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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](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 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
<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

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No – I am happy for my response to be available publicly

**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, it will be necessary to align the connections process to Government’s Clean Power 2030 Action Plan (CP30). The work required to reorder the connections queue is considerable. It is in the interest of network operators and customers that this process is completed both accurately and once. Wider strategic alignment with other initiatives will improve the quality of the end result. We think it’s necessary to protect projects already undergoing construction, as well as giving comfort to renewable generators to proceed, as the disruption to these could hinder the delivery of CP30.

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, we agree that the queue should include ready projects that align with CP30, directly connected demand and designated projects.

We believe in making the best use of the network and aligning the CP30 pathway with reform. The CP30 pathway needs to be carefully fixed so that it best aligns with the existing queue as closely as possible to support minimal queue churn and facilitate existing ‘needed’ projects to continue at pace. The Distribution Network Owners (DNOs) should also be able to feed in information about where the capacity exists on their network – and therefore what the CP30 pathway should place in any regional location – before this pathway is finalised. Not adhering to these design approaches risks a slower and less efficient delivery of Net Zero and ultimately the ability to deliver it at all.

The queue should also contain DNO designated projects as well as NESO designated projects.

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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**

No, we do not believe all ready projects should be included, as this would likely breach the CP30 advice and optimal technology mix needed by consumers in the next 10 years.

Where possible, the design of the queue should be based upon all known energy plans, be this CP30, the Strategic Spatial Energy Plan (SSEP), or Connections Reform, to provide long-term certainty for networks and industry. The more visibility that networks have over the queue, the better able they will be to deliver efficient reinforcement.

Consumers should not pay for infrastructure that is inefficient and not required, but the pathways need to ensure that attrition is included to take account of projects exiting the queue and leaving a gap. Technical limits and other flexible connections can be used to assign back-up projects for the 2030 pathway to ensure attrition can be catered for.

More consideration should be given before finalisation, to ensure the CP30 pathway aligns to the SSEP and Regional Energy Strategic Plan (RESP) future plans.

We believe that there may be a case to distinguish different levels of protection for different technologies, as there are varying levels of difficulty in obtaining planning and risk of undersupply/oversupply to the CP30 pathway. More development on this policy and alignment with the DNO community is required.

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, we agree.

It is our view that if projects are given connection dates beyond 2035, it is likely that many will never progress to connection, leading to further complications within the connections queue. As Connections Reform progresses and the queue is further refined and designed, the option to move to a rolling 10-year long connections queue and programme of works becomes a viable option.

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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, and NESO have made great progress in that regard. However, there are details and process elements which have not yet been finalised or detailed – particularly in respect of distribution networks. It is important these are finalised very soon, to give confidence and clarity to industry.

Projects in the 2035 pathway will find it very difficult to backfill projects from 2030 by accelerating, due to primarily planning permission and that their focus has been on a later completion. It could be helpful to use technical limits connections to offer projects 2030 dates, to ensure supply and adequate cover for attrition, particularly in areas where there is a risk of undersupply.

We agree there should be separate transmission and distribution queues. However, there may also be a case where a transmission project exits the queue and another transmission project cannot replace it, so it would be pragmatic to perhaps find suitable distribution projects that could make the replacement, thereby avoiding the risk of not meeting CP30.

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, however further detail in relation to Connections Network Design Methodology (CNDM), and how it will work at a distribution level, is vital in order to deliver against the two variables. Further clarity is needed in relation to how the methodologies can work for near-term projects, and what the impacts of these methodologies will be on those projects that currently do not have works and a near-time connection date. Connections reform should not create uncertainty for these near-term projects, which can potentially cause these projects to stall. This would contradict the purpose of connections reform, which is to ensure that ready projects can connect.

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Once the legal and licence framework for the DNOs has been agreed, it is important that the more detailed process of how the process and interactions work is carefully considered and documented.

Currently, there is no timeline included in the CNDM showing the handoffs between DNOs and Transmission Owners (TOs)/NESO, to enable the queue ordering and studying of the projects to integrate into the network.

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**

DNOs will need to know how the issue of oversupply might be treated with regard to embedded customers that have met Gate 2 but are sent to NESO as part of batched submission. Clarity needs to be provided around the process to ensure that embedded customers are not unfairly disadvantaged, particularly when determining which projects will be suitable for acceleration.

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**

As stated in our answer to question 5, projects in the 2035 pathway will find it very difficult to backfill projects from 2030 by accelerating, due to primarily planning permission and that their focus has been on a later completion. It could be helpful to use technical limits connections to offer projects 2030 dates instead of 2035 dates, to ensure adequate supply and to cover attrition, in areas where there is a risk of under-supply.

### 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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Yes, provided that each of the Gate 2 readiness criteria evidence points are consistent across transmission and distribution, and they are applied in the same way. Further detail is provided in our response to questions 13 and 14.

It is not clear from the methodologies what would happen if a DNO considered that a number of projects met the Gate 2 Criteria, while NESO disagreed with that assessment. It is important to provide clarity on how such disagreements would be resolved.

We have concerns about the wording at the bottom of section 2.3 (slide 9) of the Gate 2 Criteria. It is stated therein that projects close to energisation will also have to follow this process. There needs to be a clear cut-off date for existing projects that reflects the progress they have made. Removing a connection offer from a project that a customer or network operator is building out is disruptive and could jeopardise CP30. This would include connections due to complete in 2027, given the lead times for some plant and apparatus. See our response on projects that will be protected from CP30 filtering (grandfathering), under question 18.

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

Yes, however the supporting guidance that sits alongside this methodology will need to be clear regarding what it means for each of the advancement scenarios. There are a number of different scenarios in which advancement can be requested, and a number of different outcomes which have an impact on the existing connection agreement. We would also like further guidance on how an advancement date could be agreed between the TO/NESO/DNO, before finalising the offers to the customer.

Section 5.25.7 of the CNDM needs to provide additional clarity on what would happen to a Distribution project in the scenario described therein (i.e. where an offer lapses). If users' DNO agreement remained in place, would this mean that the project would have the opportunity to go back through Gate 2 later?

We also ask how advancement will affect queue position and the queue position of other projects. What impact will this have on the study work for transmission? Clear guidance needs to be given to customers on the consequence of requesting advancement and what happens when the advanced date is not agreed.

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

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Yes, we support the approach to reserving capacity for project technology types that are required to meet CP30. It is important for NESO to clarify how this approach will work for distribution given gate 1 does not exist, for instance where there is an under-supply of wind that cannot meet 2030 or 2035 targets.

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

As noted in our response to question 5, there may be a case where a transmission project exits the queue and another transmission project cannot replace it. In such a case, it would be pragmatic to perhaps find suitable distribution projects that could make the replacement, thereby avoiding the risk of not meeting CP30.

Updates to the reallocation policy at distribution, ahead of reform implementation, will need to be done in collaboration with DNOs.

Finally, we have a number of questions in relation to the proposed methodology:

- Section 7.15.3: this section implies that advancement is an enduring process. We would appreciate a clarification if that is indeed the case, as our understanding was that this process would only apply in the context of CMP435.
- Section 7.18.4: what happens if a 2035 pathway project gets re-allocated to 2030 but then cannot deliver against the accelerated timetable? Will the relevant projects be given the option as to whether they want to accelerate or not?

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## 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)

*Answer for a):*

We largely agree with Gate 2 Readiness Criteria – Land (Chapter 4). However, the methodology needs to be clearer in relation to the ongoing compliance for distribution-connected customers. At distribution level, any changes to the red line boundary are currently addressed through the ENA’s material changes guide. We ask whether this will continue or whether distribution customers will be expected to adhere to the ongoing red line boundary changes as per the methodology.

Also, as an overarching comment, we note that it isn’t clear in the document if the DNOs will be expected to confirm to NESO that the customer has met the ongoing compliance requirements. We ask that this is clarified soon, so that DNOs have the necessary lead time to put in place the necessary processes.

We also offer the following observations in relation to the consultation document:

- Section 4.1 (slide 13): We have concerns around clarity. The red line boundary plan given under the letter or authority does not need to match the red line boundary as part of Gate 2. We ask NESO to explain the rationale for this treatment, which seems counter-intuitive. We believe that the current proposal creates the risk that the red line boundary plan as part of Gate 2 might differ from the original application request. This goes against the ENA Allowable changes guidance.
- Section 4.2 (slide 14): Are NESO expecting DNOs to confirm that embedded customers have met minimum acreage requirements? NESO should also consider the impacts on generation connected to large existing demand supplies where land usage is mixed.
- Section 4.4 (slide 16): It is not clear if projects must meet the minimum density criteria on an ongoing basis, with NESO/DNOs conducting future checks, or whether this will be checked once at the time of application. We would appreciate a clarification.
- Section 4.5 (slide 17): It is stated that embedded customers will be managed by the DNOs, but the document does not mention the specific process which they will be

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expected to follow. It would be useful if NESO could outline clearly what is expected of DNOs in this regard.

- Section 4.7 (slide 19): While we appreciate that care is required around commercially-sensitive information, it must be possible for the DNO, TOs, or NESO to verify that the evidence submitted in a redacted land agreement is valid, relates to the relevant property, and has been agreed by the landowner. A balance must, therefore, be struck around redacting commercially-sensitive information and ensuring that the necessary land status information is accessible to and verifiable by DNOs, TOs, and NESO.
- Section 4.8 (slide 20): In relation to the three-year option agreement, this section is not clear when it says that a project does not need to have three years remaining on their option agreement at point of application. It is not clear how a project with less than three years remaining would pass the Gate 2 criteria.
- Section 4.9 (slide 21): The last bullet point suggests that the option agreement should be provided for projects that have progressed far along the connection pathway. We ask whether this is necessary, since, once under construction, many projects will have land rights that supersede the option agreement.
- Section 4.10 (slide 22): NESO needs to provide clear guidance on which evidence will be deemed acceptable, to allow all network operators to be consistent.

*Answer for b).*

Yes, we agree with Gate 2 Readiness Criteria – Planning (Chapter 5), provided that there is consistency across transmission and distribution in relation to how these are assessed.

*Answer for c).*

Yes, we agree with Gate 2 Criteria Evidence assessment (Chapter 8).

We also offer the following observations in relation to the consultation document:

- Section 8.3 (slide 38): It is stated that the DNO will need to confirm if it can accommodate a customer request for acceleration before NESO will undertake any assessment. This could lead to the DNO carrying out unnecessary work at an early stage since the wording suggests the acceleration should be agreed. DNOs cannot agree to accelerate until NESO confirm they cannot accommodate it as well. The process for this will need to be well defined and clear.

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- Section 8.4 (slide 39). NESO have used the term “Original Red Line Boundaries” when discussing duplication checks. This is unclear and contradicts section 4.1 which states the red line boundary plan submitted does not need to match the original. Furthermore, it is not entirely clear from this section what evidence NESO would require from an embedded customer. Specifically, would NESO require all the relevant evidence or just the declaration form and the red line boundary?
- Section 8.6 (slide 41): this section needs to take into account the fact that DNOs have up to 15 working days, following the closure of the window, to make these checks and get the information over to NESO.
- Section 8.8 (slide 43): this section states that: *“All Users who don’t meet the Gate 2 Readiness Criteria initial checks by the end of the Gated Application Window can dispute that decision\* but won’t be included in the Gated Design Process”*. We have concerns about this statement. Has NESO considered the potential legal implications of not allowing a customer who successfully disputes a decision by NESO to enter the Gated Design Process?
- Section 8.13 (slide 49): this section should provide guidance on how a disagreement between a DNO and NESO would be resolved; for instance, where the DNO believed that the criteria have been met, whereas NESO believed that the criteria have not been met. It would be useful to consider such a scenario at this stage.

Answer for d).

Yes, we agree with the Self-Declaration Templates (Chapter 9). We stress that it is critical that the same form is used across the industry, and that the same checks are performed at both a Transmission and Distribution level. We also ask NESO to consider whether the letter should provide the option for the developer to select the earliest date to which they would like to advance, which would be a date that they can achieve within their project timescales.

In relation to section 8.15 (Detailed Checks), we ask that the process is clarified where a DNO identifies a project at the detailed checking stage that does not pass. How will this information be passed to NESO, and what happens to that capacity within the batched assessment window?

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?

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Yes. It should be noted that some Development Consent Order (DCO) projects connect to the DNO level, whereas the way the methodology is currently written implies that such projects are not present at the DNO level.

### **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 believe that there are some important changes to be made in relation to the Project Designation Methodology.

DNOs should be able to set a Project Designation (PD) status in line with their trusted role to administer CNDM. The PD Methodology states that the ability to propose a designation to NESO can be done by a DNO. The DNOs need to be able to designate projects, along with their stated and trusted role to apply the Gate 2 criteria, CP30 criteria, and reorder the queue. The DNO is the body that has the information about the benefits a project would have on their network, and ultimately the consumer, and therefore it is only appropriate for this to be defined by the DNO.

Also, we believe that socio-economic benefit should also be considered as a category, with an associated and clear criterion for designation.

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

We refer to our responses to questions 15 and 17, which set out how the proposed criteria for assessing Designated Projects should be complemented to support the success of the connections reform programme.

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

All the designation category types should apply equally at distribution as they do at Transmission, as all the system benefits stated, could be realised at distribution too. It is important, however, that for both transmission and distribution, the reasons for designation are

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objective and externally reported. PD projects can detrimentally alter the queue position of other projects, therefore, the reasons for designation must be transparent and defensible.

Additional detail needs to be added to the CNDM section 5.7 to state how the queue number will be assigned to a project once it has been designated and how this interacts with the other projects in the queue.

### Additional Questions

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

Overall, NGED are supportive of the methodologies, however, considerations do need to be made across the documents of the distribution processes and how these methodologies will work for distribution customers. It is important to ensure that transmission and distribution customers are treated fairly. In this context, it is important that Gate 1 for transmission customers should not provide them an advantage in relation to distribution customers.

#### CP30 targets

Clarity around capacity allocation is a critical enabler for implementing connections reform.

The allocation of capacity by technology, across transmission and distribution, and transparency of the criteria used to derive this is critical. Achieving an appropriate capacity allocation is foundational in establishing and administering the frameworks that will subsequently implement reform. At present, there is no description of this methodology provided, whilst the queue outcome depends critically on this split.

The capacity allocations should best match the existing investments and applications that have been made in license regions. This will ensure reform can be implemented within the required timeframes and manage the costs to consumers. Although we acknowledge that there will be some winners and losers, finding the best balance of allocated capacity to optimise cost, speed, and Net Zero momentum, is key. We are keen to continue engaging with all relevant parties and providing data for NESO to work collaboratively with the network owners on this finalisation.

It is also important that NESO provide clarity on how these allocations interact with new capacity market contracts, technical limits contracts, new innovations and other flexibility contracts. At present, this detail has not been included in the current framework and could have an impact on firm capacity and the regional allocation of it.

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### Transparency

Transparency will be key for industry to understand what capacity will be connected. TOs and DNOs have an important role to play in providing the necessary information digitally, so that developers can build a business case and meet the need. To support this outcome, it is important that we have a unique identifier for all projects in the queue at transmission and distribution, with a consistent syntax, which supports efficient queue management.

It is important that industry receives clear signals now. An additional year of uncertainty would not support the aim of meeting CP30 targets. Along with publishing clear messages about how different generators will be treated in reform, relative to the CP30 allocations, the queue should be published as soon as possible to support transparency for the industry. Then, once the Gate 2 to Whole Queue outcomes are defined, this should also be published at pace.

Projects with Technical limits contracts need consideration. These projects have recently been offered contracts and are making investment decisions based on their contents. If the terms of these contracts are likely to change through connections reform, it is imperative that clear and timely guidance is given to industry.

### Projects which will not be adversely impacted by aligning the queue to the CP30 Plan (grandfathering)

NESO currently state that all projects in construction and due to deliver in by 2026 will not be adversely impacted by connections reform. Within this statement, 'in construction' has not been defined in enough detail to make it objective. We believe that the M7 milestone at the distribution network level, could provide the right level of investment certainty to protect a project from CP30 filtering.

We also know that the wind, solar and other renewable projects on our network are planning further out than solely those for delivery in 2026. There are projects due to deliver in 2029 seeking investment this year and are unable due to the uncertainty and we have heard from developers that this is having a significant impact on the momentum of projects. We believe the risk of under delivery for renewables, due to the current market uncertainty, is greater than the risk of over delivery.

To get the best balance of investor confidence, but staying aligned to the intent of CP30 we believe there could be a case for separating the grandfathering protection into nuanced categories for different technologies, which could better support the key objectives of CP30 and reform. We are discussing an aligned position within the DNO community and will continue to collaborate with NESO on possible solutions.

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We believe that more projects should be considered for exemption from the CP30 alignment than just those in construction; namely, those listed below with associated reasons.

Project type	Completion date	Reason to exempt from CP30 filter
With CfD contract	N/A	Already recognised and allocated a route to funding
Behind the meter (embedded generation where there is already demand)	Any date	These are local communities decarbonising and should not be subject to filtering from the queue
Generation added to existing generation connection – where the overall export capacity is not increasing	Any date	Not changing the export position and should not be held up.

### CP30 Capacity Allocations

The CP30 capacity allocations in the DNO regions are to be defined at a license level. However, it may be necessary for the DNO queues to be defined at GSP level per technology. This should be ordered and published by the DNOs. If the queues are defined at a regional level and projects must move forward in queue order, project delays at one GSP could delay projects at another GSP. Also, without GSP queues defined and published, it could open the DNOs up for challenge to subjective rulesets. Publishing of GSP queue orders per technology means greater transparency and objectivity in the allocation process.

The policy for when changes are allowed needs to be reviewed to ensure compatibility with CP30. Some customers may seek to change to fit CP30 ahead of CMP435. For others, it may be pragmatic to change technology to support CP30. Ultimately, we want to ensure momentum for the renewable projects with minimal churn in the connections queue, while enabling CP30 to take place.

### The crucial date which will determine the reordered queue position.

Currently NESO propose to use the NESO countersignature date as the 'original queue position date'. We understand that NESO believes this is the date that is most defensible within the current process and will align with the most recent studies. This date for distribution customers however will always be several months behind transmission customers at best and at worst, years. This will put distribution customers at a disadvantage when the whole queue is brought together for studying and therefore asset build prioritisation.

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Any perceptions of unfairness within the existing process would be exacerbated by the proposed reforms if the dates of the application to NESO or counter signature date were to be used to determine the queue position. For distribution projects, the application to DNO or IDNO needs to be the relevant date to determine the queue position. This would ensure that any delays originating outside of the customer's control would not impact the project outcomes. We do not believe that the use of this new date for distribution customers would significantly impact transmission connection dates overall once the non-viable projects have been removed from the queue. The DNO community is discussing this policy and needs to reach alignment on a consistent approach.

We have many customers caught in the 2-step offer process at the transmission-distribution boundary, that need a resolution ahead of reform go-live. It would be wholly unfair for their projects not to be considered in the queue assessments when the applications happened long before the start of reform implementation. It is important that a clear deadline for these queries to be resolved can be set and met by all relevant parties.

Issues that need to be addressed for the reformed connections regime to work efficiently across all levels of the system.

Below, we have detailed comments or concerns around different sections of the CNDM. These issues need to be addressed for the Code modifications and the methodologies to work across transmission and distribution.

As an overarching comment, the documents often read like they have been drafted solely with the transmission system in mind. There are several areas where NESO and/or TO are mentioned, without a similar reference to DNOs. We think that this is an omission which should be corrected in the text. We ask NESO to revise the documents to ensure that DNOs are also considered. Similarly, our reading of the CNDM is that any area where NESO's role is referenced, DSOs should be thought of to undertake a similar activity. We also ask that the documents are updated so that there is certainty around the activities that DNOs are expected to undertake.

Consideration needs to be given to IDNOs and whether the same queue position criteria is applicable to their projects and if not, how will their applications be treated in a fair way without disadvantaging other queued projects.

We offer the following comments in relation to specific sections of the CNDM:

- Section 5.5.3. states that 'maintaining relative queue positions' should help to minimise transmission plan changes and maintain momentum to deliver CP30. However, at present, the DNO allocations do not match the capacity in the queue and without changes to the allocations, queue churn and associated reinforcement would be high.

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- Section 5.14: as well as publishing the outcomes of the Gate 2 process, it should be made clear what capacity/technology/location is available for re-allocation, so that it can be fairly accessed. The requirement to have clear digital capacity maps and queue lists should ensure that all industry parties have clarity about their expected roles.
- Section 5.18 is an example of our overarching comment that the documents need to be updated to reflect DNO activity.
- Section 5.19.2b): the word ‘several’ needs to be defined. How many project Progressions would fall under this category? It should be noted that DNOs may also want to direct the TOs/NESO to prioritise a GSP for study, if there are particular constraints or larger volumes of generation connecting.
- Section 5.20.1: The DNO queues will be re-combined with the transmission queue for restudy. As noted already, it is vital that the queue position ensures a level playing field. This exercise should not prioritise transmission projects over distribution.

### Regulatory framework

The DNO license, codes, and the legislation should be updated to empower the DNOs to conduct their role in CP30, as detailed in the CNDM.

Swift progress must be made to update the regulatory and statutory framework that will support the DNOs to allocate, optimise, and maximise the capacity on their network with the appropriate level of protection. This is the intent behind the CNDM, but without the appropriate framework changes, the DNOs are unable to conduct that important role in CP30.

The ENA and DNOs are currently examining the specific framework changes needed, and once this position is finalised, – the CNDM will need further updating to ensure consistency throughout. We must ensure we do not move forward ahead of the regulatory and statutory changes which would be needed to achieve this autonomy. If the framework changes are not made in time for reform, then the process for implementation, detailed in the CNDM, will need to be reviewed.

### Implementation Timetable

The timetable for reordering the queue is extremely challenging and it will not be possible to achieve using current processes, so we must find new ways to achieve the target date.

The reordering of the queue is timetabled to begin in May 2025 and the current timescale proposes having all offers issued by November/December. The study work needed to best optimise the new queue will require a full reassessment of all transmission and distribution constraints, and reallocation of securities, liabilities and costs based on the new order. If we adopt current processes, the industry will need to achieve in 4 months what would normally take

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27 months (across transmission and distribution processes). We therefore need to find an alternative approach and align across industry at the reform implementation hubs.