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Connections Reform

Consultation Response Proforma

Your feedback is important to this process. Please take this opportunity to provide any feedback that you may have. To aid your response, each question is linked back to the relevant document for ease of reference.

Please provide your feedback using this Proforma and sending an electronic copy to box.connectionsreform@nationalenergyso.com by **5pm** on the closing date of **2nd December 2024**.

We encourage early submission ahead of the deadline where possible to aid the processing of responses.

Respondent Details	
Name	Ben Clarke
Organisation	Bute Energy Ltd
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Which category best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other
Is this response confidential?	<input type="checkbox"/> Yes – I do not wish for this response to be shared publicly; however I understand it will be shared with Ofgem <input checked="" type="checkbox"/> No – I am happy for my response to be available publicly

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Section 1 – Policy

You can find the relevant information in the **Great Britain’s Connections Reform: Overview Document**

1. Do you agree with our intention to align the connections process to Government’s Clean Power 2030 Action Plan?

You can find the relevant information in **Section 2 – Context**

Yes. Bute Energy supports the notion that projects progressing through the connections process should be aligned with national de-carbonisation targets.

2. Do you agree with our proposal for overall design 2 (that the reformed connections queue should be limited to and prioritised to only include ready projects that align with Government’s Clean Power 2030 Action Plan, NESO Designated Projects, and directly connected demand projects outside the scope of Government Clean Power 2030 Action Plan)?

You can find the relevant information in **Section 5 – Our overall preferred connections reform design**

Yes. Bute Energy supports the Overall Design 2 proposal.

3. Do you think all ‘ready’ projects should be included in the reformed connections queue (overall design 3)? If so, how would you propose that we mitigate risks to consumers or developers of material misalignment to the SSEP?

You can find the relevant information in **Section 6 – Assessment of alternative design for connections reform**

Bute Energy supports the principle i.e. ‘ready’ projects that are not aligned with CP30 should not be granted queue positions.

The CP30 plan highlights the need for specific generating technologies to be strategically located across the UK to meet decarbonisation targets. Awarding queue positions to projects that do not align with CP30 risks inefficient investment in the GB power system and could hinder the nation’s ability to achieve its energy goals.

4. Do you agree that the reformed connections queue should initially focus on the 2035 time horizon?

You can find the relevant information in **Section 4 – Key building blocks for aligning connections to strategic energy plans**

Yes. Bute Energy supports the 2035 time horizon with the intermediate 2030 goal.

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Implementation Questions

You can find the relevant information in the **Great Britain's Connections Reform: Overview Document**

5. Do NESO's preferred options against each of the variables discussed in the Overview Document best deliver efficient alignment to Government CP30 Plan?
You can find the relevant information in Section 5 - Our overall preferred connections reform design and Section 7 - Further variables and options to align connections reform with strategic energy planning
Bute Energy agrees with the preferred options.

6. Do the methodologies deliver our preferred options against each of the variables?
You can find the relevant information in Section 3 - Overview of framework of codes and methodologies for connections reform
Yes.

7. Are there key policy areas that are not covered by our preferred options against each of the variables or that would not be delivered by the methodologies?
You can find the relevant information in Section 5 - Our overall preferred connections reform design and Section 7 - Further variables and options to align connections reform with strategic energy planning
<i>Nothing further to raise.</i>

8. Do you agree with our approach to managing project attrition between 2025-2030, and 2031-2035, whilst ensuring that the SSEP can deliver maximum benefits to GB consumers?
You can find the relevant information at Section 7 - Further variables and options to align connections reform with strategic energy planning
<i>Bute Energy supports the idea that projects scheduled for 2031-2035 could be moved up to the 2030 connections pipeline to offset this attrition. However, there is a risk that these projects cannot advance promptly because it often takes about six years for an onshore wind development to navigate through the planning and construction phases. Developers are unlikely to begin these processes early on the chance that an earlier grid connection becomes available, especially since development expenditures (DEVEX) are frequently financed through high-interest loans.</i>

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Connections Network Design Methodology

You can find the relevant information in the [Connections Network Design Methodology - Detailed Document](#)

9. Do you agree with the approach to applying the Gate 2 Readiness Criteria and the Gate 2 Strategic Alignment Criteria to the existing queue and future Gate 2 Tranches?

Yes.

10. Do you agree with the approach to managing advancement requests? **p44**

Yes.

11. Do you agree with the approach to reserving Connection Points and Capacity at Gate 1? **p52**

Yes.

12. Do you agree with the approaches to reallocating capacity when 2030 pathway projects and 2035 pathway projects exit the queue?

As per the answer to question 8, there is a risk that these projects cannot advance promptly because it often takes about six years for an onshore wind development to navigate through the planning and construction phases. Developers are unlikely to begin these processes early on the chance that an earlier grid connection becomes available, especially since development expenditures (DEVEX) are frequently financed through high-interest loans.

Gate 2 Criteria Methodology

You can find the relevant information in the [Gate 2 Criteria Methodology- Detailed Document](#)

13. Do you agree with the following elements of this Gate 2 Criteria Methodology?

- a. Gate 2 Readiness Criteria – Land (Chapter 4)
- b. Gate 2 Readiness Criteria – Planning (Chapter 5)
- c. Gate 2 Criteria Evidence assessment (Chapter 8)
- d. Self-Declaration Templates (Chapter 9)

Please insert your answer here for a).

Yes. The land secured requirements appear sensible while allowing for an element of post-gate 2 variation, as is typical during the development phase of a project.

Please insert your answer here for b).

Partly. Bute Energy supports the idea that non-DCO projects do not need to have submitted a planning application to be considered gate 2 ready but must do so by the contractual M1 milestone.

The requirement for a DCO project to have proof of submission and validation is potentially too prescriptive as validation can often take time and is subject to planning inspectorate

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resource. The developer typically has no control over the validation process and we would suggest this is adjusted to 'submission' only.

Please insert your answer here for c). Yes.

Please insert your answer here for d). As per question 13 b), Bute Energy suggests that the planning requirement is adjusted to submission only given that the validation process is often subject to delay outside the developer's control.

14. Do you agree that the alternative route of meeting the Gate 2 Readiness Criteria should be only limited to projects that seek planning consent through the Development Consent Order route?

Yes. It is typical for developers following the DCO planning regime to secure land following planning determination given that a DCO consent typically includes compulsory purchase powers. Such powers are not awarded through other planning regimes and hence, for these, land needs to be secured separately and in advance of a planning application.

Project Designation Methodology

You can find the relevant information in the **Project Designation Methodology - Detailed Document**

15. Do you agree that the categories of projects that we have identified are the appropriate ones to potentially be designated?

Yes.

16. Do you agree with the proposed criteria for assessing Designated Projects?

Yes.

17. Do you agree with the indicative process NESO will follow for designating projects?

The indicative process seems appropriate. However, keeping the process indicative leaves developers with uncertainty in the process. Additionally, certain elements are left undefined e.g.

- Timescale for decision making an unknown.*
- Fees for submitting a designation application are unknown.*
- NESO Designation decision appeal process is undefined.*

The NESO should consider providing clarity on these to ensure that the process and requirements are clear and understandable.

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Additional Questions

18. Do you have any other comments (including whether there was anything else you were expecting to be covered in these documents)?

No.
