

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	
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<b>Which category best describes your organisation?</b>	<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
<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

## Public

### 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

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. But we would like to highlight that careful considerations should be made to ensure that prioritising projects short term to meet CP30 does not endanger the continued decarbonising of the power system after 2030.*

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**

*As set forth in our answer to Q2 we, on balance, agree that the overall design 2 provide the best pathway going forward. A weakness of overall design 2 is that it heavily relies on the future SSEP, yet to be developed, and a rigidly managed connection process. After 2030 we believe that if the SSEP is complemented by price/investment signals this could ensure the correct technology mix and location and therefore that overall design 3 where all 'ready' projects are included could be a possible alternative.*

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. Please also see answers Q2 and Q3.*

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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**

*No answer*

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**

*No answer*

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**

*No answer*

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**

*No answer*

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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?

*For Q9 to Q12 please see response from RenewableUK / Scottish Renewables*

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

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

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

## Gate 2 Criteria Methodology

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

<p>13. Do you agree with the following elements of this Gate 2 Criteria Methodology?</p> <ul style="list-style-type: none"> <li>a. Gate 2 Readiness Criteria – Land (Chapter 4)</li> <li>b. Gate 2 Readiness Criteria – Planning (Chapter 5)</li> <li>c. Gate 2 Criteria Evidence assessment (Chapter 8)</li> <li>d. Self-Declaration Templates (Chapter 9)</li> </ul>
<p>a) <i>We understand that for an Offshore Wind Farm development this readiness criteria will be met if the OWF has signed an AfL with The Crown Estate or Crown Estate Scotland. For onshore developments we note that NESO will assess the <b>minimum acreage requirement</b> for a development using the Energy Density Table defined under CMP427. For technologies / developments not mentioned in the table or where the developer can provide evidence for a different minimum acreage requirement, it is important that NESO on a case-by-case basis can use its discretion to accept that the readiness criteria is met. It should be noted that the agreements with landowners are, in many cases, confidential and this must be respected. Therefore there needs to be flexibility regarding the level of information required to demonstrate land ownership/ownership of rights to implement the project and the rules surrounding this cannot be rigid e.g. it may not be possible to forward an Option Agreement to National Grid and National Grid must be able to accept the Declaration Letter as sufficient evidence.</i></p>
<p>b) ...</p>
<p>c) ...</p>
<p>d) ...</p>

<p>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?</p>
<p><i>The alternative route of meeting the Gate 2 Readiness Criteria should be open to projects outside of the Development Consent Order route but only by exception. For example, circumstances may arise where a project progress a compulsory purchase order application to acquire the land. In these instances, it may be more appropriate for that project to proceed with the alternative route.</i></p>

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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?
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No answer
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16. Do you agree with the proposed criteria for assessing Designated Projects?
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No answer
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17. Do you agree with the indicative process NESO will follow for designating projects?
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No answer
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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 answer*