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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 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
Is this response confidential?	<input type="checkbox"/> Yes – I do not wish for this response to be shared publicly; however I understand it will be shared with Ofgem <input checked="" type="checkbox"/> No – I am happy for my response to be available publicly

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Section 1 – Policy

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

1. Do you agree with our intention to align the connections process to Government's Clean Power 2030 Action Plan?

You can find the relevant information in **Section 2 – Context**

Yes, in principle we agree with the intention to align the connections process with Clean Power 2030. The connections queue has grown substantially resulting in significant delay in connection dates. The queue needs to be rationalised to prioritise projects that are ready to connect and are needed.

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, in principle we agree with the proposal with some recommendations. We propose that projects that are 'Ready to Build' i.e. that have already received planning consent should be prioritised first. ~100GW of additional renewable projects are to be connected in next 6 years as per Clean Power 2030, which is a mammoth task. The priority should be to connect projects as fast as possible.

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**

Yes, we think that all 'ready' projects should be included in the reformed connections queue though we think that the definition of 'ready' queue projects needs to be refined based on the status of the projects. The projects that are consented should be prioritised to connect. 'Ready' projects that have not received planning consent should be assigned connection dates based on alignment with Clean Power 2030 as this would also ensure alignment with SSEP.

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**

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Yes, we need a minimum 10 year horizon to ensure that the reformed connections queue takes into account all 'ready' projects and also to future proof the network design.

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**

The NESO preferred option does not take into account the projects that are currently ready to connect. The objective is not just to ensure alignment to CP30 plan but also to ensure these projects connect on time, So the first step should be to allocate connection dates to projects that are ready to connect (have planning consent). If the total of these projects exceeds the 2030 capacity allocation for that technology for that zone they should still be allowed to connect if they do not adversely effect the system. Only if these projects have an adverse effect on the system then they should be moved to the 2031-2035 connection dates bucket.

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**

Yes, but suggest a modification in the queue position allocation should be as per step 6 in CNDM. Also suggest that projects with the connection dates up to 2028 should be shielded if these projects are under construction or have achieved FID as per Milestone 7.

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**

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N/A

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**

No, we do not agree with the approach. We think rate of 20–30% should be applied to project attrition for the 2025–2030 bucket. For 2031–35 bucket, agree with no replacement till SSEP 1. Not all projects that receive connection offers will be built, so it is essential to build attrition in the 2030 capacity allocation as it would be difficult to replace projects from 2031–2035 bucket as they might not be ready in time.

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?

We have ~100GW of additional renewable projects to be connected in next 6 years as per CP 2030, a mammoth task. Priority should be to connect projects that are already consented. The solution for queue ordering presented by ESO looks elegant but in reality, there will be gaps. There is a possibility that a consented project may have to wait couple of years before fate of other projects (planning submitted or land rights) ahead of it is known.

The queue order should remain based on planning status in Step 6 rather than reordering queue based on acceptance date in step 7.

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It will be a huge disservice to the developer community and a significant dent in the investor confidence if the projects that are consented and ready to connect are made to wait for 2-3 years because a project that only has land rights is in the queue before them.

You cannot achieve FID for a project that has firm connection date but no planning consent or has planning consent but no firm connection date. The process needs to be modified to allocate firm POC and connection dates to projects that have achieved planning consent, so that these projects can progress to FID and subsequently construction as soon as possible.

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

Yes, the projects should be allowed to connect early if they are ready.

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

Yes, and there should be full transparency in how and when there is reservation of any Connection Point or Capacity.

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

Yes, but again queue should be based on the planning status of the project date not the date of connection offer acceptance.

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Gate 2 Criteria Methodology

You can find the relevant information in the **Gate 2 Criteria Methodology – Detailed Document**

<p>13. Do you agree with the following elements of this Gate 2 Criteria Methodology?</p> <ul style="list-style-type: none"> 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)
<i>Please insert your answer here for a). Yes</i>
<i>Please insert your answer here for b). Yes</i>
<i>Please insert your answer here for c). Yes</i>
<i>Please insert your answer here for d). Should also have specific row for capturing the planning status of the project.</i>

<p>14. Do you agree that the alternative route of meeting the Gate 2 Readiness Criteria should be only limited to projects that seek planning consent through the Development Consent Order route?</p>
Yes

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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,

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, and we expect the process of project designation to be transparent.

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Additional Questions

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

There are two main aspects that we think need to be addresses through the methodologies:

- 1. Projects that need to be shielded should be with connection dates up to 2028 instead of 2026 with the condition that they should be under construction or have achieved financial closure (Milestone 7) at the time of submission of application for Gate 2.*
- 2. 'Ready to Build' projects (with planning consent) should be prioritised. In the CNDM, the connection queue should be ordered based on the planning status as in step 6. Reordering the queue again in Step 7 would be counter productive as 'Ready to Build' projects would have to wait behind projects that only have land rights.*