

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@nationalenergyiso.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	Simon Ludlam
Organisation	MaresConnect Limited
Email Address	simon.ludlam@maresconnect.ie
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 checked="" 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**

No response, see responses to questions 13, 14 and 18.

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**

No response, see responses to questions 13, 14 and 18.

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 response, see responses to questions 13, 14 and 18.

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**

No response, see responses to questions 13, 14 and 18.

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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 response, see responses to questions 13, 14 and 18.

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, see responses to questions 13, 14 and 18.

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 response, see responses to questions 13, 14 and 18.

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 response, see responses to questions 13, 14 and 18.

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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?

No response, see responses to questions 13, 14 and 18.

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

No response, see responses to questions 13, 14 and 18.

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

No response, see responses to questions 13, 14 and 18.

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

No response, see responses to questions 13, 14 and 18.

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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. Land Requirement – We agree that Interconnectors should not be included within the energy land density table in section 4.3. An interconnector should demonstrate the ability to host the onshore converter station footprint within the land area proposed by the project.</p>
<p>b. Planning Requirement – An interconnector may not follow the DCO process and instead follow the Town and Country Planning process as was the case for the Greenlink Interconnector. We suggest that an Interconnector, which benefits from Compulsory Purchase Powers and will be an important infrastructure project, is required to submit a project programme to the satisfaction of the NESO rather than an application for DCO consent.</p>
<p>No response, see responses to questions 13, 14 and 18. for c).</p>
<p>No response, see responses to questions 13, 14 and 18. for 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>We do not agree that the alternative route should be only limited to projects that seek planning consent through the Development Consent Order route. To ensure that the code does not result in any unintended consequences, we suggest that NESO retains the ability to exercise discretion for projects where the project promoter can demonstrate that the project has a realistic and deliverable project programme to meet the contracted connection date.</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?

No response, see responses to questions 13, 14 and 18.

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

No response, see responses to questions 13, 14 and 18.

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

No response, see responses to questions 13, 14 and 18.

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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)?

<i>These concerns are further to our concerns set out in the attached response to the NESO proposal on financial instruments.</i>
