

Workgroup Consultation Response Proforma

CMP434: Implementing Connections Reform

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

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

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

Respondent details	Please enter your details	
Respondent name:	Greg Stevenson	
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Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input checked="" type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:
 (Please mark the relevant box)

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

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

For reference the Applicable CUSC (non-charging) Objectives are:

- a) *The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- b) *Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;*
- c) *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- d) *Promoting efficiency in the implementation and administration of the CUSC arrangements.*

*The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.

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

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the Original solution better facilitates: Original <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
<p>A – Positive</p> <p>We agree that the Original Proposal better facilitates Objective A than the baseline. We support the broad policy intent of these proposals and believe that the proposed gated connections process is a step forward in reforming connections to the National Electricity Transmission System (NETS) by moving towards a first readier, first connected approach which will allow viable projects to progress to connection quicker than the current first come, first served connections process.</p> <p>The current process is not fit for purpose as is evidenced through the current size of the queue. This proposal, if approved and developed further, could help contribute to the achievement of Net Zero targets set by the Scottish and UK Governments.</p> <p>B – Positive</p> <p>This modification will facilitate effective competition by implementing a process that will ensure those customers who are more ready to connect, can be accelerated through the process quicker than under the baseline approach.</p> <p>Although the proposal generally improves the competition element, it could lead to unintended consequences, for example potentially advantaging projects that can more easily secure land and obtain consent, potentially resulting in a significant volume of Battery Energy Storage Solutions (BESS) moving through Gate 2 and joining the connections queue. This in effect could distort competition as we may see a higher percentage of batteries connecting to the NETS, allocating scarce network capacity to these projects based upon the speed at which they can reach Gate 2.</p> <p>To alleviate this issue and strengthen the new TMO4+ process, we believe that Gate 2 criteria should be enhanced to include a technology-specific element, reflecting system need to deliver Net Zero targets (see further details in Q3). This additional element could be supported through the Government’s Strategic Spatial Energy Plan (SSEP), alongside the CSNP, establishing Net Zero requirements.</p> <p>C – Neutral</p> <p>D – Positive</p>		

	<p>In terms of promoting efficiency, the proposed process should reduce some inefficiencies inherent within the current process. For example, it has the potential for reducing the volume of projects that are given interactive offers, where many offers subsequently have to be updated/reassessed. We do note, however that the elimination or reduction of interactivity will depend on the frequency and duration of Gate 2 assessments. Interactivity can cause significant inefficiency, as projects that are ready to connect are stalled, with an increased timeframe for when they can receive an offer that is unconditional on other projects.</p> <p>In line with the proposal listed under CM095, for TOs these changes will also allow network studies to be carried out in a more coordinated way, through proposed batched assessments within the TMO4+ process. The offers we provide will have been studied against a more industry-informed background, which could improve investment planning processes.</p>	
2	<p>Do you support the proposed implementation approach? (see pages 59-61)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Yes, in general we support the proposed implementation approach. There is a great deal of work needed in preparation for implementation, and with some detail still being worked though, we would encourage ESO to retain the current pace of change to ensure effective delivery.</p> <p>In relation to the implementation timeline, we believe that work underway with TOs should continue at pace to determine an efficient, appropriate and workable timeline for each stage of the new process. This includes the time needed for Gate 1 and Gate 2 assessments. The development of the Connections Network Design Methodology (CNDM), which is currently being determined collaboratively with TOs, is a key enabler to ensuring this. It is imperative that all ESO Guidance Documents are finalised and published ahead of go-live to ensure the success of the new process. This includes all the Methodologies that sit outside of the Modifications, Connections Network Design Methodology (CNDM), Gate 2 Methodology and NESO Designation Methodology.</p> <p>We also recognise that the suite of Connections Reform Modifications cannot be implemented without the relevant changes being made to the Transmission Licence for ESO and TOs. We are committed to continuing to support work commencing on this as soon as possible to ensure a smooth transition into the reformed connections process.</p>		
3	<p>Do you have any other comments?</p>	
<p>Although we are supportive of this proposal and are committed to working collaboratively to improve the connections process, we do not feel that the proposal goes far enough to resolve the current connections challenges. We are concerned that, based upon the proposed Gate 2 criteria, the benefits of reducing the queue could be short-lived and fail to reflect Net Zero requirements, leading to the need for further change.</p>		

	<p>With this in mind, we believe that the process needs to be aligned with future strategic planning. By considering technology-specific requirements aligned to Net Zero targets within the process, this would help ensure the right balance of technologies and support in developing robust investment plan needs at an earlier stage.</p> <p>Consideration must be given by Ofgem to the potential impact of the introduction of TMO4+ on TO obligations and impacts on their existing incentives, such as Timely Connections and Quality of Connections. We are aware of Ofgem’s ongoing review of obligations and incentives and would encourage prioritisation of reviewing existing RIIO-T2 obligations in the context of the new TMO4+ process.</p>	
4	<p>Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?</p>	<p><input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section)</p> <p><input checked="" type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>		

<p>Specific Workgroup Consultation questions</p>		
5	<p>Do you agree with the elements of the proposed solution? Element 7 has been de-scoped and Element 10 is proposed to be codified within the STC through modification CM095. Please provide rationale for your answer and any suggestions for improvement to each element?</p>	
	<p>Element 1: Proposed Authority approved methodologies and ESO guidance (see pages 9-10, 55)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>We are supportive of the proposed approach with associated methodologies, given that these will be governed by an Authority approved governance process which involves industry input and the opportunity to raise concerns.</p> <p>This approach will allow greater flexibility in making amendments/improvements to the relevant methodologies and guidance. We note the importance of ensuring rigour, transparency and collaboration in updating the methodologies and guidance. We agree with ESO’s proposal that any amendments to the methodologies must be consulted upon and approved by Ofgem.</p> <p>We support the ESO’s proposal to utilise guidance documents to ensure clarity is provided to developers seeking connection and modifications to their connection and look forward to working with ESO to develop and maintain these documents.</p> <p>We request that any future amendments to the guidance documents are clearly communicated to relevant industry parties and highlighted on ESO’s website, to minimise risk of any industry party being unaware of the changes. We encourage ESO to formalise a timeline/process for communicating such changes.</p>		

<p>Element 2: Introducing an annual application window and two formal gates, which are known as Gate 1 and Gate 2 (i.e. the Primary Process) (see pages 11, 35-36)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Yes, we agree with the proposal to introduce an annual application window and two formal gates under the new Primary Process, but we are mindful that there is still a lot of detail to be worked through and decisions to be made regarding the design of the new process.</p> <p>At a high level, the overall design of the process (as seen in ESO’s Indicative Process Timeline) needs testing, including walkthroughs of various customer scenarios.</p> <p>We note that the latest draft of the Indicative Process Timeline does not include a pre-application stage. We would welcome engagement from ESO as to the reasons behind this stage being removed, as we feel pre-application engagement has benefit and value for customers.</p> <p>In addition, some of the intricacies of the process still need to be considered, including for example the process to be followed if a customer rejects their Gate 2 offer.</p> <p>It will be vital, once worked through, that the design and details of the process are clear, transparent and easily accessible for customers.</p>	
<p>Element 3: Clarifying which projects go through the Primary Process (see pages 11-12, 35-36)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Yes, we agree with the projects that will go through the Primary Process.</p> <p>We note that it is not clear from this table that some embedded schemes will not go through the Gate 1 process. We request that the table is updated to be clear on which customer groups follow which processes.</p>	
<p>Element 4: Significant Modification Applications concept, including the proposed criteria and the proposed level of codification (see pages 12-13, 36-39)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>We agree with the proposal to codify the concept of a ‘Significant Modification Application’ and understand the rationale. We look forward to working with ESO to establish clear criteria for Significant Modification Applications and the associated processes and guidance.</p> <p>The Significant Modification Application concept and guidance should be evaluated in terms of its impact on customers at various stages of the project journey, and appropriate mitigations made to ensure that customers at more advanced stages (eg delivery) are not unduly impacted.</p>	
<p>Element 5: Clarifying any Primary Process differences for customer groups (see pages 13-14, 35-36)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>We understand the deviations from the primary process, but the ESO must ensure that any deviated project does not get any undue preferential treatment over customers that are required to go through the Primary Process; any differences in treatment between customer groups need to be justified and documented.</p>	

<p>For Interconnectors and Offshore Hybrid Assets (OHAs), we see a real need for clear processes and timelines to ensure that the necessary system planning studies can be carried out to provide confirmed connection dates and points.</p>	
<p>Element 6: Setting out the process and criteria in relation to Application Windows and Gate 1, including introducing an offshore Letter of Authority equivalent as a Gate 1 application window entry requirement for offshore projects (see pages 15-16, 39-40)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>In relation to the Application Windows, we note that there is no time allocated to pre-application engagement at Gate 1 or Gate 2 and we welcome clarity on why this is. Customers find value in pre-application engagement, so we would be keen to see this continue in the new process.</p> <p>We note that at present, the diagram shows applications and competency checks happening consecutively. We believe it would be more efficient to have competency checks start when the customers have applied so that feedback can be given to customers quickly and they have time to rectify any issues in their application.</p> <p>The introduction of an offshore LoA is welcomed, as this aligns with the requirements for onshore applications.</p> <p>The ESO should work with the TOs to fully assess the duration of these Gate 1 stages in order to determine an adequate timeframe for providing an offer. This will be key in setting out the timeframes within the proposed licence changes, noting that TOs may see a high volume of applications in each annual window.</p>	
<p>Element 7: Fast Track Disagreement Resolution Process (de scoped from this modification – see pages 16, 58)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>n/a</p>	
<p>Element 8: Longstop Date for Gate 1 Agreements (see pages 16, 40-41)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>We agree that there is a need to place a restriction on customers remaining in Gate 1 indefinitely and the concept of a longstop date seems like a reasonable approach.</p> <p>We note that the current proposal is for the longstop date to place a time limit between Gate 1 offer acceptance and Gate 2 offer acceptance but that other options are still being considered. Whichever option is taken forward, it is vitally important that the information ESO provides to customers is abundantly clear on what exactly the longstop date means for them and how to ensure their project is not terminated due to a lack of clarity over the longstop date.</p> <p>We welcome discussion with ESO to understand the detail of how longstop terminations will work – for example, the communication between ESO and TO regarding terminations, and whether ESO will provide reminders/prompts to customers regarding their upcoming longstop date deadline.</p>	

<p>Element 9: Project Designation (see pages 17-18, 48-49)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Yes, we understand the need for a Project Designation process and its potential benefits for the NETS.</p> <p>We note the importance of having transparency over the Project Designation process criteria, and ensuring customers understand the process, when it will be used and details of eligibility criteria.</p> <p>We are comfortable with the Project Designation concept being codified and the methodology being contained in a separate document and agree with the proposed governance approach for this methodology.</p> <p>We are keen to understand more about how project designation will work in practice, including understanding:</p> <ul style="list-style-type: none"> • How projects will be chosen by ESO • How ESO will seek to minimise or mitigate any potential negative impacts on other customers • The communication pathway for the ESO notifying TOs that a project has been designated. 	
<p>Element 10 Connection Point and Capacity Reservation (proposed to not be codified within the CUSC, but is intended to be codified within the STC through modification <u>CM095</u> – see pages 18-20 and the <u>CM095 Workgroup Consultation</u>, pages 6-10)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Please see SSEN-T response to consultation CM095 in relation to Component C. Additionally, we note the ESO’s Connection Point and Capacity Reservation intentions and would welcome discussion on opportunities that this could bring for particular customer groups (eg Community Energy Projects).</p>	
<p>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 (see pages 20-24, 42-46)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>The proposed Gate 2 criteria is a useful first step in terms of introducing criteria, but the addition of a technology-specific element would further strengthen the criteria, ensuring that projects entering the connections queue are better aligned to Net Zero targets.</p> <p>We have concerns regarding the forward-looking proposal for the QM M1 milestone since it is not proposed that the forward-calculated deadline will take into account the project connection date. This creates the real risk of planning consent lapsing for developers with lengthier projects, as acknowledged by ESO in the consultation document. We feel strongly that a backward-calculated date for M1 is far more appropriate and better meets customers’ needs. In addition to this, we are not in favour of a move to forward-calculated dates in general for queue management milestones as we do not understand the tangible benefits of doing so, especially if they do not take into account the duration of the project.</p>	

<p>Element 12: Setting out the general arrangements in relation to Gate 2 (see pages 25-26, 47)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>The proposed Gate 2 process has been set out at a high level, and in order to fully appraise the arrangements we would need to understand the next level of detail (eg durations of each step in the process, and the information exchanges between parties). We look forward to continuing to engage with ESO to agree appropriate and workable timeframes and processes.</p> <p>The proposed timeline diagram shows crossovers between Gate 2 assessment periods and Gate 2 offer periods, meaning that Gate 2 assessments are undertaken whilst previous Gate 2 offers are still open for acceptance. There are two key risks from this:</p> <ul style="list-style-type: none"> • System planning assessments are being made without a confirmed contracted background, meaning that the assessments are based on less robust information. • An increased risk of interactivity which causes uncertainty for customers and increases workload on TOs. <p>These issues could be avoided if the frequency and duration of the Gate 2 process were amended to avoid any crossover between assessment and offer periods.</p>	
<p>Element 13: Gate 2 Criteria Evidence Assessment (see pages 26-27, 47-48)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>We agree that it is appropriate for ESO/DNO/iDNOs to undertake a validity check of the signatory of each Self-Certification.</p> <p>In terms of Land Registry checks, our strong preference would be for the ESO/DNO/iDNO to check 100% of submissions. If this is not possible, then we urge ESO/DNO/iDNOs to consider how to maximise the volume of checks and to share their approach and rationale, including how any risks will be mitigated, and to keep this under review. This is important to ensure the integrity of the new TMO4+ process.</p>	
<p>Element 14: Gate 2 Offer and Project Site Location Change (see pages 28, 46)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>We understand the rationale for this proposal and note ESO’s points regarding the limitations and potential take-up of this option. Nevertheless, with effective management we feel it is a valid option to retain for customers as it may suit certain circumstances.</p> <p>Given the complexities and the potential adverse consequences, it needs to be made abundantly clear to customers what it means for them if they opt to take up this option.</p>	
<p>Element 15: Changing the offer and acceptance timescales to align with the Primary Process timescales (e.g. a move away from three months for making licenced offers) (see pages 29, 42-46)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<p>We agree that the offer and acceptance timescales should be reviewed. As referenced in Element 12, we look forward to continuing to engage with ESO to agree appropriate and workable timeframes and processes. Developing and agreeing a new Process Timeline (and the associated lower-level detail) is essential to inform any licenced obligations.</p> <p>In doing so, careful consideration needs to be given to the likely volume of applications that will be received, which may vary between each window. Consideration also needs to be given to the frequency of Gate 2 windows which – in addition to the Gate 1 window – means that TOs are consistently assessing and processing applications/offers throughout the year.</p>	
<p>Element 16: Introducing the proposed Connections Network Design Methodology (CNDM) (see pages 29, 53-55)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Yes, we agree with codifying the concept of the CNDM at a high-level with the Methodology to sit outside of the codes and agree with the proposed governance approach for methodologies. We look forward to continuing to engage with ESO through the CNDM workshops.</p>	
<p>Element 17: Introducing the concept of a Distribution Forecasted Transmission Capacity (DFTC) submission process for Distribution Network Operators (DNOs) and transmission connected Independent Distribution Network Operators (iDNOs) to forecast capacity on an anticipatory basis for Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations aligned to the Gate 1 Application Window</p> <p>(see pages 30-33, 51-53)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>We do not believe that DFTC should form part of the proposal as the DFTC process has no bearing on whether Embedded customers can proceed to Gate 2. We believe it would be more beneficial to align the process with the Week 24 Demand Forecast process which would require a Grid Code modification.</p> <p>If it was taken forward, we do not support the proposal of no Application Fee for Gate 1. TOs will be carrying out work to provide indicative date/location for all the GSPs on our network. There needs to be discussions on a cost-reflective fee for this work if DFTC is taken forward as part of the proposal.</p>	
<p>Element 18: Set out the process for how DNOs and transmission connected iDNOs notify the ESO of Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations which meet Gate 2 criteria (see pages 33-34, 51-53)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>Yes, we understand the proposed process for how DNOs will notify the ESO of embedded customers that have met Gate 2 Criteria.</p> <p>We are comfortable with the Project Progression process being used however work is still required on some of the related details, including the way in which Transmission Impact Assessment and Technical Limits processes will work alongside the new TMO4+ process.</p>	

6	<p>Are there any elements of the proposal which you believe should not be included as part of this proposed solution, which the Proposer believes represents the 'Minimum Viable Product' reforms required to the connections process? If not, why not? (Please note the element number in each of your responses if applicable)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>As stated in our response to Element 17, we do not believe DFTC should form part of the proposed solution.</p>		
7	<p>As per question 6, are there any additional features which you believe should be included as part of Minimum Viable Product reform to the connections process?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>As stated in response to question 3, we believe there should be a technology element added to the Gate 2 criteria.</p>		
8	<p>Do you agree that the Gate 1 process should be a mandatory process step, or do you think Gate 1 should be an optional process step with projects being able to apply straight into the Gate 2 process if the project meets both the relevant Gate 2 and Gate 1 criteria?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>We believe that customers should be allowed to submit a joint Gate 1 and Gate 2 application, if they meet all the relevant criteria, and be allowed to progress to Gate 2 at the soonest appropriate opportunity.</p> <p>At this point in time, it is not possible to determine whether it would be entirely appropriate for Gate 1 to be optional. The CNDM workgroup is yet to work through and agree the methodology and outputs for Gate 1. Without this being agreed, we do not feel able to accurately appraise the value and necessity of Gate 1.</p> <p>Nevertheless, in our response to ESO's 2023 Connections Reform consultation we (and other respondents) noted our concerns regarding multiple windows for new applications each year. If Gate 1 were optional and new customers were able to apply to any of the Gate 2 windows within the year, we are concerned that there could be negative unintended consequences and inefficiencies.</p>		
9	<p>Do you believe that the proposed Gate 1 and Gate 2 process could duly or unduly discriminate against any types of projects? If so, do you believe this is justified?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>In the absence of any technology considerations at Gate 2, we believe that the proposed Gated approach could be an enabler for BESS projects to obtain a queue position sooner than some other project types.</p>		
10	<p>Please provide your views on the proposed options ((a) to (e) on page 45/46) to mitigate the risk of requiring a developer to submit their application for planning consent earlier than they would in their development cycle (with the risk this consent could expire and any extension from the Planning Authority is not automatic).</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Option A: The wording of this option appears to imply that the forward-calculated M1 date would be tailored to take into account the connection date of the project. If</p>		

	<p>this is the case, we believe this is a less troublesome approach than having a set duration for a forward-calculated M1 date. However, we question whether a tailored forward-calculated M1 date offers any tangible benefit compared to a backward-calculated M1 date.</p> <p>Option B: We do not have any direct experience of the 10% spend rule as used in CfDs. However, we note that some significant unintended consequences of this rule were highlighted in the ‘Energy Act 2013: 5 year review’ government policy paper published in May 2022. In particular, the ‘rush’ to spend this money led to developers undertaking less cost-effective, lower quality procurement decisions; we do not feel it is appropriate or justified to cause or encourage this type of behaviour and would prefer to explore other options. Additionally, it would be resource intensive for customers to prove their spend, and similarly resource intensive for ESO to verify this spend.</p> <p>Option C: This option still carries the risk (for projects with later connection dates) of consent expiring. We do not support this option.</p> <p>Option D: Whilst this would help to reduce the risk of planning consent lapsing, we do not see the benefit of this approach over all customers having backward-calculated dates. Additionally, having two different approaches to calculating the M1 milestone date is more complex to explain to customers and potentially more complex to administer.</p> <p>Option E: We feel it is appropriate to have a rectification route available for customers who require it due to extenuating circumstances. However, we do not feel it is appropriate to design a process whereby a rectification period will be a necessary process step for all customers in a particular situation (ie customers with connection dates in X years’ time).</p>	
<p>11</p>	<p>Do you agree that DFTC should be included as part of CMP434? If not, do you believe that the reformed connections process can function without DFTC? Please justify your answer. (see pages 30-34, 51-53)</p> <p>No, we do not believe that DFTC should be included as part of CMP434 and yes, we believe that the reformed connections process can function without DFTC. There should be alignment with an improved Week 24 Demand Forecast process currently being proposed through the Grid Code Modification GC0139.</p> <p>DFTC has lost its original key benefits following the change from TMO4 to TMO4+ and it is now effectively a complex data exchange process which no longer adds value. A simpler process would be for TOs to provide DNOs with indicative connection dates, using an enhanced Week 24 process that includes generation data.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

12	<p>The Proposer intends to set out supporting arrangements for TMO4+ via a combination of guidance and methodologies (e.g. DFTC, CNDM, Project Designation, Gate 2 Criteria). Do you anticipate any issues with having these outsides of Code Governance? (see Pages 9-10, 55)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>We agree with ESO's proposed governance processes with regards to the methodologies.</p> <p>In terms of the guidance documents, we feel there would be benefit in ESO setting out a framework for: reviewing these documents; proposing amendments; communicating amendments; and publication of updated guidance documents. This clarity and transparency will help ensure that industry members are aware of any updates and better understand them and any implications from these updates.</p>		