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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	Luke Scott
Organisation	Northern Powergrid
Email Address	<u>Luke.scott@northernpowergrid.com</u>
Phone Number	07549445961
Which category best describes your organisation?	<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
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
Yes

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

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

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

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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

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
<p><i>For Distribution Network Operators (DNOs), we require more detailed information on the Bilateral Embedded Generation Agreement (BEGA) process, especially as we transition to two Gate 2 application windows. Specifically, how will the modification application process work? It is crucial to ensure that DNOs are not given unrealistic modification notices that coincide with or are too close to the existing application window, making it unfeasible to meet the deadlines. Additionally, the alignment of DNO customers with Transmission customers in terms of the time allocated to sign a Bilateral Connection Agreement (BCA) needs to be addressed. Transmission customers are given 90 days, and DNOs also have 90 days, but within this period, DNOs must provide their customers with a 30-day notice to agree. This discrepancy needs to be resolved to ensure fairness and efficiency.</i></p> <p><i>Regarding data exchange between NESO and DNOs, the current manual process is cumbersome and inefficient. We propose automating this process and moving to a single source of truth to streamline operations. Furthermore, it is essential to have a consolidated view of preceding works against the EX-numbers for each Grid Supply Point (GSP). This information should be accessible in one place, allowing for a clear overview without the need to consult multiple documents. This consolidation will aid in the accurate reapportionment of costs.</i></p>

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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**

Yes

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

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

Yes

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

Yes however transparency is needed, ie what you are reserving and why

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

Yes

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)

Please insert your answer here for a). Yes

Please insert your answer here for b). Yes, however we think planning is a low bar and won't have the desired effect, therefore schemes with a connection date of 2025 & 2026 will also need to meet M6, M7 and M8 of the ENA queue management milestones, if they do not meet the milestones, they will form part of the CP2030 strategic process.

Please insert your answer here for c). Yes

Please insert your answer here for d). Yes

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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?

Yes

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?

Yes

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

Yes

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

Yes

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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>Please insert your answer here</i>
