Respondent argues the need to see a draft of the key documentation to consider this. Believes that the lack of detail will lead to a high risk of undue discrimination to be able to offer support.	The respondent broadly agrees with the proposal and has no objection to the land requirements proposal. Suggests that the M1 milestone should only be set forward-looking if it aligns practically with the grid connection date. Believes that the M1 deadline should not force development to progress faster than the scheduled grid connection target. The respondent proposes to use the grid connection target to determine the earliest possible M1 date. They provide an example in a table for how this method could work.	The respondent agrees, except that they believe that land rights should be checked with all projects to avoid the process being manipulated and that sampling will be insufficient.	The Respondent currently doesn't object, but notes the lack of time to provide meaningful consideration.	The respondent requests to see a draft of the proposal and expresses concerns about the potential for undue discrimination. Suggests that codification may be necessary to ensure open governance and accountability. The Respondent is open to being convinced otherwise. The respondent agrees that it is logical to amend iteratively processes.	The respondent suggests that the additional fee for Transitional offers should only apply if the original application fee has been reconciled and refunded for unused spend. Recommends a fee reconciliation process for the first group transitioned onto Gate 1 to account for any unspent application fees.	Broadly agree	
52	Xlinks Morocco UK Power Project (MUPP)	John Greasley	Generator	Positive	Negative	Negative	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Neutral	Neutral
Summaries				Respondent states subject to full transparency, consultation and Authority approval	Respondent feels there should alternative arrangements for offshore/mega projects outside of the UK and its territorial waters	Respondent feels there should alternative arrangements for offshore/mega projects outside of the UK and its territorial waters	No text	Respondent feels any methodology for project designation must be transparent, fully consulted upon and approved by the Authority	Respondent feels there should alternative arrangements for offshore/mega projects outside of the UK and its territorial waters	Respondent feels there should alternative arrangements for offshore/mega projects outside of the UK and its territorial waters	Respondent feels there should alternative arrangements for offshore/mega projects outside of the UK and its territorial waters	Respondent feels the Connections Network Design Methodology must be transparent, fully consulted upon and approved by the Authority	No text	No text	
53	Community Energy Scotland	Eibhlín Nequoy	Generator	Positive	Negative	Positive	Negative	Negative	Negative	Positive	Negative	Positive	Positive	Positive	Negative
Summaries				No comments to summarise	Concerns surrounding the addition of administration that would need to take place, especially for small and medium embedded users.	Respondent feels the main text should clarify whether Large embedded generators expected to apply to the ESO for a connection.	Respondent states the longstop date could provide challenges for Community Generators.	Respondent suggests the addition of another project designation for community generators.	Respondent feels the timescales given are too short for securing planning consent.	Respondent feels if sample checks being undertaken by the DNO or ESO take longer than expected, the application should not be withheld from the Gate 2 design process.	Respondent states it is unclear why the offered connection point would differ to the requested connection point at a Gate 2 application.	Respondent agrees subject to the Authority having the methodology in place.	Responded agrees only if the Gate 1 output includes an indication of cost, which is then passed onto Small and Medium Embedded Generators.	Respondent has concerns about the proposed timescale, stating that the Cutover period is particularly tight.	
54	Field	Andy Ho	Storage	N/A	N/A	N/A	N/A	N/A	Negative	N/A	N/A	N/A	N/A	N/A	N/A
Summaries				N/A	N/A	N/A	N/A	N/A	The Respondent believes there should be more stringent requirement to reach Gate 2 and that having Land rights is insufficient a hurdle to help NGEsO and TOs to rationalise the queue. The Respondent suggested 1 of 2 additions to Gate 2 criteria: 1- Planning Consent application submitted (proof of submission) 2- A minimum financial outlay on planning related activities to date Or alternatively, the Respondent suggested that a 'Ready to Submit Planning Consents Application' or an equivalent criteria be included in gate 2 criteria, but acknowledged this would be fairly difficult in terms of resourcing (checking all planning docs of all projects).	N/A	N/A	N/A	N/A	N/A	N/A
55	SP Energy Networks	Gareth Williams	Distribution Network Operator	Positive	Positive	Positive	Positive	Positive	Negative	Positive	Positive	Positive	Positive	Positive	Positive
Summaries				Respondent agrees that the 3 methodologies should sit outside of the CUSC and be approved by the Authority.	Respondent agrees with the groups of customers to go through the Primary Process	Respondent agrees that The Crown Estate and Crown Estate Scotland will play an important role in acknowledging the progression of offshore projects.	Respondent supports the introduction of a longstop date however feels the 3 year limit may cause project to progress too quickly to Gate 2 leading to unintended consequences.	Respondent is supportive of the introduction of the Project Designation Methodology based on our experience of previous Pathfinder competitions	Respondent feels as though the Gate 2 criteria is set too low.	Respondent emphasises that flexibility regarding project site location will be crucial for optimal network utilisation, particularly following the 'Gate 2 to the Whole Queue' exercise.	Respondent is supportive of the CNDM and agrees that the ESO's licence would be amended to include the CNDM, however, would not expect the TO's licenses to be updated accordingly too.	Respondent states clarity is needed re: provision of securities to planned Transmission works.	Respondent agrees however would encourage the proposer to consider an earlier date than the 10 days		
56	OnPath Energy Limited inc Kype Muir Wind Farm	Dan Thomas	Generator	N/A	Negative	N/A	N/A	N/A	Positive	N/A	N/A	N/A	N/A	N/A	N/A
Summaries				No comments to summarise	Believe that the key interface management requirements with DNOs have not been adequately developed or tested.	No comments to summarise	No comments to summarise	No comments to summarise	Respondent emphasises the importance of robust gate 2 requirements to only support projects that are more likely to progress and achieve the objectives of the change.	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise
57	Low Carbon	Ed Birkett	Generator	N/A	Positive	Negative	Positive	Negative	Positive	Negative	Negative	N/A	Negative	Negative	Positive
Summaries				The Respondent does not believe that this Element is part of the proposal for CMP435, only CMP434. Doesn't believe it would be practical to introduce differences to the level of codification for CMP434 and CMP435.	Respondent believes for fairness, that Embedded Demand is included in the scope of this proposal. However, given that Embedded Demand is out of scope of CMP434, it makes sense that it is out of scope for CMP435.	Respondent believes that this could create difficulties for interconnector Users, as they may not be able to meet the Gate 2 Criteria by the end of the year through no fault of their own. Respondent also highlights that the proposed Gate 1 Criteria for interconnectors is a letter from CECEs, but it is not clear whether CECEs has agreed to provide these letters or what criteria they will apply, therefore the Gate 1 Criteria should not be applied to existing interconnector Users.	See response to CMP434.	See response to CMP434. Respondent does not support this Element being used as part of the Gate 2 to Whole Queue process.	Respondent supports removing the minimum option length for options signed before a certain date. However, to prevent gaming, believes that this date should be earlier than the Authority Decision Date, else developers are likely to sign very short option agreements to meet the Gate 2 Criteria and to retain their queue position, which risks undermining this proposal.	Respondent suggested the following assessment process for evidence submitted as part of the Gate 2 to Whole Queue process: -Developers must submit evidence of secured land rights, a self-declaration letter, and a project Red Line Boundary – as per the proposal. -For determining which contracted offers are accepted into the Network Design Exercise as part of the Gate 2 to Whole Queue process, the ESO will only check the self-declaration letter and the Red Line Boundaries – the ESO will check 100% of these. -While the new offers are being processed, the ESO will check 100% of the underlying documentation. If the evidence is found to be non-compliant, then the contracted offers would be removed from the Network Design Exercise, and would be converted to Gate 1	See response to CMP434 - Respondent does not see any merit in the Element.	Respondent does not believe that this is part of the CMP435 proposal.	Group 1 – See comments in response to Question 1. Group 2 – Respondent supports the approach of handling via ATV, but suggests that, for these projects, ESO should still reassess the Outage Conditions (ConsAg Appendix D) and Interrups (ConsAg Appendix F) to see if these can be made more favourable due to queue attrition. Group 3 – Respondent agrees with the general approach of handling these changes via a Mod App. But does not agree that all projects seeking advancement should be required to pay a Mod App fee at the point of entry into Gate 2. Respondent suggest the following approach instead: -Ask developers to express interest in advancement via an Expression of Interest (in line with the approach taken as part of the Transmission Works Review).	No comments to summarise	
58	National Grid Electricity Transmission	Richard Woodward	Transmission Owner	Negative	Negative	Negative	Positive	Negative	Positive	Positive	Positive	Negative	Positive	Positive	Neutral
Summaries				Respondent does not believe these methodologies, or their governance, are a matter for CMP435.	Respondent suggests wording be changed to reflect only consideration of legitimate differences for the Primary Process.	No comments to summarise	Respondent agrees, requests clarification for fair treatment of existing users.	No comments to summarise	No comments to summarise	Respondent agrees but emphasises that the ESO should be transparent on managing reasonable expectations to Users on this process.	Respondent supports but feels the solution could better define for those in receipt of a transitional offer.	Respondent agrees however believes expectations on advancement re: group 3 need to be much better managed.	Respondent suggests proposer elaborates on how cutover arrangements will be facilitated.		
59	Scottish Hydro Electric Transmission plc	Greg Stevenson	Transmission Owner	Positive	Positive	Positive	Positive	Positive	Positive	Negative	Positive	Positive	Positive	Positive	Positive

Summaries					No comments to summarise	No comments to summarise	Agree with the removal of an Offshore Letter of Authority in these circumstances. Ask ESO to confirm that the same treatment applies in respect of onshore customers.	Agree with the proposal for the ESO and DNOs to include Longstop dates, once relevant projects have moved to a Gate 1 offer	Respondent would like to understand ESO's plans for Project Designation in the context of Gate 2 to Whole Queue.	Believe the addition of a technology-specific element would enhance the criteria. Concerns about the impact of applying a requirement from the decision date rather than the implementation date on customers as it gives no time to communicate this requirement to customers and no time for customers to become compliant.	Highlights the importance of ESO/DNO/DNOs validating the signatories of Self-Certifications. In regards to conducting Land Registry checks, there is a preference for 100% submission checks. If not possible, then urge to consider how to maximise the volume of checks and to share approach and rationale. Questions whether this is the appropriate route given that these requests will be treated as modification applications, and believes using the existing process is more appropriate. Concerns about the timing for customer communication post-Olgem decision, with a preference for definite messages to customers after the decision and before the implementation period.	Respondent feels with the proposal to offer this option for customers who have gone through the Transitional Arrangements process and received a Transitional offer. Given the complexities and potential adverse consequences, customers need to be made abundantly clear about what this option means for them	No comments to summarise	Respondent states the proposal specifies that customers with Transitional Offers, akin to Gate 1 offer, will need to submit a modification application and pay the associated fee to enter the Gate 2 to Whole Queue process. Notes that ESO's proposal indicates that customers with existing BAU offers seeking connection date advancement will be "treated as a modification application," but the specification of a fee for these customers is absent. Suggest that these customers should follow the modification application process for advancement, which should include the payment of an associated fee.	Respondent feels there is a potential need to examine customer arrangements in the context of Transmission Owners (TOs) continuing to produce and send full Business as Usual (BAU) offers, and the associated timescales, if the first phase derogation request is not approved by Ofgem.
60	Wind2 Limited	Ian Curry	Generator	Positive	Positive	Positive	Negative	Positive	Negative	Negative	Negative	Positive	Negative	Negative	
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise. Respondent asks ESO to refer to answer given in document [CMP343 and 435 Consultation response Final 20240806.pdf]	No comments to summarise. Respondent asks ESO to refer to answer given in document [CMP343 and 435 Consultation response Final 20240806.pdf]	No comments to summarise. Respondent asks ESO to refer to answer given in document [CMP343 and 435 Consultation response Final 20240806.pdf]	No comments to summarise. Respondent asks ESO to refer to answer given in document [CMP343 and 435 Consultation response Final 20240806.pdf]	No comments to summarise. Respondent asks ESO to refer to answer given in document [CMP343 and 435 Consultation response Final 20240806.pdf]	No comments to summarise	No comments to summarise. Respondent asks ESO to refer to answer given in document [CMP343 and 435 Consultation response Final 20240806.pdf]	No comments to summarise. Respondent asks ESO to refer to answer given in document [CMP343 and 435 Consultation response Final 20240806.pdf]	
61	Buchan Offshore Wind	Craig Duffy	Generator	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	
62	Qualitas Energy	Grant Rogers	Generator	Positive	Positive	Negative	Positive	Negative	Positive	Negative	Negative	Positive	Positive	Positive	
Summaries				Respondent stressed that more time to codify more of the proposals, not just the overarching principles, and time to review and consult on the associated guidance, would be the preference and far more beneficial. However, in light of this option not being available then agreement that the level of proposed codification may be workable.	No comments to summarise	Respondent believes that Offshore Hybrid and Interconnectors require a different approach. If applying for the purposes of generation the process should be aligned and not favour a particular type of connection.	No comments to summarise	Respondent suggested that this Element needed a clear methodology and should be codified. Without doing so will undermine the connection process and also opens a host of questions on fair and equal/unbiased treatment of all Customers.	No comments to summarise	Respondent believes that Self-declaration and sample checking is not enough and that all applicants need to be checked against the same criteria with ongoing compliance being reviewed and checked by the ESO team leading the project. If self-declaration is to be utilised then a follow up check must be carried out on each application claiming adherence to Gate 2.	Respondent fundamentally disagrees with this and has raised an alternative. Respondent believes this pushes the incorrect view of capacity as a commodity instead of projects being the focus. Respondent believes that Element 14 contradicts the concept of adding firmer application requirements within the Proposal and will lead to a host of unwanted outcomes and gaming while adding zero benefit to real development. Respondent suggests this is removed from the Proposal.	Respondent believes that the CNDM should be codified, but agrees with the Proposal that based on the current timescales, the Authority introduces a licence obligation for ESO/TOs to have this proposed Methodology in place, and that the Authority also set out in licence the consultation, governance and approvals process(es) in relation to such a proposed CNDM.	Respondent agrees with this but refers back to Element 13 and highlights again that all self-declarations should be checked/reviewed in full by the ESO, not a selection.	No comments to summarise	
63	eSmart Networks Ltd	eSmart Networks Ltd	Other - ICP and Grid Consultancy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Summaries															
64	Apatara Energy	James Potter	Generator	Negative	Positive	N/A	Yes	Negative	Positive	Neutral	Positive	Negative	Positive	Positive	
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	Respondent suggested a transparent and auditable methodology should be established to define strategically important projects. Recommends this to be codified and auditable to ensure fair and consistent application.	Respondent supports the proposal to work on land and planning tasks simultaneously, which can help expedite the project timeline.	Respondent believes multiple projects can be delivered on the same land parcel and Developers should be consulted to ensure that all projects (transmission and distribution) meet minimum land area requirements and viability criteria.	Respondent believes connection offers with unconfirmed nodal substation locations should have the option to relocate the developer's site with a single modification application after gate 2.	Respondent believes changes should be codified and transparent to customers.	No comments to summarise	No comments to summarise	
65	Talis Energy UK	Florent Leblanc	Storage	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	Believe the Gate 2 criteria may lead to more smaller projects increasing the workload for NGET and ESO. Requiring all land leased at Gate 2 for NSIP projects could make them undeliverable, leading to a surge in smaller projects. NSIP projects must secure at least 51% of the land with a plan for the remaining 49%. Advises Compulsory Acquisition Powers are crucial, and cable routing should not be part of the criteria. Suggests proposed timescales should be reviewed, and access to capital is crucial for developers.	No comments to summarise	Feels the process should be that developers at their 'first choice' substation make their case by providing the evidence of land rights and based on this evidence then spare bays fill up accordingly as Gate 2 offers	Respondent believe the requirements should be codified. Advises the CNDM must not be governed by a guidance document.	Believes there needs to be a provision for the collocation of multiple technologies / development of hybrid energy hubs through a staged connection.	No comments to summarise	
66	Solar Energy UK	Kara Davies	Consumer body	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	
67	The Crown Estate	Chris Gent	Other	N/A	Positive	Positive	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Summaries				Respondent states to see their response to CMP434	No comments to summarise	Respondent states to see their response to CMP434 / CMP434 / Respondent suggests that the longstop period could be longer for offshore projects, 4 years	Respondent states to see their response to CMP434 / Respondent suggests that the longstop period could be 4 years, would give projects adequate time	Respondent states to see their response to CMP434	Respondent states to see their response to CMP434	Respondent states to see their response to CMP434	No comments to summarise	No comments to summarise	Respondent raises concerns about affected parties having enough time & resources to be able to enact process related to final change proposals - encourage ESO & Authority to consider deliverability in final recommendations / Respondent also suggests that ESO should safeguard connection capacities & connection point locations for certain offshore energy projects	Respondent asks that ESO provide case study examples of how final proposals could affect different parties, and what will happen in practice depending on whether Gate 2 evidence or connection agreements are provided / signed by 31st January 2025 or not	
68	Bluefield Development	Jonathan Selwyn	Other	Negative	Negative	Negative	Negative	Negative	N/A	Negative	N/A	Negative	Negative	Negative	
Summaries				Respondent does not agree with CMP434 proposals	No comments to summarise	No comments to summarise	No comments to summarise	Respondent states, based on past experience, they do not have confidence in a fair & transparent process for project acceleration being led by ESO	Respondent states that evidence of exclusivity & a red line boundary should be provided for Gate 1	Respondent states that evidence of exclusivity & a red line boundary should be provided for Gate 1	Respondent raises concern about how the System Operator will treat existing projects & how they will prioritise them through the Gate 2 process - highlights that application dates will not be respected once they enter Gate 2 process, which is unfair, and may lead to legal disputes	No comments to summarise	Respondent states that it is unclear how the released capacity will be allocated between distribution and transmission	Respondent highlight that this introduces significant uncertainty to customers in the existing distribution queues	
69	British Solar Renewables Ltd	Christie Sims	Generator / Storage	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	
Summaries				Respondent believes short turnaround times coupled with the expectation not to include any industry voices makes this impossible to agree with. Moving from 'First Come First Served' is a huge change, and while the overall aims are valuable, the impact can't be investigated without the Gate 2 requirements being clear.	R mostly happy with scope. However raises that DNO projects that are meant to directly connect to GSPs, are at the same level of land disadvantage as transmission connected projects when the new GSP location is unknown. This is made worse for DNO projects as currently changing the red line is disallowed, meaning if the Statement of Works comes back with a new GSP that's 10km away this is the same as killing the project	R believes offshore projects and interconnectors are likely to require a slightly different process from the land based projects.	R satisfied with this element, provided flexibility is allowed due to changes in POC from NGET. In some cases, the POC is going to be 10 miles away from original positioning. Long stop date will be required to prevent everything sitting in Gate 1 forever that isn't viable	R states this could be used as a bias for certain technologies, unhappy being asked for commentary ahead of details of the criteria being published. In theory there is nothing wrong with prioritising nation-critical infrastructure, but it's important that these kind of projects have a high barrier to qualify	R believes the Gate 2 criteria needs close inspection, as it is by this criteria that the whole impact of the scheme will be measured. Too easy to pass and there will be no real change to the connection queue, but requiring planning "blind" without a confirmed connection date will make it very difficult for any developer to progress schemes reliably. Land requirements for "100% of the project" can be open to some argument - needs to provide for flexibility. Requiring the full land for ALL of the technologies involved, rather than just enough technology of at least one type to reach the TEC, takes away any potential betterment of projects of which several are still likely to be in development for 10 years. Not forward-thinking approach.	Respondent thinks the use of self-certification letters does cut down on the admin of both sides of the contract, which is useful. Reservations about the details of the red line.	Respondent believes the ability for TSO projects to change their red line makes sense in terms of their POC changing significantly. However it does create a distortion as large GSP-connected DNO projects are also susceptible to these levels of location change, and they aren't allowed to change their red line at all (beyond NGED's 50% rule, which won't help in this instance)	The announcement of there being a methodology without being clear on that methodology means offering options on this is difficult.	Respondent states that, as a developer with over 90 current projects, how they are handled under the new system is critical to them. Would accepting a gate 2 offer without a requested earlier connection date disqualify the project from the accelerated connections scheme that is currently being run across multiple GSPs?		

Respondent Details				Question 6-9 Summaries			
Response Number	Organisation	Name	Organisation type	Q6 - Are there any elements of the proposed CMP435 solution - as per Q5 - which you believe are not appropriate to include when you consider how to most effectively implement TMO4+ to projects in the existing contracted background (as opposed to the process for new applicants via CMP434)? If yes, please provide supporting justification.	Q7 - In relation to Q6, are there any features which you believe are missing in the proposed CMP435 solution that would more effectively facilitate implementation of TMO4+ to the existing contracted background. If yes, please provide details and justification.	Q8 - Do you believe any groups of projects should be exempt from the scope of CMP435 or from some elements of the proposed solution? If so, please advise on which groups and elements and provide rationale to why.	Q9 - Do you believe that the proposed solution could duly or unduly discriminate against any particular types of projects? If so, do you believe this is justified?
	1 Kona Energy Ltd	Andy Willis	Generator /Storage	Neutral	Neutral	Neutral	Neutral
Summaries				No comment to summarise	No comment to summarise	No comment to summarise	No comment to summarise
	2 Renewable Connections Developments Ltd	Joe Hulyer	Demand / Generator / Storage	Negative	Positive	Negative	Negative
Summaries				No comment to summarise	More details around self certification of gate 2 self certification required	No comment to summarise	No project should be exempt from having the land required to facilitate connection
	3 Sembcorp Energy (UK) Limited	Mark Field	Demand / Generator / Supplier	Negative	Negative	Negative	Positive
Summaries				No comment to summarise	No comment to summarise	Exemptions will undermine process and introduces possibility for discrimination and/or market distortion. Contrary to the point of the Connections Reform, which was to better manage connection queue.	New primary process; different connections for different projects which could be potentially discriminatory.
	4 Ethical Power	Paul Munday	Generator	Negative	Negative	Negative	Negative
Summaries				No comment to summarise	No comment to summarise	No comment to summarise	No comment to summarise
	5 Eclipse Power Networks Limited	Charles Deacon	Distribution Network Operator	Negative	Positive	Negative	Positive
Summaries				Respondent concerned about discriminatory effect of Element 3, and Element 20. Respondent believes Element 1 needs clarification and transparency	Large embedded demand that has a transmission impact must be in scope; as must supply points associated with small/medium generators.	Specific exemptions from the Secretary of State should be available for strategic projects already underway – such as nuclear, interconnectors or gigafactories.	Preferential Treatment for large embedded demand. Discriminates against small and medium generators needing new supply points. Discriminates against Transmission users
	6 Enso Energy	Rob Smith	Generator /Storage	Positive	Negative	Negative	Neutral
Summaries				Element 6 - Project Designation; strong dissent. Does not better meet stated aims. Element has not got enough detail , clarity or oversight. If utilised to bring forward projects at the expense of others to accelerate their connection dates, the ESO will effectively be bestowing a commercial advantage on certain applicants. Not a transparent decision making process.	No comment to summarise	No comment to summarise	No comment to summarise
	7 Centrica	Sam Railton	Generator / Storage / Supplier / Virtual Lead Party	Negative	Negative	Negative	Negative
Summaries				No comment to summarise	No comment to summarise	No groups of projects should be exempt. To exempt projects would undermine Applicable Objectives, and weaken proposals impact of lessening queues.	No comment to summarise
	8 Arise Renewable Energy UK Limited	Daniel Cambridge	Supplier	Positive	Not on response form	Positive	Positive



Summaries				Respondent refers to their letter which shows a strong dissent for Elements 11 and 14 in particular. Respondent is primarily concerned that the proposal will have significant adverse, unfair and detrimental effect on their business and if implemented without adequate consideration and fair transition provisions, would severely impact our business operations, financial stability, and project viability. They find the proposal to be ill thought through. Finally, retrospective changes significantly increase risk as they undermine the principle of legal certainty, which is essential for business planning and investment.	Not on response form	Projects with existing connection agreements which are already demonstrably in compliance with the milestone schedules included in their bilateral connection agreements.	Projects with existing connection agreements which are already demonstrably in compliance with the milestone schedules included in their bilateral connection agreements.
9	Innova Renewables	Joe Colebrook	Generator	Positive	Negative	Negative	Positive
Summaries				Respondent believes that Project Designatin should not be part of the solution.	Respondent does not believe that any elements are missing from the solution.	The respondent does not believe that any projects should be exempt from the scope or elements of the solution.	The respondent notes that offshore wind and interconnectors are given an advantage. The respondent believes that Element 5 will discriminate against technologies competing for the same connection point and capacity which they believe is justified to protect the offshore coordinated design network.
10	Getlink	Alice Varney	Interconnector	Negative	Positive	Negative	Negative
Summaries				No comments	Respondent notes that they believe there are certain edge cases which have not been fully considered and they propose that flexibility is intriduced into the implementation process.	No comments	The respondent believes that there are not any duly or unduly discrimination against technology types.
11	Aquind Limited	Vladimir Temerko	Interconnector	Negative	Negative	Negative	Negative
Summaries				Respondent notes not that they are aware of.	Respondent notes not that they are aware of.	The respondent believes that whilst they do not think that any projects should be exempt, there are elements that need to change to reflect different technologies and planning processes. The respondent references Elements 5, 11 and 8.	The respondent does not believe that any projects should be discriminated against, however states that the current proposal's Gate 2 requirement of securing land rights before DCO application undermines NSIP's statutory rights in progressing planning consent.
12	National Grid ESO	Alice Taylor	System Operator	Negative	Negative	Negative	Negative
Summaries				No comments to summarise	No comments to summarise	Respondent expects those proposed to be within scope as per Element 3	Respondent does not feel the differences in certain circumstances in the process are discriminatory
13	Ørsted	Alex Ikonic	Generator	Positive	Positive	Negative	Positive
Summaries				Respondent notes project designation and gate 2 ongoing compliance should not be included.	The respondent notes several elements that should be included within the solution. First is cost refund/re-allocation, second is signification mod apps as per 434 and lastly is that of the timely publication of pre-app data to improve quality/consistency/granularity.	The respondent does not believe any groups of projects should be exempt entirely but does believe there should be more nuance in how it is applied. They add that blanket rules is more likely to lead to legal challenge. The respondent suggested that providing a buffer for projects to allow them to meet Gate 2 compliance would be better and allowing projects to split out their connection into a staged connection. The respondent also notes that 435 should not be applied to those where the connection date is within 5 years.	The respondent believes that the proposal could unduly discriminate against embedded generators if DNO workstreams are not in place. They listed these as, DCUSA mods, DNO rules on re-ordering the queue, cost re-allocation and process for DNOs to notify ESO of projects reaching Gate 2.
14	Drax	Paul Youngman	Generator/supplier /storage	Positive	Negative	Positive	Positive
Summaries				The respondent does not support element 1 as part of the process and that the contents within element 1 should be codified. The respondent also does not believe that element 10 has sufficient evidence to determine that due discrimination on certain projects is justified. The respondent notes the same for element 9 stating a clear absence of impact assessment and therefore lack of justification.	The respondent believes that each element lacks evidence to suggest there will be a positive impact on the connections queue.	The respondent agrees that all modification applications for existing connected sites should be out of scope of this process.	The respondent believes that the proposals are likely to be discriminatory in their application to different parties however there has been no evidence provided to the work group by the proposer to assess the impact of individual elements. The proposal adds without evidence and analysis it is not possible to assess if discriminatory treatment is material and or justified.

15	Island Green Power	Sam Aitchison	Generator	Negative	Negative	Neutral	Neutral
Summaries				No comments	No comments	No comments	The respondent notes there are several groups of projects discriminated against with DFTEC having the potential to give an unfair advantage to distributed connected projects compared to directly connected ones. The respondent also believes that forward-looking milestone M1 discriminates against smaller developers and that there is undue discrimination against projects that will apply between now and to the go live date.
16	Orrön Energy Development Ltd	Axel Wikner	Generator	Positive	Positive	Negative	Positive
Summaries				No comments	The respondent believes there has to be a transition as outlined in element 11 to ensure a level playing field and to enable maximum possible capacity to connect to the grid.	No comments	The respondent believes it is clear that offshore projects are being prioritised without any clear rationale as to why. They believe the end consumer will benefit from CMP435 being technology agnostic
17	Enfinity Global	Alex Fornal	Generator/Storage	Neutral	Neutral	Neutral	Neutral
Summaries				No comments	No comments	No comments	No comments
18	Commonwealth Asset Management	Peter Rumbold	Demand	N/A	Positive	N/A	N/A
Summaries				No comments	Respondent suggested the Gate 1 criteria include securing land rights or a binding contract for land acquisition within a specific timeframe and a commitment to submit outline planning within a set timeframe. Gate 2 should require the attainment of outline planning permission.	No comments	No comments
19	Flotation Energy Ltd	Calum Watt	Generator	Positive	Positive	Positive	Positive
Summaries				The respondent believes existing projects should be allowed an opportunity to mod app ahead of the 1st of January 25 to resolve any contractual issues without being progressed to gate 1 and gate 2.	The respondent believes existing projects should be allowed an opportunity to mod app ahead of the 1st of January 25 to resolve any contractual issues without being progressed to gate 1 and gate 2.	The respondent believes a small number of projects which are approaching FID who required changes to the contracted position should be allowed to mod app ahead of the implementation date.	The respondent believes the solution will unduly impact projects which are near to securing route to market which would have been able to Mod App on typical timescale.
20	UK Power Networks	Ross Thompson	Distribution Network Operator	Negative	Positive	Negative	Negative
Summaries				No comments	Element 19 - Contractual changes - Mindful of consequential impact of a connection agreement on embedded generator being converted into gate 1 agreement. R states solution will impact accepted distribution customer quotes, so need strong line of sight between the Authority and Government decisions leading to this solution, providing clarity and certainty to impacted customers. R is concerned that the proposed approach is for it to be dealt with outside of the CMP435 solution.	No comments	No comments
21	FRV Powertek Limited	Ravinder Shan	Generator/Storage	Positive	Negative	Negative	Negative
Summaries				Element 14 - R does not see this as aligned with MVP Criteria, or 'First Ready, First Connect'. If POC offered is different, then developer should reapply to Gate 2 at new location. Unfair to hold Gate position for 12 months - might be other projects at new POC who met Gate 2 criteria later but ready to progress. Existing queue has lot of projects in advanced stages of development - should be able to connect earlier rather than wait for some other project that requested some other connection point and is ahead in the queue now.	No Comments	No Comments	No Comments

22	EDF Energy	Jonathon Hoggarth	Generator	Positive	Positive	Neutral	Negative
Summaries				Restrictions on technology changes and site boundaries without a clear justification which risks restricting the project development cycle and could result in genuine projects either being terminated or designed sub-optimally (which is in breach of Objective A. efficient discharge).	R concerned with lack of detail and guidance on key elements means that the current proposal does not meet the requirement of a minimum viable product. Several key concepts are in guidance documents which may not be produced until after the implementation date and no legal text is available. Where guidance is available, it is a work in progress with items TBC. To meet MVP, key concepts and details need to be fully described with accompanying legal text in order for industry to fully understand what is being proposed.Ambiguity not acceptable as impact is crucial to proposals function	No comments	R believes that the solution could discriminate against any project in the future that does not align with NGESO internal strategic approach if the CDNM is not published or is left open ended. It has the potential to favour technology types in the event one technology is favoured over another vs the economics
23	MaresConnect Limited	Holly Burke	Interconnector	Positive	Negative	Positive	Positive
Summaries				R does not believe the timeframe for existing interconnector projects being assessed in Ofgem's Window 3 process should be subject to the same timeframe for meeting the Gate 2 criteria	No comments	R believes interconnector projects with existing connection agreements should be exempt - need for a longer timeframe for existing interconnectors being considered in Ofgem's Third Cap & Floor Window. Want extending to 31 July 2025. R believes it unfair/ discriminate for the same Gate 2 criteria timetable to apply to these projects, as they have been delayed as a result of Ofgem's process/timing for a final decision and would struggle to achieve the Gate 2 criteria by 31 January 2025. Extension gives time to meet the criteria and obtain the required land interests, which may be delayed due to protracted commercial discussions and Environmental and Technical studies	Projects which are currently being assessed in Ofgem's Window 3 Cap & Floor process have been delayed by the delays to Ofgem's process and timing for a final decision, which was originally expected in Q3 2023 and is now expected in Q4 2024. Unfair and discriminate against these projects for the same Gate 2 criteria timetable to apply to these projects.
24	Google	Brian Denvir	Demand	Positive	Positive	Positive	Neutral
Summaries				R does do not support the application of the proposed connection process to contracts classified as 'connected,' regardless of whether or not some project stages are yet to be energised. The objective of the proposal is to ensure that viable projects can connect - connected projects have already demonstrated themselves to be viable. Changing the terms of connection agreements for assets that have already been energised creates uncertainty for investors and would undermine confidence in the connection process	"see response to CMP 434"	see response to Q6	No comments
25	Zenobe Energy	Duncan Hughes	Storage	Negative	Negative	Negative	Negative
Summaries				No comments	No comments	No comments	No comments
26	Enviromena Project Management UK Limited	Mark Harding	Generator	Neutral	Neutral	Neutral	Neutral
Summaries				No comments	No comments	No comments	No comments
27	Statkraft	Barney Cowin	Generator	Positive	Negative	Positive	Positive
Summaries				The respondent notes planning deadlines and calculation methodology.	The respondent states that the proposal might disadvantage legitimate complex projects due to inflexibility and inappropriate regulations.	The respondent notes that projects in 2024 should be allowed longer to meet Gate 2 criteria.	Respondent believes that projects with multiple landowners are discriminated against through the red line boundary change process. They added that recently accepted offers might not have had time to conclude land options.
28	Uniper UK Ltd	Paul jones	Generator	Positive	Negative	Negative	Negative
Summaries				Respondent feels the Project Designation Methodology does not need to be part of the MVP process	No comments to summarise	No comments to summarise	No comments to summarise
29	Haldane Energy Limited	Lawson Steele	Storage	Negative	Negative	Negative	Negative
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise

30	Northern Powergrid	Luke Scott	Distribution Network Operator	Negative	Negative	Negative	Negative
Summaries				No comment to summarise	No comment to summarise	No comment to summarise	No comment to summarise
31	Welsh Power	David Palmer	Generator	Negative	Negative	Negative	Negative
Summaries				No comment to summarise	No comment to summarise	No comment to summarise	Respondent believes all projects should have the same requirements for each gate.
32	SSE Generation Ltd	Garth Graham	Generator/ Supplier / Storage	Positive	Positive	Positive	Negative
Summaries				Respondent believes that Element 1, 5, 8, 9, 11, and 16 are in whole or in part no longer required referencing UK Government's ongoing policy development.	Respondent believes that TMO4+ does not sufficiently align with the end point of connections reform. They believe it is key that when implementing the reformed porcess it is clearly signposted for all stakeholders to ensure transparency.	Whilst the respondent recognises the need to reduce the queue they note that what is being proposed is a broad brushstroke approach applied to all projects regardless of technology type. The respondent believes that large scale technology classes with complex land leasing requirements may be unduly discriminated against.	The respondent believes that the proposed solution would not be unduly discriminatory However they have concerns around potential alternatives which could lead to discrimination when examining the legal text. The respondent notes this is based on the proposed retrospective changes to the Terms and Conditions to comply with retained EU law. The respondent also believes that the proposal favours technologies or projects that are less complex.
33	Eki Energy Limited	Nicky Ferguson	Storage	Negative	Negative	Negative	Negative
Summaries				No comments	No comments	No comments	No comments
34	National Grid Ventures	Andy Dekany	Interconnector	Positive	Positive	Negative	Negative
Summaries				Respondent believes ESO should focus on delivering technology specific solutions rather than a "one size fits all approach"	Respondent believes ESO should focus on delivering technology specific solutions rather than a "one size fits all approach" (reiterated)	Respondent does not agree that groups should be exempt from the scope.	Respondent believes there is significant potential for CMP435 to unduly discriminate against IC/OHA projects.
35	ScottishPower Renewables	Deborah MacPherson	Generator	Positive	Positive	Positive	Positive
Summaries				R believes evidence of land documentation should only be uploaded to the ESO portal for projects within the sample range of checks, rather than by every project. This is to avoid significant unnecessary admin for the developers	R seeking further details of supplementary/associated processes i.e. those not being codified. Required to be published prior to the conclusion of the consultation process, to allay concerns over the items not under the scope of the modification	R says ideally all projects should be included. However, if there are a small number of a specific project type (eg. OHAs) that bring unnecessary complexity and slow down the implementation, then these could be exempt from the MVP whilst an appropriate alternative process is devised.	Respondent believes there is a material risk that the proposed process could lead to the unintended consequence of discriminating on technology types and project size. i.e. some need to secure multiple land rights from multiple land owners, and others need to secure much less. BESS projects for example may only have 1 landowner but a typical windfarm will have circa 4-5.
36	Transmission Investment	Holly MacDonald	Interconnector	Neutral	Neutral	Neutral	Neutral
Summaries				Element 19 - Respondent is fundamentally concerned with the proposal to apply the Gate 2 criteria to the existing queue, and as such change the contractual arrangements of developers with respect to grid connection. The proposal to retrospectively apply the Gate 2 criteria to projects with a firm connection offer/agreement, and who have already paid the relevant fees undermines the existing process, causes uncertainty and therefore risk with investors	No comments to summarise	R is very concerned with Element 19. DOes not agree that Gate 2 criteria should apply to existing queue - will interfere with existing contracts with developers. Concerned r.e. legal feasibility, see it as beyond scope of proposal also. The proposal to retrospectively apply the Gate 2 criteria to projects with a firm connection offer undermines the existing process, causes uncertainty and therefore risk with investors. Projects with existing HND offers having to prove compliance with Gate 2 criteria to retain offer unreasonable requirement on developers and undermines HND process.	No comments to summarise
37	Electricity North West Limited	Steffan Jones	Distribution Network Operator	Positive	Positive	Negative	Negative
Summaries				Element 9 - Respondent noted Project designation and Element 14 - Gate 2 offer and project site location change	No comments to summarise	No comments to summarise	No comments to summarise
38	Muir Mhòr Offshore Wind Farm	Helen Snodin	Generator	Negative	Positive	Negative	Neutral
Summaries				No comments to summarise	Respondent is concerned proposal does not introduce a first-ready-first-served regime.	No comments to summarise	Respondent requests more detailed methodologies

	39	Energiekontor UK	Cameron Gall	Generator	Positive	Positive	Negative	Positive
Summaries					Respondent believes that the current methodologies are not the best way to process changes to the Gate 2 criteria, specifically and suggests a process that allows the industry to raise concerns and provide comments on proposed Methodologies.	Respondent believes the proposal lacks reference to queue management milestones M1 and M2 in the Gate 2 criteria, specifically for the Gate 2 to Whole Queue process and recommended the incorporation of M1 and M2 alongside land rights to determine queue position for sites seeking advancement in January 2025.	No comments	Respondent suggests the principle of "first ready, first connected" should be given more importance than currently proposed, advising that this approach allows the connection of the most mature projects and technologies.
	40	Ocean Winds	Nina Brundage	Generator	Negative	Positive	Positive	Positive
Summaries					No comments	The respondent supports allowing users to request proposed changes via modification application at the time of submission. The respondent also noted that could be benefit in users being allowed to make some changes at gate 2 application for example TEC reductions.	The respondent believes that projects that have reached final investment decision and all started construction should be exempt from the process.	The respondent believes that ScotWind developers may be discriminated against as they may not have their post-holistic network design AtVs agreed and signed prior to 31st Jan 25.
	41	Energy UK	Tobias Burke	Industry Body	Positive	Positive	Negative	Positive
Summaries					The respondent believes Element 14 is unnecessary.	The respondent broadly agrees with the content of the MVP reforms but mentions that proposals outlined for guidance documents (CNDM, Project designation, significant mod apps, gate 2 criteria) may need to be codified instead. The respondent recognises the need for flexibility however states that investment certainty is needed and guidance changes may discourage investment in future years. The respondent also believes that there is legal challenge for changing existing contracted projects so suggests that Government step in with a more specific programme to avoid this.	The respondent believes all projects in the existing queue should be subject to some version of the proposal taking into consideration any unintended consequences.	The respondent believes projects in the existing queue with a genuine intent to connect may risk unjustly being offered later dates than those that apply after the go live date.
	42	Scottish Renewables	Stephen McKellar	Industry Body	N/A	Negative	N/A	Neutral
Summaries					The Respondent re-iterates points raised in Element 19 and 20 being concerned that embedded projects without a BELLA or BEGA will need to liaise with the DNO directly. Concerned when the queue is reordered for the first time, if embedded customers are disadvantaged through the reliance on several BAU processes that are untested in new world. Suggests that there is a concern across a number of members that the impact will be enduring as the initial reordering will set the new baseline and Respondent agrees with the need for a "cut over" period (noting the difference from the transitional period), the proposed timeframe is believed ambitious for developers, Proposer and the Authority.	No further comments	The respondent believes project with 2024 accepted offers should be considered further, particularly if implementation were to be postponed. The respondent also believes Large Demand should have alternative provisions as it is driven by other markets.	The respondent believes Embedded Projects are to be at risk from the implementation phase which the cut over arrangements trigger.
	43	NGED	Sarah Kenny-Levick	Distribution Network Operator	Positive	Positive	Negative	Positive
Summaries					The respondent believes an interim version of a system benefit prioritisation should be included.	The respondent believes extra milestone checks, system benefit prioritisation flagged by DNOs, full 100% certification of the gate 2 criteria and alignment of the transmission and distribution processes are features that need to be included.	The respondent believes it is important that all projects are treated fair and consistent but they note that element 9 would be practical for DNOs to nominate certain schemes of acceleration dependant on network need.	The respondent believes the gate 1 and 2 processes would likely give an advantage to smaller projects as they can achieve land rights quicker, but notes this is seen as a positive. They also add that the current proposal will allow some distribution connected projects to apply for Gate 2 sooner than transmission connected projects.
	44	ib vogt	Jingling Sun	Generator	Negative	Positive	Negative	Negative
Summaries					No comments	The respondent notes a query on wil customer be allowed to give back some capacity for some of their existing projects?	No comments	The respondent believes the proposed solution is justified.

	45	RenewableUK	Barnaby Wharton	Industry Body	Neutral	Negative	Neutral	Neutral
Summaries				No comments to summarise	No comments to summarise	Respondent believes 2024 accpeted offers and large demand parties need further consideration	Respondent believes embedded projects are at risk of unintended discrimination.	
	46	SSEN Distribution	Michelle MacDonald Sandison	Distribution Network	Negative	Positive	Negative	Negative
Summaries				Believe all elements proposed are required to be effective	Believe there needs to be a clear directive from legislation	Repsondent does not believe any groups should be exempt from the proposal.	Do not believe any projects are discriminated against	
	47	RWE Renewables & RWE Supply & Trading	Claire Hynes & Tim Ellingham	Generator	Neutral	Neutral	Negative	Positive
Summaries				No comments to summarise	No comments to summarise	Respondent supports speculative projects being removed from the connection queue	Respondent believes embedded projects are at risk of unintended discrimination.	
	48	Bute Energy Ltd	Douglas Allan	Generator	Negative	Positive	Negative	Positive
Summaries				No comments	No comments	State that the proposed solution allows for exemption.	Believe that the current proposal discriminates against onshore wind and other projects that require longer environmental studies.	
	49	Green Generation Energy Networks Cymru Ltd	Daryn Lucas	Distribution Network Operator	Negative	Positive	Negative	Negative
Summaries				No comments to summarise	Respondent feels the implications on the existing cancellation liability and security requirements arising as a consequence of CMP435 needs to be considered in more detail	No comments to summarise	No comments to summarise	
	50	Research Relay Ltd	Dennis Gowland	Generator	Negative	Positive	Negative	Positive
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	No comments to summarise	
	51	BayWa-re UK	Graham Pannell	Generator	Negative	Positive	Negative	Positive
Summaries				No comments to summarise	Respondent agrees however reservations must be transparent	No comments to summarise	Respondent believes embedded projects are at risk of unintended discrimination.	
	52	Xlinks Morocco UK Power Project	John Greasley	Generator	N/A	N/A	N/A	Positive
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	Respondent suggests processes should be specifically considered for offshore "mega" projects to avoid potential undue discrimination against them.	
	53	Community Energy Scotland	Eibhlin Norquoy	Generator	Negative	Positive	Positive	Positive
Summaries				No comments to summarise	Respondent believes a project designation for community generators should be included.	Respondent believes community generators should be exempt from the scope	Respondent believes embedded projects are at risk of unintended discrimination.	
	54	Field	Andy Ho	Storage	Neutral	Neutral	Neutral	Neutral
Summaries				No comments	No comments	No comments	No comments	
	55	SP Energy Networks	Gareth Williams	Distribution Network	Negative	Negative	Negative	Positive
Summaries				No comments to summarise	No comments to summarise	No comments to summarise	Respondent is supportive of the first ready, first connected approach however, believes the Gate 2 Criteria too low. Supportive of making Gate 1 mandatory. Concern criteria based on obtaining land will hinder TOs' with different technologies sought land later in the process.	
	56	OnPath Energy Limited-inc Kype Muir Wind Farm	Dan Thomas	Generator	Neutral	Neutral	Neutral	Neutral
Summaries				No comments	No comments	No comments	No comments	
	57	Low Carbon	Ed Birkett	Generator	Negative	Negative	Positive	Positive

Summaries				As per Question 5, the following Elements should be removed: Element 9: Project Designation. Element 14: Gate 2 Offer and Project Site Location Change.	No comments	The respondent believes the Secretary of State should have the ability to grant projects time-limited exemptions from each of the requirements in both CMP434 and CMP435. This would avoid unintended consequences in relation to strategic projects such as nuclear and gigafactories. The proposed Project Designation Element is not appropriate for this purpose, as the decision to grant these exemptions is inherently political rather than technocratic	As per Question 5 (Element 5), many contracted interconnectors may struggle to meet the Gate 1 Criteria – if this is applied. This is because it is unclear whether CE/CES has agreed to provide letters, or what criteria they would use to decide whether or not to provide letters.
58	National Grid Electricity Transmission	Richard Woodward	Transmission Owner	Positive	Negative	Negative	Negative
Summaries				The respondent believes that unless the work group or proposal can demonstrate specific differences in how the elements apply to new users in CMP434 compared to CMP435 we believe the following elements can be removed from scope: 1,3,5,9 and 16.	No comments	The respondent believes the only possible exceptions could be where the ESO exercises its project designation right if permitted by Ofgem.	The respondent does not believe CMP435 in isolation discriminated by project type.
59	Scottish Hydro Electric Transmission plc	Greg Stevenson	Transmission Owner	Positive	Positive	Negative	Positive
Summaries				No comments	The respondent believes there should be an additional technology based criteria element applied to the existing queue to ensure technologies that proceed are aligned with net zero targets.	The respondent is satisfied that all groups of projects should be subject to CMP435 and that it is appropriate for all elements to apply.	The respondent believes that introducing a technology element to the gate 2 criteria would help to minimise any inherent advantages that some technology types have in terms of achieving the criteria.
60	Wind2 Limited	Ian Curry	Generator	Negative	Negative	Positive	Positive
Summaries				No comments	No comments	No comments	No comments
61	Buchan Offshore Wind	Craig Duffy	Generator	Negative	Negative	Negative	Negative
Summaries				No comments	No comments	No comments	No comments
62	Qualitas Energy	Grant Rogers	Generator	Positive	Positive	Negative	Positive
Summaries				The respondent beleives Element 14 should not be included and does not represent MPV. Element 14 adds not benefit to the proposal however it adds a high risk of increased speculation and gaming of the new process that risks completely undermining the positive impact of the Proposal. Removal of element 14 does not diminish the effect of the proposal or negatively effect MPV in any way.	Respondent says a clear, and ideally codified, methodology of how existing DNO contracted Customers will be considered within the new Gate 2 queue is needed. Most DNO Customers are held by TO interface outcome deadlines e.g. the DNO timescale may be a connection available in 2027 but the TO outcome states 2038. Many of these DNO Customers will be viable to achieve Gate 2 by Jan 25 (or may already have achieved it). Need clarity on how this will be addressed to ensure fairness across all DNO's and the ESO in terms of equal treatment of connecting Customers (and/or no detrimental effect to Customers based on application voltage). This is fundamental to CMP435 and needs to be addressed and included within the proposal and ideally codified as soon as practicable, even if this must be after implementation.	No comments	Respondent says that without careful consideration and clear methodologies agreed (and ideally codified) across the ESO and DNOs theres risk varied discrimination to DNO connected Customers with ESO/TO works required as a result of the Transmission Interface outcome. A process and methodology for this, that applies across the board, to ensure mitigation of any potential discrimination should be included in the Proposal. Proposal also risks unduly biasing interconnector and hybrid interconnector applications by issuing a "G2 type" offer at G1 stage. This inclusion should be considered for removal where the application is for a generator/generation. All generation Customers should be treated the same regardless of whether directly connected or hybrid interconnector. Doing otherwise will skew favour towards these specific projects which will have greater certainty at an early stage over and above any other applicant (there is also question as to how this can even be achieved at Gate 1 considering no studies will be carried out).
63	eSmart Networks Ltd	eSmart Networks Ltd	Other	Neutral	Positive	Neutral	Neutral
Summaries				The respondent notes that Gate 2 criteria is insufficient to efficiently reduce the existing transmission queue.	The respondent notes that Gate 2 criteria is insufficient to efficiently reduce the existing transmission queue.	No comments	The respondent notes that of embedded demand.

64	Apatura Energy Ltd	James Potter	Generator/ Storage	Neutral	Neutral	Neutral	Positive
Summaries				Respondent neither agrees or disagrees.	Respondent neither agrees or disagrees.	Respondent neither agrees or disagrees.	The respondent believes that expediting projects via a process that is not codified will discriminate against projects in the queue and impact project viability.
65	Telis Energy UK	Florent Leblanc	Generator/ Storage	Neutral	Neutral	Neutral	Neutral
Summaries				No comments	No comments	No comments	No comments
66	Solar Energy UK	Kara Davies	Consumer Body	N/A	N/A	N/A	N/A
Summaries				No comments	No comments	No comments	No comments
67	The Crown Estate	Chris Gent	Other	N/A	N/A	Positive	Positive
Summaries						The responder seeks to ensure no inadvertent impacts or disadvantage from both the choice of implementation timing and gate criteria on critical “in-flight” offshore wind projects. Encourage ESO to safeguard connection capacities and connection point locations for offshore energy projects that are part of leasing or related processes that commenced prior to the final connection reform proposals, are currently ongoing and are expected to conclude in 2025 during the connection reform implementation period and where the choice of timings In particular we refer to Offshore Wind Leasing Round 5 and associated HNDFUE connection recommendations, to Floating Wind Test & Demonstration projects, and to Habitat Regulations Assessment (HRA) processes that relate to leasing of the Awel y Môr, Dudgeon Extension, Sheringham Shoal Extension, North Falls, Five Estuaries, Rampion 2 and Dogger Bank D offshore Workgroup Consultation CMP435 Published on 25/07/2024 - respond by 5pm on 06/08/2024 6 of 7 wind projects Look forward to understanding how Elements 8, 9 and 10 can be applied in these circumstances.	
68	Bluefield Development	Jonathan Selwyn	Other	N/A	N/A	N/A	Positive
Summaries				Opposed to CMP 434	No comments	No comments	The responder thinks CMP435 gives too much power to the ESO to determine which projects should be prioritised. No clear indication of how the prioritisation process will be structured, who makes the decision and how it is justified, what right of appeal there will be, how long decisions will take, how they will be communicated and how the whole process will be policed. Experience of the SoW/PP process suggests that the ESO will be unwilling to feedback any information or engage in any dialogue with distribution customers. Relationship ESO and DNOs will inevitably result in distribution customers being discriminated against
69	British Solar Renewables Ltd	Christie Sims	Generator / Storage	Neutral	Neutral	Neutral	Neutral



Summaries				No comments	No comments	No comments	Respondent states the land requirements remove flexibility from hybrid projects, whilst reducing their scope. A combined solar/storage application may have sufficient land for the full TEC amount of storage but only some small solar, and over the years of development find other land that can be used to increase the solar to match the storage level. This is likely to require much more land, however the project would have been able to meet Gate 2 with smaller lands due to meeting the TEC with storage alone. There is no advantage to punishing solar like this and it would result in less MW being deployed and less efficient use of the transmission network.
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