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# Connections Reform

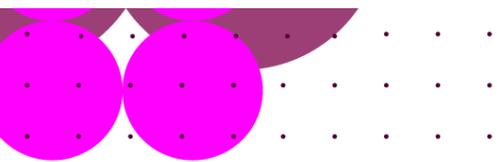
## Consultation Response Proforma

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](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.

<b>Respondent Details</b>	
<b>Name</b>	Nick Bohane
<b>Organisation</b>	Community Energy South
<b>Email Address</b>	nick.bohane@communityenergysouth.org
<b>Phone Number</b>	07803620560
<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 <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**

Commented [RE(1)]: Link needed

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**

*Please insert your answer here*

Community Energy South is one of the principal capacity builders for community energy in England working closely with our trade and advocacy body Community Energy England. We support around 50 community energy groups.

We believe that shared ownership will be a key enabler for the Clean Power 2030 mission.

By shared ownership we mean a situation when a community energy group is given an opportunity to make a financial investment into a local renewables project by the developer or commercial owner, in other words enabling the local community to take a community share in a project and thereby sharing benefits.

Shared ownership models have the potential to be a critical element to achieve the 8GW mission as it increases local acceptance, buy-in to and public engagement with net zero.

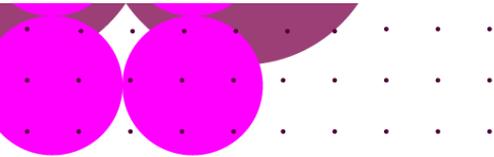
**For this reason, we propose that locally owned and shared ownership projects are given the priority in any new connections queueing system.**

As NESO comments in its Clean Power 2030 Report, "engaging and bringing along local communities that host energy infrastructure will remain key, both in enabling delivery and maintaining widespread public support for the clean power mission. (...) Community consent and maintaining public support is vital to the delivery of net zero in Great Britain. Those asked to host energy infrastructure should continue to be effectively engaged throughout the development process, even as it accelerates, and should feel tangible benefit from the critical role their areas play in building a clean, secure and low-cost electricity system."

Given the large existing connections queue, we believe that shared ownership models are a key enabler to achieving the Government's target of 8GW of local and community owned power generation. As suggested by Regen in its recent report on Shared Ownership ([LINK](#)), "Shared ownership (based on good engagement and meaningful collaboration with communities) can increase local acceptability of renewable projects, helping to streamline and speed up the development process by reducing potential local resistance. Given the masses of new infrastructure required for net zero energy, this can help lay the foundations for more robust public support. It can also boost public engagement with net zero overall through democratic participation and giving citizens and communities a more direct stake and benefit in projects on their doorstep."

We are happy to engage with NESO on the implementation details, for example, the qualifying levels/percentage of the community share.

At a high level, we suggest two possible routes to securing the Government's community owned power generation target by 2030:



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- As an additional factor in determining if projects have Strategic Alignment with the pathways within Government's CP30 Plan
- Through the Project Designation Methodology.

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**  
*Please insert your answer here*

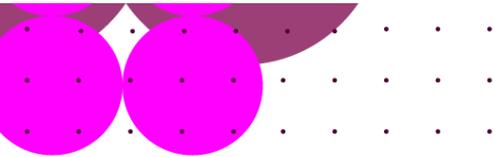
3. Do you think all 'ready' projects should be included in the reformed connections queue (overall design 3)? If so, how would you propose that we mitigate risks to consumers or developers of material misalignment to the SSEP?

You can find the relevant information in **Section 6 - Assessment of alternative design for connections reform**  
*Please insert your answer here*

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**  
*Please insert your answer here*

Implementation Questions



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

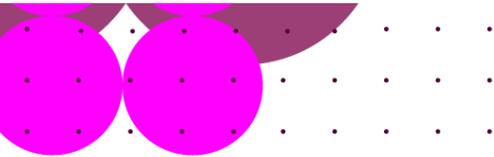
Commented [RE(2)]: Link needed

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 <b>Section 5 - Our overall preferred connections reform design</b> and <b>Section 7 - Further variables and options to align connections reform with strategic energy planning</b>
<i>Please insert your answer here</i>

6. Do the methodologies deliver our preferred options against each of the variables?
You can find the relevant information in <b>Section 3 - Overview of framework of codes and methodologies for connections reform</b>
<i>Please insert your answer here</i>

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 <b>Section 5 - Our overall preferred connections reform design</b> and <b>Section 7 - Further variables and options to align connections reform with strategic energy planning</b>
<i>Please insert your answer here</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 <b>Section 7 - Further variables and options to align connections reform with strategic energy planning</b>
<i>Please insert your answer here</i>



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**Connections Network Design Methodology**

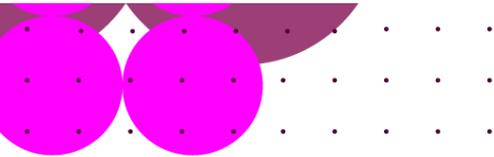
You can find the relevant information in the **Connections Network Design Methodology - Detailed Document**

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?
<i>Please insert your answer here</i>
As per our answer to Question 1, we suggest that “significant local and shared ownership” is added as a factor in determining queue position in the Gate 2 to Whole Queue process and subsequent Gate 2 processes.

10. Do you agree with the approach to managing advancement requests?
<i>Please insert your answer here</i>

11. Do you agree with the approach to reserving Connection Points and Capacity at Gate 1?
<i>Please insert your answer here</i>

12. Do you agree with the approaches to reallocating capacity when 2030 pathway projects and 2035 pathway projects exit the queue?
<i>Please insert your answer here</i>



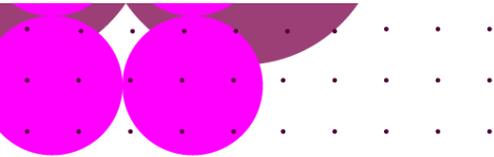
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**Gate 2 Criteria Methodology**

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)
<i>Please insert your answer here for a).</i>
<i>Please insert your answer here for b).</i>
<i>Please insert your answer here for c).</i>
<i>Please insert your answer here for d).</i>

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?
<i>Please insert your answer here</i>



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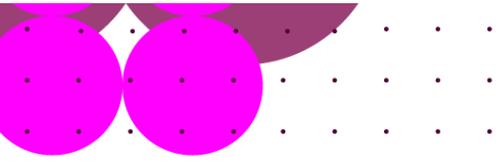
**Project Designation Methodology**

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?
<i>Please insert your answer here</i> As per our answer to Question 1, we believe project designation is a potential route to securing the achievement of the Government’s community owned power generation targets.

16. Do you agree with the proposed criteria for assessing Designated Projects?
<i>Please insert your answer here</i>

17. Do you agree with the indicative process NESO will follow for designating projects?
<i>Please insert your answer here</i>



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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)?

*Please insert your answer here*