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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	Jessica Savoie
Organisation	The Association for Decentralised Energy (ADE)
Email Address	Jessica.Savoie@theade.co.uk
Phone Number	
Which category best describes your organisation?	<input checked="" type="checkbox"/> Consumer body (<i>Trade Association</i>) <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 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

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☒ No – I am happy for my response to be available publicly

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, the ADE strongly supports aligning the connections process with the Government's Clean Power 2030 Action Plan. This realignment should be done as soon as practicable so that industry (including projects still waiting in the queue) can invest (or divest) and plan accordingly.

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. To be clear, in addition to directly connected demand projects outside the scope of the CP30 Plan, the ADE believes strategic demand decarbonisation projects be considered as possible "NESO Designated Projects."

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, the ADE agrees with NESO that the reformed connections queue should be strategic and prioritise demand projects. And an all 'ready' queue could be a step backwards and inject uncertainty into the market. However, overall design 3 could be a suitable alternative if Government's Clean Power 2030 Action Plan does not include a 2031–2035 pathway.

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, and with haste.

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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
<p><i>Mostly yes, we agree. We'd like to note that NESO's CP30 report also includes decarbonising demand (or meeting demand in a decarbonised way); and therefore, the ADE believes distribution connected demand (i.e. industrial and commercial users) that want to decarbonise via electrification should be given strategic status and considered within connections reform aligning with CP30.</i></p> <p><i>Regarding variable 9, while the ADE would have liked to see all of these reforms apply to both transmission and distribution, the ADE is happy to see NESO proposing the reformed connections process and queue align with the technology, capacity and regional requirements for Government's CP30 Plan at both a transmission and distribution level.</i></p> <p><i>Under variables 9 and 10, we're also pleased that NESO recommends to Government that: the CP30 Plan include capacity requirements for different technologies connecting at transmission and distribution; the pathways within the CP30 Plan (to 2030 and to 2035) clearly separate the proposed mix of transmission and distribution technologies, by capacity and location; and Distribution Network Operators (DNOs) determine the 'ready' projects within their Distribution Services Area which align with the distribution mix set out within the pathways in Government's CP30 Plan.</i></p> <p><i>Also, see our answer to Q8 regarding variable 6.</i></p>
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
<i>Yes, although at the moment it feels a little convoluted. We are eager to see the methodologies in practice.</i>
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
<i>No answer from the ADE.</i>

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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**

On variable 6, we think NESO should anticipate a higher rate of attrition than it currently does (given legal challenges to planning applications and general planning delays etc.) and therefore not be so stringent on whether or not a cancelled 2031–35 pathway project should be replaced. With so many projects in the current queue, there should be enough ‘like-for-like’ projects to choose from. While ‘the [cancelled] project will not be replaced automatically,’ a cancelled 2031–35 pathway project should have the presumption of being replaced in a timely way; and if the cancelled project is not replaced, NESO should provide reasoning as to why non-replacement furthers our CP30 or Net Zero goals.

Of course, NESO should be able to decline replacement of cancelled projects for any number of reasons (one reason for example is that release of SSEP1 is imminent and NESO would like to pause to see if other kinds of projects are needed/needed elsewhere in the country), but for the sake of achieving our goals as quickly as possible, the presumption should be replacement.

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. The ADE is happy to see that DNOs will be responsible for applying the Gate 2 Readiness and Strategic Alignment Criteria to relevant projects in the existing distribution queue and future application windows as well as aligning the existing and future distribution queue to the CP30 Plan.

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.

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

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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)

a) Yes

b) Yes

c) Yes

d) Yes

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?

No answer from the ADE.

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, we are particularly pleased to see projects that are critical to Security of Supply (for our CHP members) and that materially reduce system and/or network constraints (for our demand-side response members) are included.

The ADE would like for NESO to make clear that both generation and strategic demand projects are able to achieve designation status (acknowledging that designation status will be inherently rare).

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. There seems to be enough flexibility built in and 6 months between application and published decision seems reasonable. The designation process and decision will primarily happen in advance of application to Gate 2; however, NESO can designate a project during

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Gate 1 or potentially beyond Gate 2. The ADE strongly supports NESO publishing all designation decisions (positive or negative) along with reasons for that decision. The ADE also supports NESO giving applicants the right of appeal.

Additional Questions

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

No answer from the ADE.