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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	
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Phone Number	
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 checked="" 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**

SP Energy Networks (SPEN) is strongly supportive of the NESO’s intention to align the connections process and associated reformed connections queue, to the Government’s Clean Power (CP2030) Action Plan. With the NESO forecasting the need for 200–225GW of generation by 2030, it is right that the reformed connections process is focused on connecting this required capacity as speedily as possible, and in line with the CP2030 ambitions.

We welcome the scope of the NESO’s CP2030 forecasts covering a 10-year period, looking out to 2035, rather than 2030. This longer-term focus provides certainty to both developers and network operators as to the projects and network infrastructure required to deliver the 2030 and 2035 Clean Power ambitions.

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**

Like the NESO, design 2 is SPEN’s preferred option for reforming the current connections model. With the NESO previously estimating that only 30% of projects holding connection contracts are expected to connect, it is sensible that the reformed process focuses on those “readier” projects as we look to rework the current connections queue as part of the Gate 2 to Whole Queue exercise in 2025.

We are therefore supportive of the approach which focuses on the “readiness” of projects whilst also considering the technologies required across each network region to meet CP2030 ambitions. It is also essential that regional technology capacity pots are identified for both 2030 and 2035 timelines, as mentioned above, providing certainty to developers and network operators alike, on the scale of network infrastructure and connection generation capacity required up to 2035.

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We are however not supportive of CP2030 and design 2 not including demand connection forecasts within its scope. SPEN is seeing a rapid acceleration in the number of connection applications (both directly connected and embedded projects) being received for demand connections. With winter peak demand of 4GW across SPT's network, a significant increase in overall demand has significant impact for the operation of Scotland's network, not to mention the scale of transmission infrastructure required to support demand projects, in particular when there is not an abundance of renewable generation on the network. Instead, we believe that CP2030 should include regional demand forecasts out to 2030 and 2035, for all directly connected and embedded demand projects which would then align with the application of the reformed connections process. We must also be mindful of the impact of adding significant volumes of demand projects to the current connections queue which is likely to have an impact on the current CP2030 generations forecasts, whereby there may be a need to connect additional amounts of generation capacity to the network. This could have an impact on timely delivery of the Clean Power ambitions for 2030 and 2035.

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, as mentioned above, SPEN's strong preference is for the implementation of design 2, an approach which align technology type with location and also the generation capacities required in the CP2030 forecasts.

The scale of the current queue is creating significant uncertainty and inefficiency in the workload to the NESO, network operators and developers. There is no benefit in continuing to develop and support an extensive queue of connection projects which are not required. Such an approach encourages developers to continue to spend money progressing projects which are not required. The development of these projects also unnecessarily uses up scarce planning and supply chain resources where certainty and timely decision-making will be fundamental to those "ready" projects which have been identified as being required under the CP2030 plans.

Looking to the required generation and demand capacity required post 2035, this should be the role and responsibility of the Strategic Spatial Energy Plan (SSEP) which is currently still under development. It is right not to second guess the work or requirements of any future SSEP, therefore design 2 respects the boundaries of the scope of CP2030 and future SSEPs.

4. Do you agree that the reformed connections queue should initially focus on the 2035 time horizon?

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You can find the relevant information in **Section 4 – Key building blocks for aligning connections to strategic energy plans**

As noted above, SPEN is supportive of the reformed connections queue looking out to 2035, providing confidence to developers and network operators alike. We consider a 5 year view out to 2030 is too short a time. From a network operators’ perspective, a focus out to 2035 provides certainty in development and delivery for the network infrastructure required to support the reformed connections queue. It provides UK and Scottish Governments with clear indications of our short to medium term development and delivery plans which we very much hope will allow for speedy regulatory and planning consenting decisions from the required parties.

A focus out to 2035 also helps network operators’ engagement with the supply chain, against a particularly competitive international supply chain environment, showing a pipeline of network infrastructure projects out to 2035 and beyond.

Regarding embedded projects with current connection dates post 2035, they will need to apply for advancement in order to fall within the CP2030 alignment requirements for 2035, subject to them meeting the Gate 2 criteria. Clarity needs to be provided on how those subject to non-attributable works will be able to advance.

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**

SPEN agrees that the overall design 2 delivers the most efficient alignment with the Government’s CP2030 Plan.

Clarity needs to be provided on the treatment of Small/Medium Embedded Generators who do not meet Gate 2, as they will not receive a Gate 1 contract.

NESO have ensured that for projects already under construction and due to commission in 2026 or earlier will not be adversely impacted by aligning the queue to the CP30 plan. “Under

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construction” has not been defined in enough detail to make it objective so further work is required here. For Small/Medium Embedded Projects, SPEN believe that meeting the M7 milestone (Financial Investment Decision) would provide the required level of certainty for these projects to be excluded from the CP30 alignment.

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**

SPEN agrees that the methodologies largely deliver the preferred options against each of the variables, however, where there are specific elements that we have concerns, we have highlighted within the relevant questions.

As the system operator for the electricity transmission network, it is appropriate that the NESO has the powers to designate projects, and provide them with a prioritised queue position, where they bring additional benefits to the wider GB economy.

SPEN considers that all the priority areas set out within the Project Designation Methodology are reasonable and merit further NESO consideration as to whether they should achieve a prioritised queue position. Where there are issues with regards to Security of Supply, System Operation, and opportunities to materially reduce generation constraints, we would expect the NESO to be engaging and fully consulting with the relevant TOs, well in advance of taking any decisions on projects fully within this particular methodology. Effective implementation of this methodology and successful mitigation of network issues are best addressed by the relevant TOs and NESO identifying and engaging on network issues at the earliest possible opportunity, learning lessons from the previous Stability Pathfinder 2 exercise where TOs’ weren’t involved in agreeing the requirement for, or scope of the network solutions, which has unfortunately resulted in many challenging issues that have had to be addressed in the connection and delivery of the Stability Pathfinder 2 projects.

Furthermore, the inclusion of Competitively Appointed Transmission Owners risks the TOs ability to deliver actual customers connections where bays or capacity on the transmission network are reserved or dependent on another party to deliver that capacity, as emphasised by the Network Commissioner’s recommendations. As per our previous consultation responses, SPEN continues to hold the view that CATOs fall out of the scope of this methodology as they are not facilitating customer connections.

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?

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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**

SPEN is of the view that those limited number of strategic demand projects, which Government considers as “Strategic Demand”, should also fall within the scope of the Project Designation Methodology. If UK Ministers have proactively identified these Strategic Demand projects as having significant benefits to the UK economy, then it feels appropriate that this should be recognised within the connections process, with these Strategic Demand projects being considered for a potential prioritised connection. SPEN believes such an arrangement for “Strategic Demand” projects could be facilitated under the “materially reduce system and/or network constraints” category within the proposed Project Designation Methodology.

The approach for embedded projects with post 2035 connection dates due to non-attributable works needs to be clarified, as such projects may be required to meet CP30 targets.

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**

We are in agreement with the NESO’s proposals to manage attrition between 2025–2030 and from 2031–2035, in order to ensure alignment with the future SSEP.

Whilst it appears sensible that where a project falls out of the 2025–2030 queue, a project from the 2031–2035 queue should be sought to replace the removed project, clear guidance will be required as to how this will be executed in practice, to ensure an effective and transparent process is put in place. We would expect this to be covered in the CNDM documentation.

Clarity is also required on how embedded projects would be managed.

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?

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A)

Yes, with a current contracted background of over 750GW, SPEN agrees with the approach to applying the Gate 2 Readiness Criteria and Gate 2 Strategic Alignment Criteria to the existing queue.

Timely provision of the embedded queues from DNOs to the NESO, and subsequently the TOs, will be crucial to ensure a timely review of the current contracted queue. We would welcome certainty from the NESO on the expected timelines for the DNOs to provide their embedded queues to the NESO (and TOs).

As indicated, we are particularly supportive of the proposals set out within this CNDM Consultation document as we work collectively to achieve the UK's Net Zero ambitions. It is noteworthy however that revision of the queue as proposed may, in some circumstances, lead to a requirement for additional transmission reinforcement works so as to ensure continued compliance with relevant technical standards.

With respect to Figure 8 in the CNDM Consultation document, the NESO may wish to consider in the example parties "already under construction and due to commission in 2026 or earlier", so as to be clear on their treatment and the implications.

Detailed below are responses to the questions raised within the methodology document:

- **Do you agree with the three categories of Planning Obtained, Planning Submitted, and Land Rights for sorting projects?**

SPEN considers two categories should be used for sorting the queue, Land Rights and Planning Obtained. We do not consider Planning Submitted as a significant enough milestone to sorting the queue order of projects, given submission of a planning application is in no way determinant that Planning consent will actually be secured.

- **Do you believe Phase 2 should remain in existing relative queue order, or should it also be reordered by planning status to determine alignment to the CP30 Plan?**

Given the 2031-2035 delivery timeline, we do not consider that Planning status should influence queue position, as for many of these projects, and the current connection date they hold, it is too early to secure Planning consent for fear of it expiring before construction commences. Instead, the use of existing relative queue position feels like a sensible approach for ordering Phase 2 projects.

With respect to Figure 8 in the CNDM Consultation document, the NESO may wish to provide further evidence to support its proposal that parties at the end of the 'Phase 1 queue', who do not meet the CP2030 alignment criteria, are moved to the front of the 'Phase 2 queue' when alignment with CP2030 requirements for 2035 is determined. The merits of this approach,

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relative to Phase 2 alignment with CP2030 requirements for, being determined solely based on relative queue position, should be detailed.

- **We have explored two alternatives, shown on pages 82 and 83? Would you support either of these alternatives over the proposed approach on page 29?**

SPEN would not support either of these proposals over the preferred CNDM in this consultation as we consider it provides the right balance to the use of queue position, projects where Planning has been secured as well as projects which the NESO deems important for system operation.

Alternative 1 – Current Queue Order

Existing queue position to the Gate 2 to Whole Queue Exercise is an important component when undertaking the Gate 2 to Whole Queue exercise, however, we do not consider it to be the only component which should be used. The Project Designation Methodology and projects where Planning consent has been secured should also be taken into account when re-working the queue. It is important that the revised queue is made up of projects which the NESO considers important for security of supply and projects clearly progressing, having secured Planning consent.

Alternative 2 – Planning Status

As per the above position, we do consider that existing queue position to the Gate 2 to Whole Queue Exercise is an important component when undertaking the Gate 2 to Whole Queue exercise. Whilst we are supportive of an approach which acknowledges projects that have secured Planning consent (however not Planning submitted), we do not consider that Planning status should be the only driver to the CNDM.

B) Do you agree with the approach to applying the Gate 2 Readiness Criteria and the Gate 2 Strategic Alignment Criteria to future Gate 2 Tranches?

Yes, although we would welcome further clarification regarding the interaction between Figure 17 in the CNDM Consultation document and the note at Section 5.17.6 in relation to reservations and undersupply to 2035.

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

For those parties who believe they can deliver their projects to an earlier date than the connection date they hold in their current connection offer, we agree with the approach proposed for considering advancement requests.

It should also be noted that any advancement of connection date may be subject to enabling transmission reinforcement works as well as the physical construction of transmission connection assets, for which the lead time can vary. For instance, an overhead line circuit which involves the Section 37 planning permission process can take several years. Other assets may be subject to supply chain availability. This should be noted in the relevant sections of the CNDM document (e.g. Sections 5.22 – 5.23, which are the main sections relating to Advancement Requests).

- **Do you agree with taking advancement requests into consideration when reordering the existing queue?**

SPEN is comfortable with the approach of taking advancement requests when re-ordering the current queue. However, in addition to developers doing their own due diligence, we believe that developers should also be required to provide sufficient evidence of their due diligence exercise to the NESO and/or relevant DNO to show their level of preparedness for being able to deliver their project to an advanced connection timeline. This is important, given that advancing a project is likely to have an impact on the level of works required for projects behind them in the queue.

We would welcome within the CNDM a worked example e.g. following Section 5.22.8, detailing the process to assess alignment with the 2035 pathways in the context of advancement requests.

Advancement is essential for projects with connection dates post 2035 who would meet both Gate 2 readiness and strategic alignment this is particularly relevant for embedded projects within our areas and extensive resources will be required by the DNOs for technical studies, reassessments and the co-ordination of advancement requests between NESO and the DNOs.

- **Do you agree with the limited circumstances under which NESO would permit Users to request reversion to their original connection date?**

In order to prevent some developers from ‘gaming’ the arrangements to see if they can secure a preferable connection date and works, we do agree that restrictions should be put in place to prevent developers, who have requested an accelerated date, being able to revert to their original connection date. We consider that this arrangement promotes fairness and a level playing field, across the Gate 2 to Whole Queue exercise.

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

Yes, SPEN agrees with the approach of reserving Connection Point and Capacity at Gate 1. This encourages a level-playing field for those technologies which take longer to meet the Gate 2 milestone. Transparency of what is reserved will be important and clarity is required as to how embedded projects will be treated.

- **Do you agree with the concept of reserving for undersupply against the CP30 Plan pathway(s) to 2030?**

Yes, SPEN agrees with the concept of reserving capacity for technologies in undersupply following the Gate 2 to Whole Queue exercise. This approach is needed to ensure that technologies required for CP2030, which have yet to meet the Gate 2 readiness criteria have, connection capacity available for them to the extent possible and that the network facilitates the range of technologies required to meet Clean Power 2030 and 2035 ambitions.

- **Do you agree with the circumstances under which NESO could reserve a Connection Point and Capacity for a known project?**

In order to deliver a contracted background which aligns with the CP2030 and other requirements via the Project Designation Methodology, SPEN agrees with the NESO's proposal for circumstances where the NESO could reserve capacity for known projects.

- **Do you agree with the circumstances under which NESO could reserve a Connection Point and Capacity for an as yet unknown project?**

In order to deliver a contracted background which aligns with the CP2030 requirements, SPEN agrees with the NESO's proposal for circumstances where the NESO could reserve capacity, to the extent possible and appropriate, for unknown projects ('placeholder projects'). This is important to ensure that the correct balance of technologies within each network zone is achieved.

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

SPEN consider the approach to reallocating capacity from the 2030 pathway a sensible one. It is logical to consider those projects within the same network zone and deemed to be progressing in the 2035 pathway to consider accelerating their connection date to meet the 2030 pathway.

It is also appropriate to identify projects of the same technology and of similar size to replace previous capacity so that other parties, behind them in the queue, are not significantly

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disadvantaged where additional enabling works are required to facilitate a larger, or different type of connecting technology, in front of them in the queue.

It would be pragmatic to include consideration of embedded projects as replacement projects, where appropriate,

- **Do you agree with the approach to reallocating capacity when 2035 pathway projects exit the queue?**

We agree with the approach proposed in this consultation whereby projects within the 2035 pathway who exit the queue do not have their capacity reallocated, ahead of the implementation of the forthcoming Strategic Spatial Energy Plan (SSEP). We must acknowledge that alignment of the CP2030 scenarios to the TM04+ model is a welcome first step towards Strategic Spatial Energy Planning across the GB network. However, it is just the first step, and it is important that the SSEP, once published, has sufficient flexibility to ensure the post 2035 contracted network background reflects the SSEP's own priorities and ambitions.

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).

We agree with the criteria relating to land rights now that it is being used in conjunction with the CP2030 alignment and the other criteria for Gate 2 entry as it would not be a high enough barrier otherwise to reduce the queue. The use of a clearly defined red line boundary and ensuring it meets the Energy density requirements also enhances clarity.

However, the proposals still promote a rush for land prior to confirmation of the technology caps, some of which is in the immediate vicinity to our strategic substations hindering our ability to deliver future connections. In addition, the proposals do not address BESS projects which have acquired this land potentially changing to demand connection projects.

The issued industry guidance needs to be very specific which documents for land rights can be accepted to validate the numerous land options that are set out within the criteria. In addition, ongoing compliance requirements needs to be very clear.

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<p><i>Please insert your answer here for b).</i></p> <p><i>SPEN agree with the planning criteria within the methodology which will primarily apply for DCO projects within England and Wales, noting that the DCO process is not available in Scotland.</i></p>
<p><i>Please insert your answer here for c).</i></p> <p><i>Yes, SPEN believe that the criteria for the evidence assessment are comprehensive, however, detailed industry guidance needs to be provided to ensure that consistency is applied across all DNOs.</i></p> <p><i>It is not to be underestimated the amount of work involved in checking and validation and the risk of potential disputes and legal challenge placed on the DNOs and NESO.</i></p> <p><i>Given the potential number of Gate 2 applications, and the checking of Gate 2 criteria for Relevant Small/Medium Power Stations, SPEN would be supportive if these applications could be submitted prior to the Gate 2 window opening, however, not assessed until the Gate 2 window opened.</i></p>
<p><i>Please insert your answer here for d).</i></p> <p><i>Yes, the self-declaration form we consider to be an imperative part of the evidence criteria as the onus must be on developers to ensure that they are fully aware of the criteria and take full accountability, and that it is authorised at a high level. It also standardises the format making it a simpler process for validation checks. Accurate and timely completion of the self-declaration form will be critical to ensuring projects are considered for Gate 2.</i></p>

<p>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?</p>
<p><i>Please insert your answer here</i></p> <p><i>Yes, we agree with this in principle in England and Wales, noting that the DCO process is not available in Scotland.</i></p>

Project Designation Methodology

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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?

As the system operator for the electricity transmission network, it is appropriate that the NESO has the powers to designate projects, and provide them with a prioritised queue position, where they bring additional benefits to operation of the network or benefits to the wider GB economy and Net Zero ambitions.

SPEN considers that all of the priority areas set out within the Project Designation Methodology are reasonable and merit further NESO consideration as to whether they should achieve a prioritised queue position. Where there are issues with regards to Security of Supply, System Operation and opportunities to materially reduce generation constraints, we would expect the NESO to be engaging and fully consulting with the relevant TOs, well in advance of taking any decisions on connection point and capacity reservation, competitions for the procurement of network services and any intention to utilise this particular Methodology as a result. Effective implementation of the NESOs Reservation powers under CMP434 and any subsequent use of this methodology and successful mitigation of network issues are best addressed by the relevant TOs and NESO identifying and engaging on network issues at the earliest possible opportunity, learning lessons from the previous Stability Pathfinder 2 exercise where TOs' weren't involved in agreeing the requirement for, or scope of network solutions, which has unfortunately resulted in many challenging issues that have had to be addressed in the connection and delivery of the Stability Pathfinder 2 projects.

SPEN is of the view that those limited number of strategic demand projects, which Government considers as "Strategic Demand", should also fall within the scope of the Project Designation Methodology. If UK Ministers have proactively identified these Strategic Demand projects as having significant benefits to the UK economy, then it feels appropriate that this should be recognised within the connections process, with these Strategic Demand projects being considered for a potential prioritised connection. SPEN believes such an arrangement for "Strategic Demand" projects could be facilitated under the "materially reduce system and/or network constraints" category within the proposed Project Designation Methodology.

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

The proposed criteria does not explicitly refer to Government designated strategic demand service, which SPEN feel could be included under materially reducing system and/or network constraints as above.

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

While generally supportive of the indicative process that NESO has outlined for designating projects, we would like to seek further clarification on several key aspects to ensure our comprehensive understanding and effective implementation.

Firstly, we would emphasise the need to engage with the TO's at the earliest opportunity on NESO Reservation and any subsequent use of this methodology in order to avoid the outcome described above for the Stability Pathfinder 2 competition. In addition, it is not clear when and how NESO intend on seeking advice from other parties in making any designation decision (4.1.3.2). From a TO perspective:

- whether in the case of the TOs this is within area or extends to affected areas,*
- whether this is only part of the 28-day consultation or during NESO's assessment against project designation criteria,*
- and what obligations or expectations will be placed on those parties to respond.*

We would encourage the NESO to expand on their intentions in order for the TOs and other parties to assess the resource requirements of the new process.

SPEN agree with NESO's intention to use this process only in exceptional circumstances, however we wish to highlight the risk that this is one route around the CP2030 technology caps and thus risks creating an administrative burden on NESO and consulted parties. For effective implementation, exceptional circumstances could be further clarified and sufficient barriers to entry put in place (for example, NESO's application fee). We would reference the business case of some BESS projects/operators in seeking to mitigate system constraints as potentially being a source of a large number of designation applications.

The scope of the 28-day consultation period within the indicative process timeline is not clear. SPEN would support that this consultation is extended only to affected parties.

Additional Questions

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

- 1) SPEN remain supportive of the Methodologies sitting outside of the codes with the requirement that the current consultation process is concluded and each Methodology is approved by the Authority. They add flexibility to the TMO4+ arrangements where it remains uncertain what unintended consequences and behaviours reform could drive.*

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It also brings further clarity to the connections process for all stakeholders. However, this is only possible where there is a clear split between the role of the Codes and the Methodologies.

We consider it important that the Methodologies are given time to support the process, and that future updates and consultations are aligned with the application windows. It will also be important to be clear on which versions of the methodologies apply to which windows.

- 2) *NESO has initiated the 'Implementation Hub' in which NESO, TOs and DNOs will coordinate and align the implementation of the reform proposals within our organisations. SPEN is strongly supportive of this development. To implement the methodologies effectively, processes and further clarity, especially with regard to embedded projects, will be required.*
- 3) *Where a DNO has submitted a batch of projects within Project Progression there may have been a delay in the submission of an individual project's application and all projects will have the same Transmission queue position. SPEN understand the argument that some projects will not have a queue position based on the time at which they applied to the DNO. In the SPM area using the countersigned contract date to reorder the queue, could cause potential issues given the Step 2 offers have been issued out of queue order.*

We would highlight that within SPT/SPD's area we have not submitted batched Project Progressions, therefore the combined Transmission and Distribution queue in our areas should be completely transparent and the proposed Methodology for assessing the queue is entirely compatible in our area.