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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	Eibhlin Norquoy
Organisation	Community Energy Scotland
Email Address	Eibhlin.norquoy@communityenergyscotland.org.uk
Phone Number	07919305843
Which category 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 type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input checked="" 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**

We agree the connections process should be aligned to Government's Clean Power 2030 Action Plan. However, it is also important that it is in alignment with the Government's plans for GB Energy and the Local Power Plan. The role of community energy must be recognised and prioritised in meeting the government's 2030 clean power targets; community energy must not be sidelined or disadvantaged in the process of rapid acceleration of clean energy generation.

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**

We believe there is a high risk that future wholly community-owned projects will be negatively impacted and therefore community ownership of energy. This would threaten the Government's objectives to grow local economies and level up the country, because community-owned energy transforms communities from being grant-dependent to income-generating. The revenue generated by community-owned wind farms, hydro or solar builds community wealth and helps meet local need, with positive outcomes across housing, poverty, wellbeing, net zero and islands connectivity.

The Minister for Energy at the Department for Energy Security and Net Zero has stated that the UK Government is "committed to increasing community ownership" of energy, but without change to overall design 2, this objective is at risk.

This can be overcome with the addition of a community-owned Project Designation criteria and removal of the Gate 2 Readiness Criteria for land minimum acreage requirement for embedded generation of less than 50MW. If these changes are made within the CNDM and project designation methodology, then we can support overall design 2.

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?

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

N/A

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**

We believe that the reformed connections queue from 2031 to 2035 should include capacity reservation for projects not yet known to be able to make use of GB Energy / Local Power Plan funding for community and local projects so that GB Energy is an enabler of projects ahead of 2035.

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**

N/A

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**

N/A

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**

The Minister for Energy at the Department for Energy Security and Net Zero has stated that the UK Government is “committed to increasing community ownership” of energy. The methodologies create an unnecessary barrier against this commitment. This can be overcome with the addition of a community-owned Project Designation criteria and removal of the Gate 2 Readiness Criteria for land minimum acreage requirement for embedded generation of less than 50MW.

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Community-owned energy transforms communities from being grant-dependent to income-generating. The revenue generated by community-owned wind farms, hydro or solar builds community wealth and helps meet local need, with positive outcomes across housing, poverty, wellbeing, net zero and islands.

Community energy also aligns firmly with an established definition of sustainable development: “development that maintains or enhances economic opportunity and community well-being while protecting and restoring the natural environment upon which people and economics depend.”

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

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?

We do not support alternative 1 shown on page 82 for the reordering of the queue as part of the Gate 2 to Whole queue process because it does not consider how ready the project is to connect with regards to planning. In alternative 1, the methodology could result in a project with planning consent being put in phase 2 while a project that hasn't submitted a planning application could be put ahead of it in the queue in phase 1. While projects connecting in 2030 may not yet have planning consent, we believe that those that do have planning consent should be given priority in phase 2 of the Gate 2 to Whole queue process.

We believe preservation of original relative queue order within Phase 2 of the Gate 2 to Whole queue process is less critical. We also believe it is not reasonable to use planning status as a readiness metric for the 2031–2035 period, as some of those projects will not be connecting for several years and therefore should not be expected to have already obtained planning.

We strongly disagree with using the Energy Density Table as defined under CMP427 to determine the minimum acreage requirement of the Gate 2 Readiness criteria for embedded projects of less than 50MW. Unless this requirement is removed, we cannot agree with the

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approach to applying the Gate 2 Readiness Criteria and the Gate 2 Strategic Alignment Criteria to future Gate 2 Tranches.

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

Yes

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

We agree with the concept of reserving for undersupply against the CP30 Plan pathway(s) to 2030.

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)

We strongly disagree with using the Energy Density Table as defined under CMP427 to determine the minimum acreage requirements. The Energy Density Table as defined under CMP427 is not appropriate for generators of less than 50MW.

A project that comprises a single onshore wind turbine requires sufficient land for an access track, a laydown area, turbine base and associated hard standing, and substation. A single 2.5MW onshore wind turbine which is being constructed required only 13 acres of land. Using the Energy Density Table would have required 19.23 acres of land to have been secured which is unnecessarily onerous.

The practical land requirement for a single 6MW wind turbine is nowhere near the minimum acreage requirement as set out in The Energy Density Table as defined under CMP427 (6MW x 7.6929 acres per MW for onshore wind = 46.16 acres). The proposed Gate 2 Criteria Methodology for land would effectively remove the ability for single onshore wind turbine projects to be considered for a connection prior to 2035. We know of a 6MW project that is in the existing queue, has planning permission and meets all of the Gate 2 Readiness Criteria except the minimum acreage requirement. By using the Energy Density Table as defined

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under CMP427 in the assessment of embedded generators less than 50MW, the methodology will remove a ready to connect project from being able to connect which goes against the principle of the connection reform.

We believe that the Gate 2 Readiness Criteria of minimum acreage requirement should be removed from embedded generators of less than 50MW. 50MW is the threshold of small embedded generators in England and Wales. As the land requirement for a project is unaffected by the country it is located, we propose this change should be on a MW basis rather than aligning with the varying existing definitions of small embedded generator across North of Scotland, South of Scotland, England and Wales.

N/A

As stated above, the land minimum acreage for onshore wind technology as set out in the Energy Density Table is not appropriate for onshore wind turbine projects of less than 50MW.

N/A

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

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?

We agree with the categories of projects but also propose an additional category "to materially increase wholly community-owned energy projects".

Community energy is typically characterised by grassroots action, where a community (either a community of place or of shared interest) comes together to design, implement, and manage a renewable energy asset or project primarily for the benefit of the community it is operating within rather than individual gain. This might be a community energy generation project, such as a wind turbine or solar panels, or a heat, retrofit or transport scheme. These are often driven by a shared mission to deliver environmental, social and economic value for a specific place, with democratic input and governance (Brummer 2018; Creamer et al. 2020; Stewart 2021; Hanke et al. 2021).

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Wholly community-owned energy projects provide much larger societal benefits than generators that are not wholly community owned. On average, revenue to communities from 100% community-owned wind farms is 34 times higher than community benefits from private wind farms in Scotland.

Adding a community-owned Project Designation criterion would have the following effects:

- It would help deliver on the new UK Government's stated aim of increasing the proportion of community energy in the proposed new 'mixed economy' of energy generation. Indeed, without a change such as we outline in this response, the government aim will be impossible to deliver in the current grid connection environment even after implementing the proposed Connections Reform.
- It would remove the current inequity which prevents community-owned energy companies from competing on a level playing field with corporate developers when trying to develop their projects in a context of grid scarcity and hence constrained grid access (as illustrated by the example of community projects in the Western Isles unable to get firm access to the grid despite the recent announcement of a 1.8GW upgrade).

In the case of the Western Isles, over the past decade, there has been real frustration within the community sector at the lack of development potential due to the lack of grid infrastructure. SSEN's announcement that a 1.8GW interconnector will be constructed and energised by 2030 had the potential to alleviate this problem. However, this capacity was rapidly allocated to developers and now appears to be full. This will likely require any future community applications that are approved to have constraints applied. Some generators have already been moved from firm connections to non-firm connections after holding space on the grid for many years. This leaves no space for additional community projects or for current community generation projects to be repowered at a larger scale, putting the future of community generators in the Outer Hebrides at risk.

Community Generators have repeatedly been shown to deliver many times more value, return locally and have considerably more local acceptability and support when compared to embedded generation in general. Adding the criterion recognises the additional benefits these generators bring to society through socialising the wealth and other benefits generated by the renewables.

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

We believe an additional criterion should be added for a new category of designation: wholly community-owned energy projects.

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

We would like to see more commitment to a timescale for a designation decision as this will impact on the Gate 2 strategic alignment criteria assessment and if managed poorly, could result in an additional 6 month delay while the project waits to apply to Gate 2 again along with a financial impact due to applying in the Gate 2 window twice.

We would like to see more information on the price of a designated application.

We would like clarity on who is involved in the consultation within the indicative process and timeline for designating projects.

Additional Questions

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

N/A