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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	
Organisation	
Email Address	
Phone Number	
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 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 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**

Commented [RE(1)]: Link needed

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 ~~support are supportive of~~ improving the grid connection process to accelerate the deployment of offshore wind. Both the NESO CP30 advice and ~~the~~ OEUK-commissioned AFRY report agree that delivering offshore wind is critical for the government's objective of clean power 2030. The current pipeline of offshore wind is just enough to meet those CP30; therefore, projects can't be delayed.

The process must ~~account for the different pathways take account of the different pathway to~~ 2030 and be included in a larger plan to achieve 2050 Net Zero objective.

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**
The effort has to be maintained beyond 2030 as power demand is likely to increase beyond 2030. The plan shouldn't lead to ~~a~~ suboptimal solution beyond 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**
The reform should lead to a steady pipeline of projects that meet CP30 and pave the way to 2050.

~~Offshore wind developers need more certainty on grid connection timing. Project uncertainty translates into higher risk, leading to higher capital costs. It would put upward pressure on the CfD price and, therefore, induce a cost to the customer. Offshore wind developers need more certainty on grid connection timing. Project uncertainty translate in higher risk leading to~~

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higher capital cost. It would put upward pressure on CfD price and therefore induce cost to customer.

Furthermore the supply chain needs to have visibility into the portfolio of work for several years to trigger an investment decision, in order to scale up needs to have visibility of portfolio of work for several year to trigger an investment decision.

4. 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**

Consideration should be given to the project development timeline and long-term objective while still leaving room for technological innovation. Therefore, the queue system should be flexible enough to allow new technologies, different types of configurations, or system optimisation. The UK energy system is a hybrid system in transition, with the share of electricity increasing and the gas system progressively transforming from natural gas to natural gas + CCUS and hydrogen. The queue system reform should allow some flexibility so that generators can decide to produce electrons or hydrogen based on market forces.

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Implementation Questions

You can find the relevant information in the **Great Britain's Connections Reform: Overview Document**

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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**

Offshore wind projects are complex projects needed to pass many a lot of milestones. It they will benefit from uncertainty reduction. The reform should aim to deliver shorter connection timelines and more certainty on the grid connection timing for offshore wind projects.

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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
<i>Please insert your answer here</i>

Commented [MN3]: Do we plan to answer?

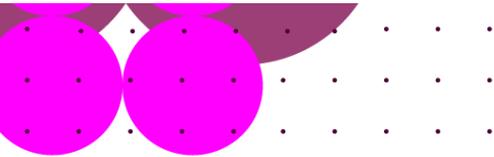
7. Are there key policy areas that are not covered by our preferred options against each of the variables or that would not be delivered by the methodologies?
You can find the relevant information in Section 5 – Our overall preferred connections reform design and Section 7 – Further variables and options to align connections reform with strategic energy planning
<i>The reform should consider supply chain readiness to deliver the projects ensure the projects can be delivered. It should be coordinated with the UK Industrial strategy to support the UK's local supply chain.</i>

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
<i>NESO should review the historical track record of project delivery to estimate the level of attrition and include it in the consideration for managing the queue.</i>

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?



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NESO should avoid causing extra challenges or delays to the offshore wind projects. NESO should avoid causing extra burden or delays on the offshore wind projects.

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Commented [MN4]: Can you elaborate on this?

10. Do you agree with the approach to managing advancement requests?
Please insert your answer here

Commented [MN5]: Do we plan to answer?

11. Do you agree with the approach to reserving Connection Points and Capacity at Gate 1?
Please insert your answer here

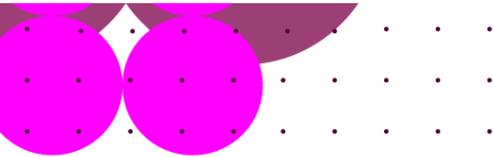
Commented [MN6]: Do we plan to answer?

12. Do you agree with the approaches to reallocating capacity when 2030 pathway projects and 2035 pathway projects exit the queue?
We support queue management that avoids gap creation and increases uncertainty on grid connection timing. We are supportive of queue management that avoid gap creation and increase uncertainty on grid connection timing.

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Gate 2 Criteria Methodology

You can find the relevant information in the **Gate 2 Criteria Methodology- Detailed Document**



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<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><i>Please insert your answer here for a). consideration on offshore wind as it is undersupplied – the grid reform should accelerate the process and not create more burden on developers.</i></p>
<p><i>Please insert your answer here for b).</i></p>
<p><i>Please insert your answer here for c).</i></p>
<p><i>Please insert your answer here for d).</i></p>

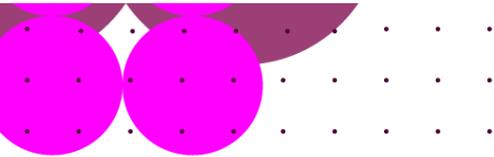
Commented [MN7]: Do we plan to answer these?

<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>Please insert your answer here</i></p>

Commented [MN8]: Do we plan to answer?

Project Designation Methodology

You can find the relevant information in the **Project Designation Methodology – Detailed Document**



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15. Do you agree that the categories of projects that we have identified are the appropriate ones to potentially be designated?
NESO should keep room for innovative or disruptive technology that may appear beyond 2030.

16. Do you agree with the proposed criteria for assessing Designated Projects?
Please insert your answer here

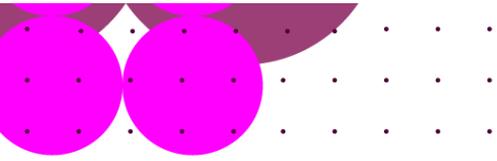
Commented [MN9]: Do we plan to answer?

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

Commented [MN10]: Do we plan to answer?

Additional Questions

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



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Please insert your answer here

Commented [MN11]: Do we plan to answer?