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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>Organisation</b>	Root Power
<b>Email Address</b>	Sarah.lightfoot@ylemenergy.co.uk
<b>Phone Number</b>	07787255341
<b>Which category best describes your organisation?</b>	<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 checked="" 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 <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. However:*

*There is a lack of clarity on:*

- *The methodology used by NESO to derive regional capacity 'pots'*
- *The methodology used to derive the split of capacity between transmission and distribution*
- *Where NESO considers the transmission/distribution boundary to be*

*There is also potential for mismatch between regional allocation and capacity available at distribution.*

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. However, there is a lack of clarity on:*

- *How technology-specific queues are integrated following re-ordering*
- *How queue re-ordering affects distribution customers – especially Technical Limit offers*
- *How projects which have not yet received Project Progression outcomes will be assessed as part of the queue reordering. Also, if the date of accepting the PP outcome is used as the date for reordering, I don't believe this to be appropriate, as PP submissions are dictated by DNOs and not by individual Developers.*

*• Step 7 of the queue re-ordering process is also an inappropriate step – as projects with planning submitted will be ahead of projects with planning granted (i.e. not in order of 'readiness').*

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?

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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.*

### 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.*

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**

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No.

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**

*Yes, we agree with the approach to attrition.*

### 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. However, further resources must be provided to NESO to ensure that suitably qualified professionals are assessing whether projects have met the readiness criteria.*

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

*We do not believe it to be productive to include a possible change in POC as a result of an advancement request. In many cases projects are located based on their POC and a change in this could result in the project becoming uneconomical.*

*We also do not agree that if an advancement request is made and if the offer is not economically viable, there is no option to request a reoffer to the original connection date as this puts the projects at mercy of the TO and could result in developers being forced to either accept accelerated connections which are economically unviable or terminate their projects.*

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

*No, we do not agree with the concept of reserving for undersupply against the CP30 Plan pathway(s) to 2030 as this would mean that technologies which have been identified as required in specific regions would be favoured and liable for less reinforcement work costs than projects which have applied to connect much sooner.*

*Considering NESO is also planning to move connection points for projects which apply to be accelerated under the CP30 plan, allowing non-existent projects to reserve connection points would mean that accepted to connect projects are disproportionately disadvantaged by this.*

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

*Yes, however we believe that the definition of 'like for like' projects which will be replacing the project which exited the queue needs to be defined more clearly. And the decision on which project is accelerated to fill the gap should be based heavily on RTB status.*

## Gate 2 Criteria Methodology

You can find the relevant information in the [Gate 2 Criteria Methodology- Detailed Document](#)

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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)

*Please insert your answer here for a). Yes. However need to ensure suitably qualified experts are resourced to review this information to avoid developers submitting insufficiently detailed option agreements.*

*Please insert your answer here for b). Yes.*

*Please insert your answer here for c). We do not agree that DNOs are responsible for managing readiness submission for DNO connected projects as we do not believe them to be adequately resourced to manage this process effectively. I believe this will cause additional delays and a disadvantage to distribution connected customers*

*Please insert your answer here for d). Yes.*

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?

*Please insert your answer here Yes.*

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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?
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<i>Yes.</i>
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16. Do you agree with the proposed criteria for assessing Designated Projects?
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<i>Yes.</i>
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17. Do you agree with the indicative process NESO will follow for designating projects?
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<i>Yes.</i>
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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)?

*Only projects with project progression outcomes will be considered for Gate 2. I strongly believe that this should not be the case given that Project Progression submissions are managed entirely by the DNO and we are seeing delays of almost 2 years in some cases for DNO Project Progression submissions (for example, in Northern Powergrid area). Using this as a criteria for gate 2 puts distribution projects at an unfair disadvantage due to the delays caused by DNOs. This would result in projects which have planning consent and land secured not being considered for acceleration to CP2030 – due to the fact that DNOs caused a delay in submitting these projects for Project Progression.*