

Impacts of changing the threshold risks

There is a risk of <5MW projects, that are either accepted to connect or not even contracted acceptances in the Distribution queues yet, gaining an advantage over projects >5MW.

As a result, this could cause an influx of <5MW applications to the DNOs and may use up fault level headroom of >5MW projects that enter the queue at the same time but would have to go through the TIA process.

Scenario 1: 1x <5MW & 1x >5MW project – both accepted to connect

Example A:

- Accepted to Connect 10MW generator.
- Accepted - July 2022.
- Current energisation date of 2033 (due to Transmission constraints, Distribution works 18 months from kick off design).
- Can meet Gate 2 evidence requirements.
- Accepted a Technical Limits Variation in 2024 to connect early in 2031.

Example B:

- Accepted to connect 4MW generator.
- Accepted - July 2023.
- Already been through TIA.
- Current energisation date of 2038 (due to Transmission constraints, Distribution works 18 months from kick off design).

Outcome:

- **Example A is unable to energise yet** as they don't meet the criteria to be within the CP30 bucket.
- **Example B can progress** as it would lose it's dependencies for T works to be completed.
- **To discuss** – once Example A can connect, how would Example B's connection impact on the Technical Limit & therefore, Example A's curtailment? Could there be a compromise here that Example B is only exempt from TIA process if it accepts enduring non-firm Transmission access?

Scenario 2: 1x <5MW project yet to apply for a Connection Offer & 1x >5MW project accepted to connect

Example A:

- Accepted to Connect 20MW generator.
- Accepted - July 2022.
- Current energisation date of 2035 (due to Transmission constraints, Distribution works 18 months from kick off design).
- Triggers 33kV Distribution reinforcement.
- Can meet Gate 2 evidence requirements.

Example B:

- x1 4.5MW generator – new unconnected site, applies for a DNO Offer in June 2025.
- Distribution works connection date – June 2027.
- Transmission works/delays – would not apply as not required to go through TIA process, only has Distribution dependencies & works.
- Is Second Comer to & dependent on the 33kV Distribution reinforcements triggered by Example A.

Outcome:

- **Example A remains unable to energise yet** as they don't meet the criteria to be within the CP30 bucket.
- **Example B can progress** Distribution connection works once they have obtained the required consents, many years prior to Example B. However, Example A has triggered dependent D works which Example B is Second Comer to.
 - **To discuss** –Would Example B have to wait until the Example A has progressed the 33kV Distribution reinforcement?

Scenario 3: 2x projects that have yet to apply for a Connection Offer

Example A:

- 1x 15MW generator – applies for a DNO Offer in Feb 2025.
- Can meet Gate 2 evidence requirements in 1st 2026 Gate window.
- Connection date not known yet as not been through Gate process, likely to be several years away due to Transmission constraints.

Example B:

- 1x 4.94MW generator – applies for a DNO Offer in March 2025.
- Distribution connection date March 2027.

Outcome:

- **Example A must wait** until the first Gate 2 window opens in 2026 (assuming it takes 6 months to get an Option in place) to find out the relevant T works & energisation date.
- **Example B can progress** Distribution works once they have obtained the required consents, many years prior to Example Y.
- **To discuss** – who would get priority over fault level headroom at the GSP in this situation?
 - Example B applied after Example A but the FL contribution of Example B would be reported to NESO (albeit in bulk with other <5MW sites) prior to Example A due to Gate windows.
 - What threshold for applying for a TIA is being applied currently, pre-CMP446, for <1MW schemes at GSPs which are Fault Level constrained / have 0 FL headroom?

Note, the assumption is that CMP435 (application of Gate 2 criteria to existing contracted background) & CMP446 are approved, meaning that Gate 2 requirements do not apply to the projects <5MW but do for projects >5MW. It is also worked under the assumption that there are no Fault Level issues at the upstream GSPs for these projects