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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 type="checkbox"/> Distribution Network Operator <input checked="" 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 checked="" 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, aligning with the Clean Power 2030 Action Plan is required for meeting decarbonization goals. However, this alignment must also address underlying issues such as the lack of transparency in data and methodologies used in determining regional capacity allocations. Without greater clarity, industry will have further challenges in making strategic decisions in support of the CP30 goals.*

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, prioritizing projects that align with the Clean Power 2030 Action Plan is sensible. However, the transparency issues surrounding the data and methodologies for capacity allocation at each region and the impact at distribution level remain a significant barrier to making informed development decisions. Little has been presented in addressing the contradiction between the DNO and the CP30 capacity targets, where potential solutions such as Technical Limit connection offers seem like a closely guarded secret. There is no clarity in the messaging at present to allow confidence in pushing forward development of distribution projects which will have full consents, can secure a Gate 2 offer and contribute to CP30 capacity targets but which currently have a connection date of 2037.*

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**

*Yes, all ready projects should be included. We do not agree with the additional financial instruments such as the proposed £20k/MW element which would not have the intended impact of reducing unviable development. The securities against cancellation charges are already a sufficient financial instrument in deterring unviable developments from progressing.*

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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**

*Prioritizing 2030 and 2035 targets is logical, but only partial information has been provided. The lack of capacity allocation data for the 2035 horizon and a clear picture of how this aligns with readiness and existing connection arrangements significantly hinders confidence in this approach.*

### 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**

*Partially. While the prioritization framework makes sense in terms of "First Ready, First Connected", the lack of transparency in how CP30 capacity pots are allocated regionally, and the absence of wholistic datasets, undermine efficiency and alignment with the Clean Power 2030 Plan. At a distribution level, further collaboration with DNO is needed to ensure these options are effective providing transparency on accessing connection solutions.*

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, the methodologies fall short due to the lack of transparency and clarity in how capacity allocation decisions are made. Without this transparency, the reform risks misalignment with strategic goals and leaves developers unable to make informed decisions.*

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**

*Yes, the lack of consideration of existing distribution level connection solutions and how they align with the new queue is a critical gap. More work is needed to ensure that these initiatives are integrated into the reform and that ready projects can connect in a timely manner despite transmission work impacts.*

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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**

*The approach to attrition management is generally reasonable. However, without full capacity allocation data for the 2035 horizon, it is difficult to assess whether the approach will maximize consumer benefits effectively.*

### 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?

*Partially. While readiness criteria are critical, projects at the distribution level, despite meeting readiness criteria, may still face long connection delays (e.g., 2037). Addressing these systemic delays through clearly defined technical limits initiative pathways, clear reallocation rules for general capacity and connection point capacity, and better alignment with transmission work is essential.*

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

*Advancement requests at distribution may be unfairly assessed against other projects due to known delays in the DNOs notification of these projects to NESO via Project Progression/SoW processes. In reverting back to "first come, first served" type priority in the final stage of the proposed queue reshuffling (post readiness criteria), the order should be taken on distribution level connection acceptance and not Project Progression/SoW acceptance as delays with DNO submission, out with the developers hands, may allow other projects with much later initial acceptances to get priority.*

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

*No, this could further hold up development for "ready" projects with speculative projects retaining capacity. An example would be a bay at a substation being retained by a Gate 1 project which could be better utilised by a project which is ready as a more viable connection solution. Transparency in how these decisions are made and ensuring equitable access for all ready projects impacted by transmission work is necessary to avoid speculative development benefiting disproportionately.*

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

*Yes, reallocating capacity due to attrition is critical in meeting CP30 targets.*

### 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?

- Gate 2 Readiness Criteria – Land (Chapter 4)
- Gate 2 Readiness Criteria – Planning (Chapter 5)
- Gate 2 Criteria Evidence assessment (Chapter 8)
- Self-Declaration Templates (Chapter 9)

*Please insert your answer here for a). Yes - Heads of Terms agreement accompanied by a letter of Authority (within 6 month of acceptance).*

*Please insert your answer here for b). Submission as an initial milestone with appropriate timelines allocated for this process.*

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

*Please insert your answer here for d). Yes, provided these are not overly burdensome for developers.*

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?

*Partially. While DCO projects are generally well-prepared, excluding other projects that demonstrate readiness through alternative processes could unfairly disadvantage certain developers.*

### 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?

*"Projects Addressing Specific Needs" should be widened (or a new category added) to allow for projects which offer benefits to support the network, such as stability/flexibility services, with a set framework to be considered in meeting this criteria.*

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

*"Projects Addressing Specific Needs" should be widened (or a new category added) to allow for projects which offer benefits to support the network, such as stability/flexibility services, with a set framework to be considered in meeting this criteria.*

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

*Capacity should not be retained for an extended period of time for designated projects which are not "ready" beyond other projects which are.*

**Additional Questions**

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

*The proposed alignment of the connections process with the Clean Power 2030 Action Plan is a necessary step toward achieving decarbonization goals, but its success depends on addressing critical shortcomings in transparency, methodology, and systemic coordination. While prioritizing "ready" projects and focusing on 2030 and 2035 targets is logical, the lack of clarity in capacity allocation, readiness criteria, and regional impacts creates significant barriers for developers, particularly at the distribution level. To ensure efficiency and fairness, reforms must incorporate transparent data-sharing practices, equitable prioritization mechanisms, and better integration of distribution and transmission strategies.*