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 **2nd December 2024**.

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

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| Respondent Details |  |
| Name | Rupinder Pamme |
| Organisation | AirportsUK |
| Email Address | rupinderpamme@airportsuk.org |
| Phone Number |  |
| Which category best describes your organisation? | Consumer body  Demand  Distribution Network Operator  Generator  Industry body  Interconnector  Storage  Supplier  System Operator  Transmission Owner  Virtual Lead Party  Other |
| Is this response confidential? | Yes – I do not wish for this response to be shared publicly; however I understand it will be shared with Ofgem  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**

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| 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** |
| *Please insert your answer here* |

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| 1. 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** |
| *Please insert your answer here* |

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| 1. 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** |
| *Please insert your answer here* |

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| 1. 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** |
| *Please insert your answer here* |

**Implementation Questions**

You can find the relevant information in the **Great Britain's Connections Reform: Overview Document**

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| 1. 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** |
| *Please insert your answer here* |

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| 1. 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** |
| *Please insert your answer here* |

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| 1. 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** |
| *Please insert your answer here* |

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| 1. 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** |
| *Please insert your answer here* |

**Connections Network Design Methodology**

You can find the relevant information in the [**Connections Network Design Methodology - Detailed Document**](https://www.neso.energy/document/346666/download)

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| 1. 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? |
| *Please insert your answer here* |

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| 1. Do you agree with the approach to managing advancement requests? |
| *Please insert your answer here* |

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| 1. Do you agree with the approach to reserving Connection Points and Capacity at Gate 1? |
| *Please insert your answer here* |

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| 1. Do you agree with the approaches to reallocating capacity when 2030 pathway projects and 2035 pathway projects exit the queue? |
| *Please insert your answer here* |

**Gate 2 Criteria Methodology**

You can find the relevant information in the [**Gate 2 Criteria Methodology- Detailed Document**](https://www.neso.energy/document/346656/download)

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| 1. Do you agree with the following elements of this Gate 2 Criteria Methodology?    1. Gate 2 Readiness Criteria – Land (Chapter 4)    2. Gate 2 Readiness Criteria – Planning (Chapter 5)    3. Gate 2 Criteria Evidence assessment (Chapter 8)    4. Self-Declaration Templates (Chapter 9) |
| *Please insert your answer here for a).* |
| *Please insert your answer here for b).* |
| *Please insert your answer here for c).* |
| *Please insert your answer here for d).* |

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| 1. 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? |
| *Please insert your answer here* |

**Project Designation Methodology**

You can find the relevant information in the [**Project Designation Methodology - Detailed Document**](https://www.neso.energy/document/346661/download)

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| 1. Do you agree that the categories of projects that we have identified are the appropriate ones to potentially be designated? |
| *Please insert your answer here* |

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| 1. Do you agree with the proposed criteria for assessing Designated Projects? |
| *Please insert your answer here* |

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| 1. Do you agree with the indicative process NESO will follow for designating projects? |
| *Please insert your answer here* |

**Additional Questions**

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| 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*  **About AirportsUK**  This response is submitted on behalf of AirportsUK, the trade association representing the interests of airports across the UK. AirportsUK represents more than 50 airports and is the principal body engaging with the UK Government, Parliamentarians, and regulatory authorities on airport matters.  **The UK Airport Sector**  Airports are engines of growth and aviation contributes more than £92bn to the economy, supports a million jobs and provides more than £8 billion in tax revenues to the Exchequer. It is important to emphasise that aviation provides essential connectivity for exporters, inward investors and other business travellers. Two-fifths of the UK’s intercontinental trade by value travels by air.  **Introduction**  AirportsUK welcomes this consultation and its statement that there is “clear and urgent need to reform” the connection process as projects take too long to come to the electricity grid. We agree with the premise outlined by NESO that it will be reforming the connections queue for a project by “readiness” relating that the project is viable by securing land and planning rights, and “strategic alignment” within the Government’s pathway to its Clean Power 2030 Action Plan in relation to technology, capacity and location, at transmission and distribution. We agree that so called “zombie projects” that have no hope for fruition need to be removed so they do not block those who have viable projects in place.  This consultation is looking at generation connection (not demand), at both transmission and distribution level, which we will address in our short response. As a trade association we wish to provide some key principals and views from our membership answering in the additional question section. Our airports will be best able to answer the individual questions in the form, as they are the users, and potentially the suppliers, of the electricity that is required.  **Response to the consultation**  ***Generation connection projects at airports***  Airports have made great strides in decarbonising their operations, particularly energy consumption through electricity generation. This is predominantly solar photovoltaic energy generation, though some wind and energy-from-waste generation is also in use at UK airports.  As examples:   * Edinburgh Airport has constructed a solar farm at the end of the runway, and it will generate around 25% of the airport's energy needs. * Birmingham Airport energised a 6.8MW PV array in the summer which is expected to generate around 20% of its power requirement. * Newcastle International Airport has completed phase 1 of its solar farm, a 3MW system, which is capable of generating 100% of the airports power requirement on a sunny day. The airport has planning permission to expand their solar farm up to 16MW, and it is urgently seeking a grid connection agreement with increased export capacity in order to progress this net zero scheme. * London Stansted Airport received planning permission from the Secretary of State for the development of a solar farm on land already owned by Stansted immediately to the east of the airport. The development is designed to meet the airport’s current and increasing electricity demands, including from the growing use of electric vehicles, and is in keeping with the airport’s commitment to make its operations net zero carbon by no later than 2038.   We would note that the previous Government considered singling out airports for different treatment on decarbonisation to the rest of commercial premises (the Zero Emission Airport Target). This means airports being supported in energy generation projects as solar farms become even more crucial if this target is to be met. There should be sector level prioritisation for hard to abate sectors, such as aviation so its applications are prioritised over others in order to be able to maximise decarbonisation and thus achieve policy objectives.  ***Assessment of Proposals***  Our members agree with NESO’s intention to align the connections process to Government’s Clean Power 2030 Action Plan. This should accelerate grid decarbonisation and assist airports where they have projects ready that align to Clean Power 2030 Action Plan criteria (e.g. large-scale net zero capital projects) – these should be very clearly prioritised in the connections queue. We would also strongly agree with the approach of reallocating and prioritising capacity from exiting projects to viable net zero project. We have members who have stated that overall design 2 conveys this well.  Our members highlighted that in the consultation there is no reference to Critical National Infrastructure, such as airports, and whether there would be consideration to prioritise such assets over others within the plan.  ***Demand***  Connections for generation is a major issue, but more frequently an issue for airports is connections for demand. For example, for airport operations decarbonisation includes investing in zero-emission heating and power systems, zero-emission vehicles and ground equipment, and charging for site, staff and public electric vehicles. This is separate to the need to support decarbonisation of aviation through possible fuel creation on or near site (power to liquid Sustainable Aviation Fuel, or hydrogen) and powering electric planes, which have the potential to create significant new demand within the near future. This will become a critical issue to the decarbonisation of aviation, the focus for the Government’s new Jet Zero Taskforce.  ***Networks***  Airports also highlighted that the situation around network upgrades should be included in the consultation as this as a major block in moving projects forward. For example, the current system/equipment upgrades required for release of extra capacity in local area networks at multiple airports is not due until the end of the decade. Other airports report restrictions on the ability to export power to grid, limiting the size of solar farms that can be developed rather than further supporting the decarbonisation of grid power, and limiting the amount of energy that can be offset. |