

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.

<b>Respondent Details</b>	
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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

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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 with the principal of an assessment of the strategic importance of projects when determining their queue position and connection date. However, we have some concern over the extent to which this is proposed to be applied, our concerns include;

- Exclusion of projects that are ‘ready’ but outside of the CP30 plan – as per the preferred overall design ‘2’
- Capacity/technology limits by region and/or voltage, we see this as an unnecessary limitation which may conflict with actual network capabilities and availability of land suitable for development
- Equity of treatment to both Transmission and Distribution connection customers – these proposals focus on the Transmission process and therefore do not treat all customers equally, for example;
  - Statement of Works/Project Progression process is not fit for purpose but remains unchanged
  - Dates used to determine queue position - the application/acceptance date of DNO contracts is not intended to be used

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 disagree with the proposed overall design 2 model, as it will impose measures that risk capping progress. Solar energy, in particular, is quick to deploy and crucial for achieving CP30 targets. Efforts should focus on utilising this potential rather than creating barriers that hinder progress.

NESO’s recommendation of 47.4GW of solar by 2030 raises significant concerns, as this figure appears overly conservative and risks becoming a de facto cap on solar deployment in Great Britain. Such limitations would severely hinder the clean energy transition.

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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 prefer overall design 3 as this, in our view, is the option of least regret of the 3 options considered. We recognise the risk of committing network resources to projects that are 'less needed' than others but feel this risk is insignificant compared to the risk of introducing uncertainty and limitations to developers.

Ultimately, we feel that although the current connections queue might suggest there are more projects than needed to fulfil the most ambitious net zero goals we suspect the reality is quite different and that there is unlikely to be a significant surplus of projects that could actually be constructed.

The short term goal (i.e. 2030) should be to clear the path for all viable and ready to build renewable energy projects, with the TMO4+ and Queue Management measures used effectively to ensure slow moving or 'zombie' projects do not get in the way.

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 do not see the benefit of this time horizon. The 'horizon' that connection queues should consider is that of the network capacity – existing and following network reinforcement. Therefore TO's and DNO should consider the forecast network capacity and the queue of connections and align the queue, in order of readiness, with the network capability.

The proposals attempt to manage development of projects to ensure they align with the SSEP once it exists – we believe this is the wrong approach and that the purpose of the SSEP is to ensure network operators can invest in their networks in a timely manner to enable renewable development, as is required by both the industry/markets that create renewable energy projects and GB's clean power targets as these are likely to be closely aligned.

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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**

If progressing with these proposals, the preferred options seem to be well aligned with the CP30 plan.

Variable 7 - 'Optimal use of the network' deserves further consideration as it may demonstrate how a 'whole system' approach could be taken, with consideration of transmission and distribution connection options made together in some cases.

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 response

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 feel the Transmission and Distribution interface has been neglected in the connection reforms and is not addressed by the methodologies. There had been an attempt to address this with the DFTC proposal which has now been dropped as it did not effectively address the issues.

The potential for inequity between transmission and distribution connections remains high until the Statement of Works/Project Progression process is reformed. The CP30 and SSEP are 'whole system' plans, but the way that transmission and distribution capacity is assessed, and the interaction between network operators, does not yet achieve a 'whole system' process.

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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**

We do not agree that there should be any limit to projects further down the queue benefiting from attrition. To limit this would stifle new project development and risk the pipeline of deliverable projects disappearing before net zero goals are reached.

### 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 agree to this approach as a method of reordering the queue, but as already stated, not to the limitation of how many projects are permitted to connect where network capacity exists/will exist.

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

We do not agree that advancement from the 2035 pathway to the 2030 pathway should not be possible.

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

No response

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

We generally agree with the approaches but feel there should be a further 'readiness' check to ensure that the project that benefits from the capacity is not likely to also terminate/withdraw from the queue and require the capacity to be reallocated again. This could be mitigated by either a readiness criteria higher than that of Gate 2 being required to receive reallocated capacity or a NESO review involving prospective beneficiaries to decide on the project most ready to connect.

**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). Agree*

*Please insert your answer here for b). Agree*

*Please insert your answer here for c).*

We agree with the principals of this but have some concern about Embedded Generators Readiness Declarations being tied to the Transmission Evaluation Application submission from the DNO, until at least DNOs are proven to consistently submit these on time and accurately.

We would like to see Embedded Generators be given an opportunity to notify NESO directly of their Gate 2 readiness (which the NESO can then reconcile with DNO submissions) , in addition to notification to the DNO. Or perhaps a system that provides full visibility to users of progress of Gate 2 submissions and assessments – so generators are not left wondering if the DNO has acted on their behalf.

*Please insert your answer here for d). Agree*

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?

No response

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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?

We would like to see more refined definitions of ‘new technologies’ and ‘projects with long lead times that may be needed’ as the current definitions are too ambiguous and do not give users the ability to measure the risk of losing a queue position to a designated project.

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

No response

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

No response

### Additional Questions

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

The fact that DNOs have been largely excluded from this process is troubling, as it has primarily been a transmission-led reform. Now, with NESO’s reforms relying heavily on DNOs, there is significant concern regarding their capacity and the quality of service they have provided to date, especially given the resource challenges they face.

We also feel that there is a great deal of work that could be completed by NESO and DNOs to properly interrogate the current connections queue and speak to the contracted customers about their projects, this could reveal a very different reality of the pipeline of ‘real’ projects in the UK, and may therefore highlight the risk to the supply of new projects by adding uncertainty to investors/developers.