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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.

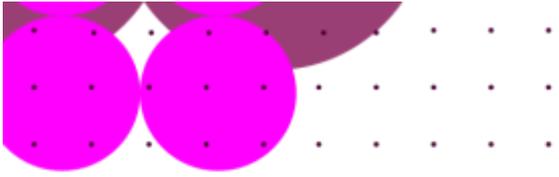
Please provide your feedback using this Proforma and sending an electronic copy to box.connectionsreform@nationalenergyso.com by 5pm on the closing date of 2nd December 2024.

We encourage early submission ahead of the deadline where possible to aid the processing of responses.

Respondent Details	
Name	Dennis Gowland
Organisation	Research Relay Ltd
Email Address	dennis@researchrelay.com
Phone Number	07739392965
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 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 checked="" 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

Section 1 - Policy





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You can find the relevant information in the [Great Britain's Connections Reform: Overview Document](#)

Comment [RE(1)]: Link needed

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
<i>The CP30 plan seems too restrictive and needs to be extended to 2035</i>

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
<i>There needs to be clarity, transparency which would be difficult to align if criteria based on 'need' were to be introduced. Difficulties for investment decisions which are now being made for projects connecting up to 2035.</i>

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
<i>Are they of the right 'mix'?</i>

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
<i>Yes - it seems more balanced and would allow less uncertainty to investors</i>

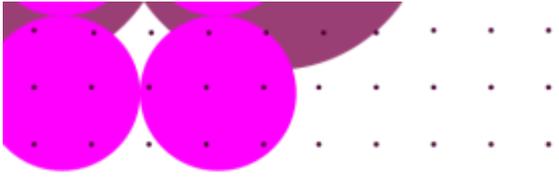
Implementation Questions

You can find the relevant information in the [Great Britain's Connections Reform: Overview Document](#)

Comment [RE(2)]: Link needed

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
<i>Seems overly complicated to access all the information required from numerous</i>





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documents. Is there enough flexibility in the favoured options - or are we stuck on fixed 'rails' with little room to manoeuvre as circumstances change. Yes to 2035 plan - as far as it can be understood. Effective TEC 'cap' proposed if projects exceed a given 'pathway' (2035) - when will this 'cap' be known to developers?

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**
Very complicated. Care needs to be taken with respect to Embedded Generation projects where delays could be incurred due to failure of an effective/efficient interface between DNOs and NESO. Potential loss of control for developers in the process.

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**
How sensitive is the policy to increased and significant local demand centres such as Hydrogen/Methanol etc.? How could projects which were seen as outside the CP30, as currently envisaged, be taken back into the queue and offered new and closer connection dates.

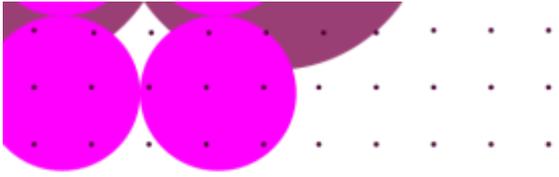
8. Do you agree with our approach to managing project attrition between 2025-2030, and 2031-2035, whilst ensuring that the SSEP can deliver maximum benefits to GB consumers?
You can find the relevant information at **Section 7 - Further variables and options to align connections reform with strategic energy planning**
There has to be some basis to forming estimates - so maybe this is as good as any other - until such time as deviation becomes significant.

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





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future Gate 2 Tranches?
Strategic Alignment needs to have clarity - seems a bit vague as it stands and adds uncertainty.

10. Do you agree with the approach to managing advancement requests?
Transparency is key here.

11. Do you agree with the approach to reserving Connection Points and Capacity at Gate 1?
Transparency and clear process is required.

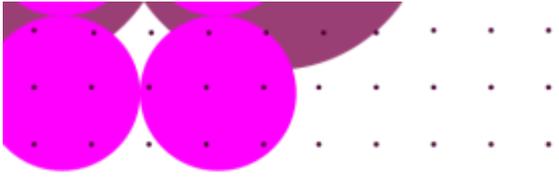
12. Do you agree with the approaches to reallocating capacity when 2030 pathway projects and 2035 pathway projects exit the queue?
Transparency and flexibility as the balance of demand/generation changes geographically and weight to suitable technologies which may differ in different places.

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





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<i>Please insert your answer here for b). Yes</i>
<i>Please insert your answer here for c). Unsure</i>
<i>Please insert your answer here for d).Can't find in supporting documents</i>

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?
<i>Please insert your answer here</i>

Project Designation Methodology

You can find the relevant information in the **Project Designation Methodology - Detailed Document**

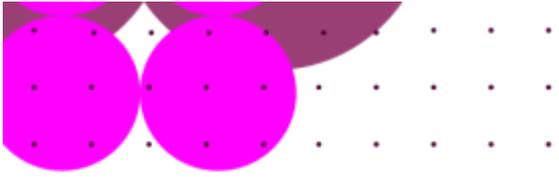
Comment [D3]: Need a link here.

15. Do you agree that the categories of projects that we have identified are the appropriate ones to potentially be designated?
<i>Up to a point. Will these change over time?</i>

16. Do you agree with the proposed criteria for assessing Designated Projects?
<i>Will these be fully objective (based on data?)</i>

17. Do you agree with the indicative process NESO will follow for designating projects?
<i>Needs to be clear with a transparent process.</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)?
<i>Please insert your answer here</i>

