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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.

Respondent Details	
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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 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
<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.

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, especially the emphasis placed on the inclusion of Solar. This should also go further to include a sector level prioritisation, e.g. hard to abate sectors, such as aviation, should have scheme applications prioritised over others in order to be able to achieve decarbonisation policy objectives.*

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, but a form of prioritisation should be in place for those sectors that are hard to abate, such as aviation, which should have schemes prioritised over others in order to be able to achieve decarbonisation policy objectives. To achieve this, we suggest the SSEP is also aligned to Government mandates and legislation such as the Jet Zero Strategy.*

*Separate consideration for schemes with a 100% behind the meter solution should also be regarded differently to those adding generative capacity to the Grid – these schemes generally have minimal impact on the fault level analysis and could possibly be considered in a different context when assessing the queue.*

*Furthermore, an easier and more transparent method for appealing decisions on connection time allocations would be helpful.*

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4. 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**

*No, it should start sooner. Businesses and organisations who have already had projects in the queue for a number of months and years and are awaiting approval, or are readying projects for submission, need certainty as swiftly as possible if they are to attract the necessary investment and achieve decarbonisation targets in line with the Government's mandate.*

*This is particularly essential in light of the Government's stated ambitions regarding economic growth and inward investment, following statements made at the Autumn Budget and International Investment Summit. Delays in connecting projects to the grid, and not providing certainty to organisations and businesses who plan to submit applications ahead of 2035, will only stall these ambitions, deterring prospective investors and inhibiting the economic growth the UK so desperately needs.*

## 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**

*Alignment with other sector policy, such as aviation's emerging Jet Zero Strategy needs to be considered. For example, we urge most strongly prioritising aviation-sponsored Distribution connected generation projects to enable the sector to reach Jet Zero.*

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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. However, we recommend that in setting the ‘Objectives and Data’ to inform Gate 2 decisions, consideration should be given to prioritising Distribution connected generation projects that support hard to abate sectors such as aviation. This can also have the potential to help prioritise projects in oversupply scenarios.*

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

*Advancement requests are an important addition to the process, however, methods to prioritise which schemes advance over others is vital. As well as strategic alignment with CP30 and the SSEP an additional element should be incorporated for Distribution connected generation projects that support hard to abate sectors like aviation to decarbonise.*

*In addition, users that make an advancement request should not see a change to their existing Point of Connection and they should continue to benefit from any other advancements regardless of the request, such as increases in capacity at a substation.*

*Furthermore, projects that have funding, land and planning permission should automatically be given an accelerated position in the queue otherwise schemes face the risk of falling away.*

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

*No. Given the scale of the constraints that exists on the network, reserving connection points will only block the roll out of CP30 aligned ‘shovel ready’ schemes sooner. By bringing online other schemes earlier, e.g. solar, will mean less solar will be required for subsequent periods, which will allow other schemes, e.g. wind, to catch up. Such an approach will bring about an overall acceleration in decarbonising the grid.*

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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, when selecting such schemes NESO, working with the DNO should identify projects that can support wider policy objectives, such as helping hard to abate sectors like aviation to decarbonise quicker.*

## 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). n/a*

*Please insert your answer here for b). n/a*

*Please insert your answer here for c). n/a*

*Please insert your answer here for d). n/a*

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?

*n/a*

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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?

*Yes, plus a category that aligns, enables and helps prioritise the delivery of other sector policy. For example, aviation's emerging Jet Zero Strategy.*

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

*n/a*

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

*n/a*

## Additional Questions

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

*Please insert your answer here*