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Connections Reform

Consultation Response Proforma

Your feedback is important to this process. Please take this opportunity to provide any feedback that you may have. To aid your response, each question is linked back to the relevant document for ease of reference.

Please provide your feedback using this Proforma and sending an electronic copy to box.connectionsreform@nationalenergyso.com by **5pm** on the closing date of **2nd December 2024**.

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

Respondent Details	
Name	Peter Roebuck
Organisation	Rousay, Egilsay & Wyre Islands Renewable Energy Development Ltd
Email Address	Peter@rewdt.org
Phone Number	07488284019
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

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	<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
N/A

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
N/A

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
N/A

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
N/A

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Implementation Questions

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

5. Do NESO's preferred options against each of the variables discussed in the Overview Document best deliver efficient alignment to Government CP30 Plan?
You can find the relevant information in Section 5 – Our overall preferred connections reform design and Section 7 – Further variables and options to align connections reform with strategic energy planning
N/A
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
N/A
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
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
N/A

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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?

N/A

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

N/A

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

N/A

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

N/A

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)

I strongly disagree with using the Energy Density Table as defined under CMP427 to determine the minimum acreage requirements. The Energy Density Table as defined under CMP427 is not appropriate for generators of less than 50MW.

A project that comprises a single onshore wind turbine requires sufficient land for an access track, a laydown area, turbine base and associated hard standing, and substation. A single 2.5MW onshore wind turbine which is being constructed required only 13 acres of land. Using the Energy Density Table would have required 19.23 acres of land to have been secured which is unnecessarily onerous.

The practical land requirement for a single 6MW wind turbine is nowhere near the minimum acreage requirement as set out in The Energy Density Table as defined under CMP427 (6MW x 7.6929 acres per MW for onshore wind = 46.16 acres). The proposed Gate 2 Criteria Methodology for land would effectively remove the ability for single onshore wind turbine projects to be considered for a connection prior to 2035. We know of a 6MW project that is in the existing queue, has planning permission and meets all of the Gate 2 Readiness Criteria except the minimum acreage requirement. By using the Energy Density Table as defined under CMP427 in the assessment of embedded generators less than 50MW, the methodology will remove a ready to connect project from being able to connect before 2035 which goes against the principle of the connection reform.

Given the gross incompatibility of your proposal with the needs of small generators, the Gate 2 Readiness Criteria of minimum acreage requirement should be removed from embedded generators of less than 50MW. This would be logical and align with the rest of the UK as 50MW is the threshold of small, embedded generators in England and Wales.

To summarise, the technical land requirement for an electrical generating project is unaffected by the country or district in which it is located. On this basis, the criteria should be changed to that of the generating power capacity (50MW), rather than aligning with the varying existing definitions of small, embedded generator across North of Scotland, South of Scotland, England and Wales.

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N/A
N/A
N/A

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?
N/A

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?
N/A

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

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

Additional Questions

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