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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	Damian McCabe
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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 – ICP, IDNO and Grid Consultancy
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, we agree that the best way forward with the wider connections reform is to align the Connections Reform process with the Clean Power 2030 advice issued to Government and any further direction issued by Government. However, more detail is required regarding the detail of Clean Power 2030 such as how technology pots have been set and the relevant methodology for reviewing these pots.

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**

Although out of scope, clarity should be provided how embedded demand projects will feed into the reformed queue and the wider process. Further information regarding how DNO Modification Applications will be processed and managed would provide clarity to all embedded projects but particularly to embedded demand customers, that may require Transmission Impact Assessments (TIA). The new process must allow DNOs to continue to submit and process ModApps for their embedded customers. Currently, if an embedded project required a ModApp, the lack of clarity may encourage the project to apply directly to NESO due to uncertainties regarding how they will be treated and the common time delay that is associated with DNOs submitting their applications to the TO/NESO.

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 Comment

4. Do you agree that the reformed connections queue should initially focus on the 2035-time horizon?

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You can find the relevant information in **Section 4 – Key building blocks for aligning connections to strategic energy plans**

A full queue focused on the 2035 horizon and aligned to Clean Power 2030, could potentially delay connection dates for embedded demand beyond 2035. This highlights the importance of clarity on how embedded demand will be treated in this reformed queue that is aligned to CP30.

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 comment

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, although due to the overlap of application windows, further clarification should be provided on how Gate 2 Applications in Window 2 onwards will be assessed while NESO is awaiting customers from the previous windows to accept their offer. Any offer issued in Window 1 can be accepted between M10 and M12. However, at the same time the Gate 2 Design Process will take place from M10 to M14. Will the design process for Gate 2 Offers assume that all offers will be accepted or will the detailed design not take place until after the acceptance deadline has been passed for the previous window as this overlap repeats itself each application window.

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**

Although it is out of the scope of the wider connections piece, as a DNO submitted ModApp is a transmission related process, there should be further clarity from NESO regarding how DNO submission will work and how they will fall into the queue. As embedded demand customers are out of scope, they will witness a high impact if the existing process is required to change

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Additionally, as stated before, if an embedded project required a ModApp, the lack of clarity may encourage the project to apply directly to NESO due to uncertainties regarding how they will be treated and the common time delay that is associated with DNOs submitting their applications to the TO/NESO

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 comment.

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?

No comment

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

No comment

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

No comment

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

Yes, if a 2030 Pathway project exits the queue it is sensible that a Phase 2 project advanced to Phase 1. However, this will only have the desired outcome if Phase 2 projects are ordered by planning status (as per NESOs proposal). This would allow the projects further in their development to contribute to the clean power targets. However, clarification is required regarding how demand projects will be reallocated as the likelihood of a ‘like for like’ scheme is low. i.e. why should a bay allocated to a phase 1 solar project not be reallocated to a phase 2 embedded or directly connected demand project?

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?

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- 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).

No Comment

Please insert your answer here for b).

No comment

Please insert your answer here for c).

No comment

Please insert your answer here for d).

No comment

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 Comment

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?

No comment

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

Yes, although without detailed knowledge of the relevant network, developers may be unaware if they meet any of the criteria for Project Designation such as security of supply, system operation and reducing constraints.

This may require input from NESO or the Host TO indicating to the developer that they should apply for designation.

For Embedded Projects, this may require the Host DNO providing support to the developer in the form of seconding the project designation application. As the project may not reduce constraints at Transmission Level but would provide a benefit to the distribution network.

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

No comment

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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. The main area that is not covered in these documents include DNO modification applications which we covered in Q7.

We would also welcome further clarity on thresholds for embedded demand connections and when they require assessment by NESO and the TO's. How should large housing schemes be dealt with? (i.e. should an application for 10MW of housing be viewed as a 10MW application or as 3,000-4,000 separate housing connections that sit below any transmission assessment threshold). We are seeing the transmission capacity and queuing issues having a huge impact on new housing sites- NESO may be unaware of this as the housing developers are typically not accepting the DNO offers, and the projects sit on hold.