

Public

# 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](mailto:box.connectionsreform@nationalenergyso.com)** by **5pm** on the closing date of **2<sup>nd</sup> December 2024**.

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

Respondent Details	
<b>Name</b>	Chris McGee
<b>Organisation</b>	Firstway Energy
<b>Email Address</b>	connections@firstwayenergy.com
<b>Phone Number</b>	+44(0)7849911411
<b>Which category best describes your organisation?</b>	<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 type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input checked="" type="checkbox"/> Other
<b>Is this response confidential?</b>	<input type="checkbox"/> Yes – I do not wish for this response to be shared publicly; however I understand it will be shared with Ofgem

Public

☒ No – I am happy for my response to be available publicly

## 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**

*It makes sense to try and align the processes, however we take a different view on some of the proposed processes.*

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**

**No.** We believe overall **design 3** should be the preferred methodology to move forward with, however the 'ready' criteria should be more onerous than simply obtaining land rights. We believe that projects which have secured full planning permission should be classed as 'ready', and not projects which have simply secured land rights. This will ensure that 'planning ready' projects have undergone a thorough and stringent test of layout design, highways, drainage, ecology, noise, air quality, green belt, landscaping heritage, and environmental impact. Implementing this method will significantly reduce the time required to align the queue to the CP30 pathways.

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**

**Yes.** We believe that projects which have secured full planning permission should be classed as 'ready', and not projects which have simply secured land rights. Obtaining planning permission is not an easy task! Mitigation of material misalignment to the SSEP can only be considered properly once the SSEP data has been released, there is a small risk of this, however the greater risk lies with missing CP30 targets in our opinion. Once SSEP is released (as developers are now aware of it's impending release) then this can be used as a tool to

## Public

*mitigate risks of misalignment to the SSEP. Connections that are 'ready' to move forward and can connect before 2028 should be allowed to do so, in our opinion.*

4. 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.** *We believe this to be a very sensible approach, especially with regards to the technologies which have a significantly increased development/construction timeline.*

## 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**

**Partially,** for section 5 – the overall preferred connections reform design, it would be much more efficient to 'front end' gate 2 readiness to align with planning permission, as opposed to land rights. This will hold more projects at gate 1, thus enabling more time to be spent on projects which have a more likely chance of proceeding to connection. Sites which hold land rights and go on to secure planning can advance to gate 2. This process will also provide a better overall view with regards to capacities in the designated areas.

For section 7 – further variables and options to align connections reform, our only concern would be in relation to lack of 'no upfront attrition built in'. We feel that a minimum upfront attrition of 20% should be built into the overall plan, to take account of all of the risks associated with development.

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**

**Partially Yes,** however a change to the gate 2 readiness criteria should be considered, i.e. to use planning permission instead of land rights.

## Public

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**

*We don't believe so, no.*

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**

*Yes, however we believe that a minimum of 20% attrition should be built in, see previous response above.*

## 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**, however Gate 2 Readiness Criteria should be based on planning permission and not just land rights.

*In the event that the Gate 2 Criteria remains as 'land rights', our preferred strategic alignment criteria would be as per "Alternative 2 – Planning Status" Connections Network Design Methodology (Doc 346666).*

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

**Yes**, however advancement requests should be based on planning status and they should only be considered if sufficient evidence is provided, i.e. reasonable and proper programme, FID confirmation etc.

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

**Yes**, however there needs to be a thorough and transparent process regarding this. Reservation of capacity for undersupply of a specific technology would be considered acceptable, for instance, but not a connection point for an unknown project.

## Public

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

**Yes**

## 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 provision of minimum acreage, red line boundary and Option agreement (with draft lease attached) is a sensible approach. However, we do feel that the minimum acreage requirements for Energy Storage is far too low at 0.0151 per MW, effectively 1.5 acres for 100MW scheme. in our experience when complying with BNG and NFCC Fire guidance the minimum acreage should be 3 acres for 100MW. Also, a 20 year lease is not market standard anymore. We agree that Exclusivity and/or Heads of Terms are not sufficient.*

*Please insert your answer here for b). **Yes** – this is a sensible approach for DCO projects..*

*Please insert your answer here for c). **Yes** – this is sensible for the different types of Users. However, at 8.4 it would be useful to have the DNO/Transmission to sign up to an agreed timeframe for providing confirmation of Readiness Criteria. This is all about getting connected quicker if you have done the right thing on land and planning.*

*Please insert your answer here for d). agreed – very thorough*

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.**

Public

### 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?

**Yes**

Public

### Additional Questions

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

*We feel that a stronger approach to kicking out zombie projects (more strict milestone control) is needed and can be implemented to some of the older projects in the current queue now, why hasn't a concerted effort been applied to removing zombie projects?*

*Based on the current proposals to align with CP30, we anticipate a 12-month delay will occur on strategic investment, at a time when all stakeholders should be aligned to achieve the extremely difficult task of hitting CP30 targets. We constantly hear senior leaders talking about not wanting to delay projects, however the message is not reaching DNOs as they are very reluctant to move forward on any connection in the current queue due to the CP30 uncertainties. We feel that sites which have secured planning before the end of November 2024 shouldn't be subject to the CP30 delays, and should be permitted to connect, assisting with achieving the CP30 goal. NESO should be making the most of the opportunity with sites that have secured planning and want to connect now.*

*Moving forward, we feel the capacity figures in CP30 are low when consideration is given to the reliance on unproven technologies. Our expectation is that the values should be higher due to unproven technologies proposed and delays to nuclear coming online.*

*The CP30 data release needs much more specific granular information to be shared, in particular information on technology capacities and their locations, such as GSP level etc, in order to make an informed decision on investment moving forward.*