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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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Which category best describes your organisation?	<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 checked="" 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**

In principle, Getlink supports the ambition to align the connection process to the Government's Clean Power 2030 Action Plan (CP30/35), and subsequently the Strategic Spatial Energy Plan (SSEP), in order to achieve a connection queue which is in line with the decarbonisation needs of Great Britain. In addition, Getlink firmly supports the introduction of clear and public government targets per technology as recommended by NESO. However, we do have reservations regarding the proposed implementation approach and its potential implications for viable and beneficial projects at the expense of the GB consumer. Due to the lack of visibility over the Government's Clean Power action plan, with only NESO's recommendations having been published to date, and the following SSEP, which is not due to be published until late 2026, it is difficult to comment on this alignment in any level of granularity. We would therefore welcome the opportunity for further industry involvement once these plans have been published.

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**

Although Getlink agrees that the queue should be first formed of projects which are both ready and strategically aligned (ruling out Overall Design 1), Getlink does not support the removal of all projects which are not strategically aligned from the queue entirely. As such, our recommendation for the overall design most closely aligns to Overall Design 3. We recommend Design 3 primarily as we believe it is most in line with consumer interests, given the legacy of the first come first served approach and the speculative/unviable projects that exist in all areas of the connection queue.

There exists evidence of projects situated relatively early in the queue which may meet the Gate 2 land requirements but are completely unviable based on other project metrics (regulation, views of the connecting market, project economics etc) whilst significantly more viable projects are held to the back of the queue. Due to the proposed approach to strategic alignment with CP30, whereby projects retain their relative queue position and all projects

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beyond CP35 requirements are removed from the queue, there is a risk that these earlier unviable projects are maintained within the queue at the expense of later viable projects solely as a result of their relative queue position, as determined by an outdated and soon to be obsolete connection process.

To retain the viability of these later projects they must continue to be considered within the queue. Following the proposed Overall Design 2 approach, the earlier unviable projects will only be removed very slowly once Queue Management milestones begin to be missed. During this time the later viable projects will be seeking to maintain their development with indicative offers and no firm queue position and, as a result, may become stagnant prior to the unviable projects dropping out of the queue. This slow removal of historical and unviable projects at the risk of later viable projects cannot be in the interests of GB consumers and will impact the achievability of both CP30, the SSEP and wider Government ambitions. We therefore advocate for Overall Design 3, at least initially, until all the truly unviable projects are removed from the connections queue.

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**

As outlined in our response to Question 2, we believe that all "ready" projects should be included in the connections queue. We believe that these projects should be included due to the historic nature of the current queue formation and the need to maintain viable projects later in the queue due to the high probability of a significant number of "ready" but unviable projects requiring termination.

Whilst we understand that the full details of the SSEP cannot be accurately predicted today, as the SSEP will be developed within the next 2 years and given that the CP30/35 should be complementary to any further developments to meet our overall decarbonisation ambitions, we do not foresee a scenario where the introduction of the SSEP is drastically different to the current path to net zero. Moreover, as any viable project should be able to clearly demonstrate significant benefits to GB consumers, we do not envisage any likely circumstances which would eliminate these project benefits over the next two years. As such, any SSEP which is developed should seek to advance these beneficial projects and in doing so protect both consumer and developer interests.

Additionally, whilst there will remain a small risk that a project outside of CP30/35 is impacted by the introduction of the SSEP we believe that this risk would be preferable and easier for a project developer to manage than a removal from the connection queue entirely. We understand that the complete lack of certainty that Option 2 would provide for these "ready" projects (at least until the end of 2026) would have greater consequences for the viability and

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progress of these projects than the potential risk of a future SSEP change as provided for under Overall Design 3.

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**

Getlink supports the extension of the scope of the queue until 2035 as a minimum. We welcome NESO's recognition that 10 years investment certainty is required to support project developers of large-scale projects, for example the development and construction processes for an interconnector project takes at least 8 years on average. However, we also advocate that 2035 should not act as a cliff edge whereby all projects which are due to connect past that date may have insufficient certainty to continue to progress and could instead stagnate, or at worst, cease entirely due to the lack of certainty provided. This effect would be worsened for projects which are viable to connect prior to 2035 and would deliver significant benefits for GB consumers within that timescale but are unable to due to their respective queue position behind potentially less viable or beneficial projects. To protect consumer interests and maintain the viability of these beneficial projects NESO must determine a way to provide these developers with greater certainty until the SSEP is published or enhance the speed at which non-viable projects are removed from the queue.

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**

We have provided our commentary on the preferred options against each variable in turn below:

1. *Time horizon for determining "aligned" project:* In line with our response to Question 4, we believe that the queue should extend to 2035 as a minimum to ensure that there is sustained momentum beyond 2030, preventing a cliff edge for projects in the 2035-2040 period.
2. *Approach for managing scope of the new queue:* In line with our response to Question 2 and Question 3, we support the prioritisation of CP30/35 aligned projects followed by all other "ready" projects.

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3. *Approach for demand projects:* Getlink has no views to share on this variable.
4. *Approach to oversupply:* Getlink considers limits aligned to CP30/SSEP as preferable to the status quo or limits based on outdated government targets. However, as outlined within our response to Question 2, sufficient certainty needs to be provided to the projects within the oversupplied capacity to enable them to continue developing. This certainty is required for these projects to be ready to take the queue position of earlier projects which are terminated following a failure to meet Queue Management milestones.
5. *Approach to undersupply:* Getlink broadly supports NESO's preferred options, however, we do question whether the requirement for an adjacent location is always applicable or if in certain cases this would create an unnecessary limitation. We also hold that whilst there will be cases where a like for like technology replacement would be preferable, NESO should retain the flexibility to consider whether the benefits offered by the technology could be adequately met by an alternative (or combination of alternative) technology type/s for which there are "ready" projects.
6. *Approach to project attrition:* Getlink supports the replacement of attrition within the 2030 pathway with projects from the 2035 pathway. Whilst we recognise the hesitation to replace attrition within the 2035 pathway with projects post 2035 due to the potential prevalence of underlying negative market drivers, we believe that in the vast majority of cases this attrition will instead result from project specific drivers. We therefore believe that the replacement of 2035 pathway projects should be feasible in cases where evidence can be provided that the same factors would not/do not impact the post 2035 replacement project. Given the historic nature of the queue and the potential volume of capacity which may be removed through the Queue Management Milestones, this process will be critical to achieving the 2035 pathway targets. We provide further detail on our position on this topic within our response to Questions 8 and 12.
7. *Optimal use of the network:* Recognising that further studies are required, Getlink's initial view is that Option 1, of allowing any project of any size to connect at any substation/bay, should maximise flexibility. However, we would welcome the opportunity for further industry commentary once NESO's review has been completed.
8. *Transition to SSEP:* In line with our response to Question 3, we believe developers of projects which are due to connect post 2035 would be better set up for progress where some provisions are made for post 2035 projects even if there remains a small risk of change via the SSEP. We therefore disagree with NESO's preference for Option 1 and instead recommend Option 2.
9. *Alignment to Transmission & Distribution:* We agree that both transmission and distribution projects should be in scope.
10. *Spatial element to CP30 alignment:* We agree that any spatial element within the reform would be better aligned with CP30 zones rather than FES zones and recognise that these zones could be beneficial for many technologies. We would, however, strongly encourage a national approach to offshore projects given that the offered point of connection (as set through the NESO connection process) is the primary determinant of an offshore project's location.

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11. *New queue order*: Whilst Getlink largely supports NESO's approach to queue ordering we have specific concerns regarding the proposed approach for offshore projects and capacity reservations. We have provided further detail of these concerns within our responses to Questions 9, 11 and 12.

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**

Overall, Getlink believe that the arrangements set out in Section 3 will largely deliver against the preferred options set out by NESO. We do, however, note that Section 3 includes reference to the potential introduction of a financial instrument. Getlink have provided a separate response to the *NESO Call for Input: Financial Instrument Proposal* and highlighted the risks that such an instrument would introduce for private developers of large scale projects. Given the size of this risk and the impact it would have on the level of competition in large scale technologies, such an instrument would limit the effectiveness of the methodologies in delivering against not only the preferred options but also the overall targets of the CP30/35 alignment.

We also wish to take this opportunity to promote caution with the speed at which the Gate 2 Criteria to Whole Queue process is conducted. Given the size and historic nature of the queue, with the prevalence of unviable projects at all stages, such an exercise will have significant and long-lasting impacts on both individual projects and the overall system. Careful consideration of the implementation timing will be critical to ensure that this exercise is concluded effectively and that developers of truly viable projects have the opportunity to adequately prepare. We would therefore recommend that NESO reconsiders its ambitious timeline and reviews whether a short extension to the timing of the Gate 2 to Whole Queue exercise would lead to improved long term results.

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**

As detailed within various of our responses to the above questions, we firmly believe that the complete lack of certainty for projects post 2035 will undermine our ability to meet the capacity required per technology type to deliver against the CP30/35 targets. It is crucial that there is sustained momentum in the development of assets before and beyond 2030. Without any provisions for projects post 2035, we fear that these projects will struggle to adequately progress due to the lack of stability and confidence that will be required for significant investments. Failure to do so may mean that there are insufficient projects to fulfil the space of project attrition within the 2035 pathway or remain viable for connection within the SSEP pathway.

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We also have concerns that the Gate 2 criteria paired with the Queue Management milestones will not remove unviable projects at a pace fast enough to retain the viability of the projects which fall outside of the 2035 pathway. It seems clear that across some technologies there exist projects which will meet the Gate 2 Land Criteria due to historic arrangements (or in the case of Offshore projects are likely to receive Gate 1 reservations) and occupy a sufficiently advanced queue position to be captured within the CP35 pathways (demonstrating Gate 2 Strategic Alignment) that have already stagnated and in all scenarios will not progress further. On the other hand, there are likely to exist projects (with or without land) which are in earlier stages of development which are situated further back in the queue and so do not meet Strategic Alignment but are more viable to progress towards delivery. Whilst we understand that these relative queue positions have been born out of the historic “first come first served approach” to the connections process, we do not envisage any strong justification to maintain these relative positions if such an approach may risk viable “ready” projects behind projects which have stagnated outside the connections process. As such there is a risk that these unviable projects will progress through Gate 2, fill the CP35 technology buckets and only slowly come to be removed from the queue once the Queue Management Milestones start to be missed. Whilst waiting for the termination of these unviable projects the later viable projects may struggle to contend with the lack of certainty provided for post 2035 Gate 1 projects and could ultimately become unviable themselves. We therefore advise that the lack of certainty offered to projects post 2035 is reconsidered and Queue Management Milestones are applied rigidly and at pace so that the viability of these later projects can be maintained.

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**

Building on our response to Question 5, whilst we support the project attrition arrangements between 2025 and 2030 we also believe that the same arrangements should be extended to the 2031–2035 pathway. Although we appreciate the concerns regarding SSEP alignment and potential signal of insufficient market drivers we believe that in the vast majority of cases project attrition across both pathways will result from project specific drivers, including a lack of commitment to the project, rather than any indication of wider market signals. As explained elsewhere in our responses, we also do not envisage the SSEP diverging to the CP30/35 plan to such a significant degree for there to be any negative consequences associated with bringing forward post 2035 projects, which are viable to connect with accelerated timescales, into the 2035 pathway. Instead, if this acceleration of projects is not feasible, there is a significant risk that the CP35 pathway may not be met given the volume of projects which may be removed from the queue via the Queue Management Milestones.

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In particular, we are aware of a large capacity of potentially “zombie” projects existing within the Interconnector TEC Register which, whilst they may be maintained through the Gate 2 to Whole Queue Process (due to relative early queue position and the provision for offshore reservations), are ultimately unviable and will eventually be removed from the queue either once their deadline for demonstrating Gate 2 compliance is reached or once their Queue Management Milestones fail to be met. In this case these interconnector terminations will result solely from the project and developer characteristics not due to wider market drivers nor misalignment with the SSEP. Other viable and progressing interconnector projects which are pushed outside of the CP35 bucket must be accelerated following these terminations if the interconnector target of 23.7GW by 2035 is to be met. By their very nature it should be expected that “zombie” projects which are carried into the CP30/35 buckets will be slow and difficult to remove from the queue, whereas viable and progressing projects later in the queue would be able to accelerate ahead of their existing connection date very quickly. Given the volume of stalled and speculative projects within the interconnector and OHA queue, the level of likely terminations will result in a significant shortfall in delivery against the target unless post 2035 interconnector projects are available for acceleration.

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?

Whilst Getlink supports the overall approach to applying the Gate 2 Readiness criteria and Gate 2 Strategic Alignment Criteria to the existing queue and future Gate 2 Tranches, including the combined methodology of queue position and planning considerations for most technologies, Getlink has concerns about the specific approach to offshore projects.

Firstly, Getlink queries the rationale for delaying offshore projects to the end of the 2030 and 2035 pathways with the presented logic seeming to indicate that this delay behind other technologies is purely based on easing the process for NESO. Whilst it is understood that there may be efficiencies to be gained through undertaking CION type assessments for like for like projects in similar areas these efficiencies would not apply when considering projects which are due to connect to different markets and substantially different regions of the UK. Moreover, it is our understanding from NESO, although it could be more clearly set out in the Methodology, that any project which has already received an economic assessment and meets Strategically Alignment would have their connection point protected through any future economic assessment process. As such, we do not see any strong justification to delay offshore projects to the back of the respective pathways (at least for existing projects) and instead believe this proposed approach will discriminate against the technology type in favour of onshore projects.

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Secondly, as expressed elsewhere in this response, we are aware of a potentially large number of speculative and stagnant projects contained within the Interconnector TEC register with connection dates which cannot and will not be met. In contrast we are aware of other viable projects which could connect quicker than their assigned connection date. On this basis we do not believe that maintaining the relative queue position of offshore projects is in the interests of meeting the 2030/35 pathways or GB consumers more broadly. If relative queue positions were to be maintained a large proportion of the 12.5GW and 23.7GW interconnector buckets for the respective 2030 and 2035 pathways will be filled by unviable projects. Whilst NESO have indicated that projects with regulatory regimes and those which meet the land-based criteria may be given priority through the queue formation process (although this is again not explicit within the Methodology drafting) there will remain a significant proportion of projects within the pathway buckets which are not progressing against any delivery metric, if the buckets are to be filled based on the existing queue positions. Meanwhile, there will exist interconnector projects which are not able to enter the bucket through the Gate 2 Criteria to Whole Queue process solely due to their relative queue position, behind the aforementioned unviable projects, despite being viable to connect at accelerated timescales.

If relative queue positions for offshore projects are maintained, based on the existing interconnector queue, stagnant and speculative projects will only come to be removed from the queue once their Gate 2 Deadline or Queue Management Milestones fail to be met. This process will be too slow for the proposed 2030/2035 pathway targets to be realistically achieved or to maintain the viability of interconnector projects which are stuck behind “zombie” projects. We would therefore strongly encourage NESO to remove the proposal to maintain existing queue positions for offshore projects. In particular, interconnector projects which can demonstrate that they are progressing towards delivery within a particular pathway, such as timely regulatory approvals, clear pathways for regulatory approval in the connecting country and land acquisition, should be advanced ahead of projects which are not presenting any signs of progress or are prevented from progressing due to barriers outside of the connection process. As a result, these “zombie” projects will be at least be pushed behind the viable projects, if not removed from the queue if not removed entirely.

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

Getlink supports the proposed approach to managing advancement requests as we believe it will ensure that advancement requests are only submitted by projects which can take advantage of such a request, which should in turn limit these requests to only those which are meaningful.

More broadly we have received indication from NESO that advancement requests would also be feasible informally for projects which are eligible for a capacity reservation i.e. offshore projects that do not currently meet the land criteria but could deliver pre-2035 and as such are potentially viable for the Strategic Alignment criteria. We would welcome clarity from NESO on this point, a formal mechanism for such requests and explicit reference within the Methodology

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drafting. Given that there currently exist both a number of interconnector projects in the connection queue with connection dates which realistically cannot be met and interconnector projects with connection dates which are several years beyond their viable and requested connection date, we believe that formally opening up advancement requests to projects eligible for capacity reservation will be critical tool to ensuring that the revised interconnector queue includes all viable projects.

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

Getlink strongly supports the reservation of Connection Points and Capacity at Gate 1 for projects which could not otherwise reasonably be expected to reach Gate 2 Readiness. This includes all interconnector and OHA projects given that the Connection Point is the primary determinant of an interconnector's onshore location and the circularity which would occur if the Connection Point was not fixed at Gate 1.

The CP30/35 pathways and the introduction of Strategic Alignment criteria within the Gate 2 assessment should in no way counteract these reservations. We understand from NESO, although it is not explicitly stated within the drafting of the Connections Network Design Methodology, that interconnector and OHA projects which fall outside of the 2035 bucket will receive a Gate 1 agreement which no longer includes a capacity reservation. This means that any interconnector or OHA project which is delayed until after 2035 (regardless of whether they are viable pre-2035) will receive only an indicative connection date and connection point. This is in contrast with the arrangements which were drafted with support from interconnector representatives and consulted on by wider industry through the Code Working Groups. As a result, these projects are unlikely to be able to proceed towards Gate 2 readiness given that they will not have the location certainty required to fulfil the land criteria.

Moreover, the GB regulatory processes requires an interconnector to hold a Connection Agreement prior to regulatory submission via either a Cap and Floor Regime Window or an Exemption application. It is not currently clear to us whether Ofgem would deem an indicative Gate 1 Agreement as sufficient to meet this requirement, presenting regulatory blockers alongside the land challenges. Additionally, we understand that NESO are currently considering (although it is not clearly stated within the Methodology) to give reservation preference to Interconnector projects which have regulatory regimes, again creating issues of circularity if interconnectors cannot apply for regulation without a Capacity Reservation in the first instance.

We hold that the regulatory and land blockers associated with not granting capacity reservations to the interconnector projects which are pushed outside of the 2035 will likely prevent these projects from progressing sufficiently to maintain their viability to replace

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terminations within the 2035 pathway. As explained elsewhere in this response, we expect a high rate of terminations within the interconnector 2030 and 2035 pathways given the volume of speculative and stalled interconnector projects with early connection dates. As these projects slowly drop out of the queue via the Gate 2 Deadline or Queue Management Milestones, viable projects will need to take their place. However, given the regulatory and land blockers associated with an indicative Gate 1 offer, these projects may not be able to progress sufficiently to effectively take on their queue position, therefore risking the delivery of the pathway targets. Moreover, the prevalence of uncertainty until the publication of the SSEP in late 2026 may also impact the viability of these projects to contribute to this pathway. As such, it is essential that the Capacity Reservation at Gate 1 is maintained for all interconnector and OHA projects, in line with the original code modification proposals.

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

We have outlined our support for the replacement of 2030 pathway projects with 2035 pathway projects and the need to replicate these arrangements to 2035 pathway projects with beyond 2035 projects in multiple places throughout this consultation response. We strongly believe that without the ability to replace 2035 pathway projects with projects which did not achieve Strategic Alignment with this pathway (but are viable to connect pre-2035) we will fall significantly short of the 2035 pathway targets. This is a result of the large number of terminations which can be expected as stagnant and speculative projects fail to meet their Queue Management milestones despite having demonstrated the relatively low, land-based Gate 2 requirement.

This is especially true for the interconnector and OHA technology group where there exists a large volume of projects which may reach achieve capacity reservation but will ultimately fail to make progress towards their Gate 2 Deadline or Queue Management Milestones. Viable interconnector projects which are pushed outside of the 2035 must be able to utilise the queue position of these terminated projects if we are to come close to achieving the 2035 pathway target of 23.7GW of interconnection or deliver the wider consumer benefits associated with future interconnector projects.

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). In line with our response as part of the Code Modification Working Group Consultations, Getlink supports the land-based Gate 2 criteria as drafted on the

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basis that the proposed deviations to the Gate 1 process are implemented in full. Without these amendments to the Gate 1 process, whereby projects such as interconnectors and OHAs which require connection point certainty in order to fulfil the land requirement receive Capacity Reservations, the proposed criteria would create unnecessary delays and costs for these projects and would lead to barriers in the development of this technology type.

It is critical that these deviations are applied to all relevant Gate 1 projects, including those which are either due to connect post 2035 as a result of their relative queue position or falling outside of the bucket for strategic alignment. If capacity reservation and resulting connection point certainty is not provided for these projects, they may not be able to progress towards Gate 2 readiness. As a result, when the unviable interconnectors and OHAs drop out of the queue following an inability to meet Gate 2 deadlines or Queue Management milestones there will be no "ready" projects able to utilise their queue position. If instead NESO continue to provide Gate 1 reservations for all interconnector and OHA projects, as originally indicated in the prior consultations, then post 2035 projects will continue to progress and will be available to accelerate to maintain momentum and fill these earlier connection opportunities and as and when earlier projects drop out of the queue.

Please insert your answer here for b). Getlink supports the alternative readiness option for projects seeking to apply via the Development Consent Order Route.

Please insert your answer here for c). Overall Getlink broadly supports the Gate 2 Evidence Assessment as proposed. Getlink does however advocate for a more structured Gate 2 window to ensure that all projects have an opportunity to respond to the outcome of their initial checks prior to the closure of the Gate 2 window. Given that Gate 2 windows are proposed to take place only twice a year, and missing a window would therefore result in an automatic 6 month delay to a project, it is critical that projects do not miss out on an application window for non-material reasons such as an administration error within their application.

We note that NESO currently encourage developers to apply towards the beginning of a Gate 2 window in order to receive feedback from their initial checks early enough to make a change prior to the closure of the window. If NESO has concerns about the timing to complete and communicate initial checks within the window, Getlink would advocate for the introduction of more structured window. This could take the form of a clear period or deadline by which all initial checks will be concluded, with any project which submits for Gate 2 evidence past this point being clearly informed that there will not be enough time to respond to any errors spotted within the initial checks.

Please insert your answer here for d). Getlink has limited views on the Self-Declaration templates given that they have not been included in full within the methodology. We would welcome industry visibility of these templates as soon as they become available.

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?

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Getlink supports the alternative readiness option for projects seeking to apply via the Development Consent Order Route. Getlink does not foresee any other categories of projects which should have an alternative route through Gate 2 readiness criteria subject to the Gate 1 deviations being maintained for all interconnector and OHA projects, including those connecting post 2035. If the deviation to provide connection point certainty at Gate 1 is not maintained for all interconnector and OHA projects, an alternative route through Gate 2 must be provided, as these projects cannot be reasonably expected to meet the land criteria without connection point certainty given that it is the primary determinate of land requirements for these projects.

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?

Overall, Getlink holds that the proposed project categories applicable for designation by NESO make sense. However, we do believe that the project benefits are too constrained in their focus on system operability. Given that the ultimate intention in aligning the Connections Reform to the CP30/35 and the SSEP is to deliver the government's net zero ambitions whilst protecting consumer interests we believe there would be advantages to including project designation categories which capture projects that deliver enhanced benefits to consumers or decarbonisation targets. In providing a designation route for these projects it will prevent the most beneficial projects from getting stuck behind less advantageous projects and provide a faster route to delivery, enabling their benefits to be realised at greater pace.

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

Whilst Getlink believe that the criteria proposed by NESO for designating projects seems reasonable, we would support caution in the use of "material risk" and "material improvements" given the potential for perceived subjectivity. Instead, we would encourage NESO to develop more defined metrics and baselines for what amounts to "material" against each of these criteria, whilst maintaining that in exceptional circumstances designations may need to be made outside of these criteria.

In line with our response to Question 15, and our recommendation to include designation categories regarding projects which provide exceptionally large consumer and decarbonisation benefits, we also recommend that defined metrics are introduced into the demonstration criteria for these additional categories.

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

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Getlink believes that NESO's approach to assessing designation requests makes sense, however we hold that the process for applying and consulting on project designations could be improved. Firstly, whilst the methodology sets out the information that a project developer should include within an application there is no detail on how this application can be made, for example whether it is to be submitted via email, via a portal or an alternative. Clarity on this process would be welcomed as soon as possible given the implementation timelines. It is also assumed that if a designation recommendation is made by government, DNO or an alternative stakeholder this recommendation would not be required to contain the same information as a project developer application, but again this is not clarified within the Methodology.

Turning to the review process, we note that NESO propose to include a 28-day consultation window on any project designation decisions. Getlink strongly welcomes this opportunity for consultation and believes that industry involvement will be critical to ensuring that there is no opportunity for disputes on the grounds of perceived subjectivity. However, given that NESO appear to propose that a designation request can be submitted at any time, with no linking to the Gate 1/ Gate 2 process, there is a risk that meaningful industry consultation may not be possible as designation decisions are consulted on at unpredictable and potentially numerous occasions throughout a year. Getlink would therefore advise NESO to consider the benefits of a windowed approach at least for the vast majority of designation applications.

We also have concerns relating to the feasibility of running an accelerated designation process in advance of the Gate 2 to Whole Queue process and the impact of this acceleration on both the quality of the designation decisions and the Gate 2 to Whole Queue process itself. Given the lasting impacts of these decisions we do not foresee the benefits of such an acceleration and instead believe a delay to the Gate 2 to Whole Queue process to allow the Designation process to run in full would be preferable.

Additional Questions

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

Throughout this response we have shared Getlink's support for the proposals as a whole. However, we have expressed our concerns that some specific areas of the methodologies will seek to limit the industry's ability to deliver against the proposed 2030 and 2035 pathways. These areas include the proposed approach to "ready" projects which fall outside the 2035 pathway, the approach to replacing projects which are terminated within the 2035 pathway and the proposed speed of implementation.

We also have specific concerns regarding the impact of the proposed methodologies on interconnector projects due to our awareness of the potential prevalence of stagnant and unviable projects within the interconnector TEC register. As a result we encourage NESO to

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reconsider a number of the proposed arrangements and in their place support the reintroduction of Gate 1 connection point reservations for all interconnector and OHA projects (including those falling outside of the 2035 pathway), the removal of maintained original relative queue positions (instead reviewing wider metrics for project progression including timely regulatory approvals, clear pathways for regulatory approval in the connecting country and land acquisition) and the opening of advancement requests for projects which could be viable for capacity reservation. We would welcome a further discussion with NESO on any of these areas should it be useful to ensuring that the desired outcome of the CP30 alignment is achieved.

More generally we would like to take the opportunity to comment on the accessibility of this consultation. Due to the volume of information contained within the Methodologies and supporting documents alongside the number of parallel consultations and the very short response timescales we question the effectiveness of this approach to industry consultation. Whilst Getlink recognises the intention to implement the Connection Reform at pace, we believe that this method of consultation risks meaningful industry contribution and the success of the reform. This is especially the case when consulting on arrangements which impact project developers, which often have limited resources dedicated to such market reforms.