

Workgroup Consultation Response Proforma**CMP434: Implementing Connections Reform**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to cusc.team@nationalgrideso.com by **5pm on 06 August 2024**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Robert Boswall	
Company name:	Last Energy UK Ltd	
Email address:	rboswall@lastenergy.com	
Phone number:	+44 77 152 72 658	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" 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

I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration)

For reference the Applicable CUSC (non-charging) Objectives are:

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;
- Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and
- Promoting efficiency in the implementation and administration of the CUSC arrangements.

*The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions				
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe the Original solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input checked="" type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> </table> <p>Last Energy welcomes and supports CMP434, in particular the emphasis on first ready first served, the goal of decarbonising the grid, and the plans for the ESO's power to accelerate queue positions for critical projects.</p>	Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D
Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D			
2	Do you support the proposed implementation approach? (see pages 59-61)	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>With the caveat that projects which are shovel ready for a Gate 2 application should be able to be made at any time of year.</p>		
3	Do you have any other comments?	<p>Last Energy is a developer, owner, operator of micro-modular nuclear energy plants ("the PWR-20"). Each PWR-20 delivers clean, reliable, baseload electricity at 20MWe per unit with the potential for multiple units per project. Last Energy is working to deliver power over the grid by 2028 to serve our customer Power Purchase Agreements. To this end Last Energy sites flexibly wherever the fastest connection can be secured.</p>		
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/>Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>		

Specific Workgroup Consultation questions			
5	<p>Do you agree with the elements of the proposed solution? Element 7 has been de-scoped and Element 10 is proposed to be codified within the STC through modification CM095. Please provide rationale for your answer and any suggestions for improvement to each element?</p> <table border="1"> <tr> <td>Element 1: Proposed Authority approved methodologies and ESO guidance (see pages 9-10, 55)</td> <td><input checked="" type="checkbox"/>Yes</td> </tr> </table>	Element 1: Proposed Authority approved methodologies and ESO guidance (see pages 9-10, 55)	<input checked="" type="checkbox"/> Yes
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	<input type="checkbox"/> No
Click or tap here to enter text.	
Element 2: Introducing an annual application window and two formal gates, which are known as Gate 1 and Gate 2 (i.e. the Primary Process) (see pages 11, 35-36)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Projects which are shovel ready for a Gate 2 application should be able to be made at any time of year not just during Gate 1 application windows.	
Element 3: Clarifying which projects go through the Primary Process (see pages 11-12, 35-36)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
Element 4: Significant Modification Applications concept, including the proposed criteria and the proposed level of codification (see pages 12-13, 36-39)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
There is little clarity around what will be considered a Significant Modification Application. When such applications are being assessed the modifications should be considered in the context of whether they help or hinder the goals of a reliable, expanded, and decarbonised electricity grid.	
Element 5: Clarifying any Primary Process differences for customer groups (see pages 13-14, 35-36)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Distributed Forecasted Transmission Capacity (DFTC) submissions should allow the ESO to give preference to Small and Medium Power Stations which provide consistent and reliable power. High-capacity factor generation assets increase the efficiency of transmission and distribution assets by utilising the same capacity to deliver a large quantum of electricity. This will reduce the cost of the system and accelerate energy delivery.</p> <p>Projected lifetime of the generating asset - longer lasting assets will better support the grid's energy delivery goals, and reduce the cost of the transmission and distribution system by avoiding reconnections and</p>	
Element 6: Setting out the process and criteria in relation to Application Windows and Gate 1, including introducing an offshore Letter of Authority equivalent as a Gate 1 application window entry requirement for offshore projects (see pages 15-16, 39-40)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Last Energy hopes that the implementation of first come first served takes into account all degrees of readiness on a project-by-project basis. This will encourage developers to adopt their own risk so as to progress projects as quickly and surely as possible.</p> <ul style="list-style-type: none"> The securing of key licences and permits should be taken into account (in the case of Last Energy this would include a Nuclear Site Licence and an Environmental Permit for a nuclear operating station). 	

<ul style="list-style-type: none"> Increasing degrees of site control (Letters of Authority then site options then executed free or leaseholds) should increase the speed of connection dates on a proportionate basis. Finally project willingness to adopt connection costs, present full site plans, including easements and access to the proposed substation, should also be grounds on which to accelerate connection dates. 	
Element 7: Fast Track Disagreement Resolution Process (de scoped from this modification – see pages 16, 58)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
Element 8: Longstop Date for Gate 1 Agreements (see pages 16, 40-41)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
Element 9: Project Designation (see pages 17-18, 48-49)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Last Energy welcomes and supports CMP434, in particular the emphasis on first ready first served, the goal of decarbonising the grid, and the plans for the ESO's power to accelerate queue positions for critical projects.</p> <p>Our consultation response will focus on advocating for certain generating asset and energy project characteristics that support the goal of increased delivery of grid decarbonisation and energy delivery to be taken into account when considering connection prioritisation. These considerations could be built into the Queue Management Milestone considerations, into the Connections Network Design Methodology.</p> <ul style="list-style-type: none"> Projected lifetime of the generating asset - longer lasting assets will better support the grid's energy delivery goals, and reduce the cost of the transmission and distribution system by avoiding reconnections and Low carbon generation assets - the benefits to decarbonising the grid are self-evident. High capacity factor generation assets - increases the efficiency of transmission and distribution assets by utilising the same capacity to deliver a large quantum of electricity. This will reduce the cost of the system and accelerate energy delivery. Inherent system support - certain assets by their normal operations or through contracted services support the safe and reliable operation of the transmission and distribution grid. Examples include fast response battery assets providing frequency response, spinning mass turbines providing inertia, black start capable stations, baseload generation providing network capacity. Locational support - the work on spatial system planning must be collaborative between the system operator and the broader industry. Generation that fulfils the locational needs of the Transmission and 	

<p>Distribution system should be prioritised and to this end these needs should be clearly defined and communicated.</p> <p>Last Energy further advocates that generation sources which fulfil multiple of these criteria should be prioritised on the basis of the combination of benefits being more valuable than the sum of the benefits.</p> <p>Last Energy hopes that the implementation of first come first served takes into account all degrees of readiness on a project-by-project basis. This will encourage developers to adopt their own risk so as to progress projects as quickly and surely as possible.</p> <ul style="list-style-type: none"> • The securing of key licences and permits should be taken into account (in the case of Last Energy this would include a Nuclear Site Licence and an Environmental Permit for a nuclear operating station). • Increasing degrees of site control (Letters of Authority then site options then executed free or leaseholds) should increase the speed of connection dates on a proportionate basis. • Finally project willingness to adopt connection costs, present full site plans, including easements and access to the proposed substation, should also be grounds on which to accelerate connection dates. 	
<p>Element 10: Connection Point and Capacity Reservation (proposed to not be codified within the CUSC, but is intended to be codified within the STC through modification CM095 – see pages 18-20 and the CM095 Workgroup Consultation, pages 6-10)</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>Element 11: Setting out the criteria for demonstrating Gate 2 has been achieved and setting out the obligations imposed once Gate 2 has been achieved (see pages 20-24, 42-46)</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>Last Energy hopes that the implementation of first come first served takes into account all degrees of readiness on a project-by-project basis. This will encourage developers to adopt their own risk so as to progress projects as quickly and surely as possible.</p> <ul style="list-style-type: none"> • The securing of key licences and permits should be taken into account (in the case of Last Energy this would include a Nuclear Site Licence and an Environmental Permit for a nuclear operating station). • Increasing degrees of site control (Letters of Authority then site options then executed free or leaseholds) should increase the speed of connection dates on a proportionate basis. • Finally project willingness to adopt connection costs, present full site plans, including easements and access to the proposed substation, should also be grounds on which to accelerate connection dates. 	

Element 12: Setting out the general arrangements in relation to Gate 2 (see pages 25-26, 47)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>"It is the current intention to consider applications for Gate 2 in groups at regular intervals" a project which is shovel ready must be able to be made at any time during the year so that they can be progressed at pace.</p>	
Element 13: Gate 2 Criteria Evidence Assessment (see pages 26-27, 47-48)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
Element 14: Gate 2 Offer and Project Site Location Change (see pages 28, 46)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
Element 15: Changing the offer and acceptance timescales to align with the Primary Process timescales (e.g. a move away from three months for making licenced offers) (see pages 29, 42-46)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
Element 16: Introducing the proposed Connections Network Design Methodology (CNDM) (see pages 29, 53-55)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Certain generating asset and energy project characteristics that support the goal of increased delivery of grid decarbonisation and energy delivery to be taken into account when considering connection prioritisation. These considerations could be built into the Queue Management Milestone considerations, into the Connections Network Design Methodology.</p> <ul style="list-style-type: none"> • Projected lifetime of the generating asset - longer lasting assets will better support the grid's energy delivery goals, and reduce the cost of the transmission and distribution system by avoiding reconnections and • Low carbon generation assets - the benefits to decarbonising the grid are self-evident. • High capacity factor generation assets - increases the efficiency of transmission and distribution assets by utilising the same capacity to deliver a large quantum of electricity. This will reduce the cost of the system and accelerate energy delivery. • Inherent system support - certain assets by their normal operations or through contracted services support the safe and reliable operation of the transmission and distribution grid. Examples include fast response battery assets providing frequency response, spinning mass turbines providing inertia, black start capable stations, baseload generation providing network capacity. • Locational support - the work on spatial system planning must be collaborative between the system operator and the broader industry. Generation that fulfils the locational needs of the Transmission and Distribution system should be prioritised and to this end these needs should be clearly defined and communicated. 	

<p>Last Energy further advocates that generation sources which fulfil multiple of these criteria should be prioritised on the basis of the combination of benefits being more valuable than the sum of the benefits.</p>	
<p>Element 17: Introducing the concept of a Distribution Forecasted Transmission Capacity (DFTC) submission process for Distribution Network Operators (DNOs) and transmission connected Independent Distribution Network Operators (iDNOs) to forecast capacity on an anticipatory basis for Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations aligned to the Gate 1 Application Window (see pages 30-33, 51-53)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Certain generating asset and energy project characteristics that support the goal of increased delivery of grid decarbonisation and energy delivery to be taken into account when considering connection prioritisation. These considerations could be built into the Queue Management Milestone considerations, into the Connections Network Design Methodology.</p> <ul style="list-style-type: none"> • Projected lifetime of the generating asset - longer lasting assets will better support the grid's energy delivery goals, and reduce the cost of the transmission and distribution system by avoiding reconnections and • Low carbon generation assets - the benefits to decarbonising the grid are self-evident. • High capacity factor generation assets - increases the efficiency of transmission and distribution assets by utilising the same capacity to deliver a large quantum of electricity. This will reduce the cost of the system and accelerate energy delivery. • Inherent system support - certain assets by their normal operations or through contracted services support the safe and reliable operation of the transmission and distribution grid. Examples include fast response battery assets providing frequency response, spinning mass turbines providing inertia, black start capable stations, baseload generation providing network capacity. • Locational support - the work on spatial system planning must be collaborative between the system operator and the broader industry. Generation that fulfils the locational needs of the Transmission and Distribution system should be prioritised and to this end these needs should be clearly defined and communicated. <p>Last Energy further advocates that generation sources which fulfil multiple of these criteria should be prioritised on the basis of the combination of benefits being more valuable than the sum of the benefits.</p>	
<p>Element 18: Set out the process for how DNOs and transmission connected iDNOs notify the ESO of Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations which meet Gate 2 criteria (see pages 33-34, 51-53)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
6	<p>Are there any elements of the proposal which you</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

	believe should not be included as part of this proposed solution, which the Proposer believes represents the 'Minimum Viable Product' reforms required to the connections process? If not, why not? (Please note the element number in each of your responses if applicable)	
Click or tap here to enter text.		
7	As per question 6, are there any additional features which you believe should be included as part of Minimum Viable Product reform to the connections process?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Click or tap here to enter text.		
8	Do you agree that the Gate 1 process should be a mandatory process step, or do you think Gate 1 should be an optional process step with projects being able to apply straight into the Gate 2 process if the project meets both the relevant Gate 2 and Gate 1 criteria?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Gate 1 must not be a mandatory step this will significantly delay shovel ready projects as they will have to wait for the annual application window. A project which is shovel ready must be able to be made at any time during the year so that they can be progressed at pace.		
9	Do you believe that the proposed Gate 1 and Gate 2 process could duly or unduly discriminate against any types of projects? If so, do you believe this is justified?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Should duly discriminate in favour of certain generating asset and energy project characteristics that support the goal of increased delivery of grid decarbonisation and energy delivery to be taken into account when considering connection prioritisation. These considerations could be built into the Queue Management Milestone considerations, into the Connections Network Design Methodology.		

	<ul style="list-style-type: none"> • Projected lifetime of the generating asset - longer lasting assets will better support the grid's energy delivery goals, and reduce the cost of the transmission and distribution system by avoiding reconnections and • Low carbon generation assets - the benefits to decarbonising the grid are self-evident. • High capacity factor generation assets - increases the efficiency of transmission and distribution assets by utilising the same capacity to deliver a large quantum of electricity. This will reduce the cost of the system and accelerate energy delivery. • Inherent system support - certain assets by their normal operations or through contracted services support the safe and reliable operation of the transmission and distribution grid. Examples include fast response battery assets providing frequency response, spinning mass turbines providing inertia, black start capable stations, baseload generation providing network capacity. • Locational support - the work on spatial system planning must be collaborative between the system operator and the broader industry. Generation that fulfils the locational needs of the Transmission and Distribution system should be prioritised and to this end these needs should be clearly defined and communicated. <p>Last Energy further advocates that generation sources which fulfil multiple of these criteria should be prioritised on the basis of the combination of benefits being more valuable than the sum of the benefits.</p>
10	<p>Please provide your views on the proposed options ((a) to (e) on page 45) to mitigate the risk of requiring a developer to submit their application for planning consent earlier than they would in their development cycle (with the risk this consent could expire and any extension from the Planning Authority is not automatic).</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
11	<p>Do you agree that DFTC should be included as part of CMP434? If not, do you believe that the reformed connections process can function without DFTC? Please justify your answer. (see pages 30-34, 51-53)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Yes, so long as connection projects can be progressed as pace and not wait for the DFTC to be finalised, updated, or changed. It should be a reference document, a guide, not enforceable or the only source of truth.</p>	

12	<p>The Proposer intends to set out supporting arrangements for TMO4+ via a combination of guidance and methodologies (e.g. DFTC, CNDM, Project Designation, Gate 2 Criteria). Do you anticipate any issues with having these outside of Code Governance? (see Pages 9-10, 55)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>		