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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	Jean Lewis
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Which category best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" 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 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**

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

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**

no

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

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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**

Yes, although we would question why embedded demand has been excluded from scope

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**

Yes

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 do not see in the Consultation Document where you set out the "key policy areas". However we would have expected a cost-benefit analysis of the proposals.

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 are unclear why alternatives such as allowing a contingency were not considered. Nor why capacity shortfalls within a DNO area cannot be filled from the same or adjacent transmission zones, or the IDNO networks within it (or vice-versa).

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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?

Yes we agree with the approach in general but there is much more detail needed. We are concerned that the CNDM is stated to be an "Overview" of the approach, it needs to be the methodology to be followed. For an IDNO the required processes and interactions need to be set out more clearly and where there are differences between IDNOs and DNOs with Distribution Service Areas a clear rationale of why these are appropriate and not discriminatory for them and/or their customers.

In section 5.7(1) point 6 notes that "Relevant TO/DNO identify any network limitations preventing advancement (prior to detailed network study)" This is how we understand the process (ie with the DNO/IDNO working with NESO and TOs on advancement opportunities), which was discussed in the CMP434/435 working groups. However we note that this conflicts with the statement at the bottom of page 8 and section 8.3 of the Gate 2 Methodology where it is implied that the DNO/IDNO has to "agree" an embedded project's request for advancement prior to application (which we think is wrong).

Section 5.9.1 needs to clarify if the reference to "Relevant Embedded Generation" is intended to include Large embedded (we understand that in the CUSC definition, as amended by CMP434 it will not, even though today's CUSC does include such projects). And if not, who is undertaking the exercise for Large embedded projects?

Section 5.9.2, as a drafting point, we don't think you mean "Users" in this case it is "Developers" (of the embedded capacity), unless you just mean BEGA or BELLA holders. For clarity, add at the end "NESO will be conducting the exercise in Section 5.7.1 in this case" (assuming that is what you mean).

Section 5.19, as above, this needs to clarify if the reference to "Relevant Embedded Generation" includes Large embedded, and if not how the reassessment GSPs and/or new SGTs for BEGA and BELLA holders is to work.

Section 5.19.2 needs clarifying, is this the order of priority for re-assessment? In case b), surely it is only the case that reassessment is needed if some or most of the Project progressions relate to projects removed from the queue?

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

Yes in general, but our specific comments:

Section 5.25.7, our understanding from the discussions in CMP435 and the resulting CUSC drafting, was that if an embedded user held a BEGA there may be an opportunity to retain it in Gate 1.

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

This does not seem relevant for DNOS and IDNOs, but concerning for our customer's whose own projects may be delayed if capacity, which they could use, is reserved for others. The process and criteria by which DNOs and IDNOs would identify projects suitable for Reservation (section 6.3.2) is unclear, the text refers to an "embedded project which would benefit from connection point and capacity reservation", we would say that all or many projects would benefit from it, but how do they get it?

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

For embedded projects it is not clear what process is envisaged. The hyperlink in section 7.18.1 takes you to the ENA website which describes the arrangements for Technical Limits for non-firm connections. (<https://www.energynetworks.org/publications/grid-supply-point-technical-limits-for-accelerated-non-firm-connections>) It does not describe the Capacity Reallocation Process for Distribution, not do we understand what you mean by an "existing" process in this regard. Is this an incorrect reference or is there more detail yet to be added? If it relates to Technical Limits only, where are the details of the processes for the "equivalent Design Variation" which referred to in section 5.19.9?

For sections 7.18.3 and 7.18.4, why are these provisions not also included in the section on Transmission (7.17)?

In section 7.18.5 can you explain what you mean by "where relevant" (and conversely, what happens when it is not relevant).

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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"> 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)
<p>a). Yes</p>
<p>b). Yes</p>
<p>c). <i>Yes in principle but we don't see how the timing shown in the box on section 8.5 works in practice ie how can the Gate 2 Strategic Alignment Criteria checks be undertaken and outcome notified to Users within this period? As we understand it, Users (and Developers making applications to the DNO or IDNO) can make new applications right up until the end of the window and the initial checks and Strategic alignment will take some time. Furthermore, DNOs and IDNOs have an additional period to submit their matching BCA applications, so they will not be in a position to notify their customers at this time.)</i></p>
<p>d). <i>No, we would like to see the proposed templates for submission by Developers to the DNO/IDNO for Relevant Embedded Generation projects before commenting.</i></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>We don't have a view on this.</i></p>

Project Designation Methodology

You can find the relevant information in the [Project Designation Methodology - Detailed Document](#)

<p>15. Do you agree that the categories of projects that we have identified are the appropriate ones to potentially be designated?</p>
<p><i>We don't have a view on this, save to note that in section 3.3 there is a reference to "the regional distribution networks, managed and operated by Distribution Network Operators (DNOs)". We would like to see this expanded to explicitly include the networks managed and operated by IDNOs.</i></p>

<p>16. Do you agree with the proposed criteria for assessing Designated Projects?</p>
<p><i>We don't have a view on this.</i></p>

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

Additional Questions

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

In the CNDM, section 9.1 of discusses Roles and Responsibilities. As an IDNO, we do not understand the reasons for all of the proposed differences between a DNO with a Distribution Service Area (section 9.4) and an IDNO (section 9.5). In particular why are items 3, 4 5 and 7 of section 9.4.1 not replicated in 9.5.1? Has this approach been discussed with IDNOs generally, for we are not aware of such discussions and are concerned that IDNOs appear to have been somewhat of an afterthought in this area.

More generally, given these roles IDNOs, should have been more deeply involved in the process of developing the Methodologies in general and the CNDM in particular.

Also as a drafting point, section 9.4 should be headed "Role of DNOs (other than Transmission Connected IDNOs) in the CNDM, and "Users" in Section 9.5.1 should be "Developers".

More generally both sections 9.4 and 9.5 need to distinguish the different processes followed by Large embedded generators and how that fits with the processes in 9.2 and 9.3.

In the Gate 2 Criteria methodology, every reference to "DNO" is followed by "/Transmission Connected IDNO" – it would be much simpler if, at the outset it was stated that "References to DNOs also means Transmission Connected IDNOs, except where otherwise stated". Common terminology and strict use of CUSC definitions would also be helpful.

The note at the bottom of page 8, as well as section 8.3 states or implies that the DNO/IDNO has to "agree" an embedded project's request for advancement prior to application. This will not be possible in all circumstances since advancement may be dependent on other embedded projects being removed from the queue, which only happens following completion of the Gate 2 Criteria assessment. Whilst in some case it may be clear that advancement is not possible, the same is likely to apply for Directly Connected plant, but in that case there is no obligation on the User to agree with the TO that advancement is possible. Given that there are around 7000 embedded projects at the current time, expecting all DNOs and IDNOs to "agree" advancement requests is not only a huge administrative burden but unfair, inappropriate and unnecessary. We also saw in CDNM section 5.7(1) point 6 that "Relevant TO/DNO identify any network limitations preventing advancement (prior to detailed network study)" which is how we understand the process (ie with the DNO/IDNO working with NESO and TOs on advancement opportunities, after determination of the Gate 2 compliant queue). This was also as discussed in the CMP434/435 working groups, although we recognise that such input was not binding in NESO in preparing its Methodologies.