

# Mod-app scoping exercise

Jamie Webb, NESO

# Introduction

- Last week, we launched a Mod App change scoping exercise through a Microsoft Form which is open to customers who have received a Gate 2 notification.
- We've received a number of questions and want to provide further clarity.
- This exercise is for **information gathering only** and is not a formal Modification Application process.

# Gate 2 timing & offer continuity

## Questions

**Q1** Will the release of Gate 2 be unaffected if the Mod App Scoping Exercise form is submitted? Developers will still need to execute the original Gate 2 offer upon receipt, and NESO will issue an amended Gate 2 offer after processing the Mod App information.

**Q2** Some reasons for submission of a mod app will only become clear once the Gate 2 offer has been received. If a customer receives their gate 2 offer before this potential 'early mod app window', will they be able to update their mod app requests?

**Q3** For the mod. app scoping, What happen if you don't know change you want until you receive the Gate 2 offer. can the changes be accommodated afterwards?

## Answers

**A1** Gate 2 offers will continue to be released as normal regardless of Mod App Scoping Exercise submissions; NESO will communicate any impacts and next steps after information gathering. Developers should execute the original Gate 2 offer upon receipt.

**A2** If reasons for a mod app only become clear after receiving the Gate 2 offer, NESO suggests reaching out directly to discuss; generally, mod app requests should be known based on current guidance, but NESO is open to clarifying and capturing additional needs.

**A3** If you do not know the change needed until you receive the Gate 2 offer, you can submit a mod app afterwards through the usual process.

# Gate 2 uncertainty & stages

## Questions

**Q1** With NESO's recent "Mod App change scoping exercise" for transmission customers, what consideration is given to customers with Transitional offers who have uncertain dates and point of connection until a full Gate 2 offer is received? Considering changes is therefore difficult in these circumstances

**Q2** Can you clarify how the outcomes of this exercise will be applied across projects at different stages of the Gate 2 process? For example, will projects that have already received or accepted their Gate 2 offers have the same opportunity to benefit as those still awaiting offers?

## Answers

**A1** It is open to those with transitional offers due to receive a Gate 2 offer. If you do not know the change needed until you receive the Gate 2 offer, you can submit a mod app afterwards through the usual process.

**A2** We will communicate clearly how decisions from the mod app change scoping exercise will apply to projects at different Gate 2 stages; offers will continue as normal, and guidance will clarify impacts for those who have received, signed, or are awaiting offers.

# Design changes, detail & technology

## Questions

**Q1** Will NESO's Mod App change scoping exercise allow requested changes to be considered as part of the Gate 2 offer design formation?

**Q2** The questionnaire only asks for what you want to change, but not by what extent. How will you be able to assess the scale of change needed without knowing if projects are looking for huge changes or minor changes (e.g. on dates or TEC)

**Q3** Is part of the intent of this exercise to assess how many applicants are considering a change in technology, for example, adding an element of demand, such as Solar + BESS, into Solar + BESS + DC as new tech? If so, would they retain their queue position? And could this be done outside the windows?

## Answers

**A1** The Mod App change scoping exercise is for information gathering to assess if changes should be allowed before contract signing; requested changes may be considered as part of Gate 2 offer design, but the same guidance applies as for post-signature changes.

**A2** The questionnaire focuses on what you want to change, not the extent; we will follow up with respondents to clarify details if needed.

**A3** The exercise aims to understand the types and scale of changes applicants are considering, including technology changes like adding demand elements; queue position retention and whether this can be done outside windows depend on whether the change is gated or non-gated, as per NESO guidance.

# Technical & capacity changes

## Questions

**Q1** Could you clarify if a Modification Application (Mod-App) is required for a change in installed capacity if the TEC or MEC remains unchanged? If an application is necessary, does it follow the gated or non-gated process?

**Q2** According to the latest gated mod app application guidance by NESO, it seems that increasing the Installed Capacity would require a Gated Mod app. However, if the increase is only by a relative small number of inverters, have you considered an accelerated approach, given the negligible impact?

## Answers

**A1** Under the current guidance, increasing installed capacity is considered a gated modification.

**A3** Under the current guidance, any increase in installed capacity is treated as a gated modification. Potential exceptions are being considered, but current guidance remains in place.

# Fixing errors & TEC reduction costs

## Questions

**Q1** If there are errors in our consag appendices and the technical Appendix F's. Can these be raised as Non-Gated "administrative contract changes" under the "Mod App change scoping exercise"

**Q2** To assist with our consideration of changes can NESO please advise how cancellation charges will be addressed for any reduction in TEC.

## Answers

**A1** Errors are not considered mod apps; they should be raised immediately and resolved through the re-offer process, not via the Mod App change scoping exercise.

**A2** The cancellation charge for a TEC reduction will be based on the attributable works and wider works. For attributable works if there are works that are aborted that result directly from the TEC reduction, there may be an abortive cost for those works, which will be identified in the offer. For wider works the charge will be calculated based on the reduced TEC, zonal rate and the percentage that has been paid at the time of the reduction (this will only apply post trigger). Both elements attributable and wider if applicable will be combined to form the cancellation charge.

# Form & terminology

## Questions

**Q1** Does the 'Application ID' referred to in the Modification Application change scoping exercise form refer to the G2 Application Portal submission number?

**Q2** What does the "reservation" wording mean within the mod app scoping exercise form?

## Answers

**A1** The Application ID refers to the G2 Application Portal submission number.

**A2** "Reservation" refers to the process of securing a connection point and capacity as part of the Gate 2 application window.

# Multiple projects & one change per form

## Questions

**Q1** For example, if I have 5 projects that I wish to change the connection date I submit all 5 on one form, correct? What if they all have different reasons, I tick all that apply? What if the dates I need the changes made by differ, do I just put the earliest date or do I submit 5 separate forms

**Q2** Note that your RFI for contract changes only allows one variable to be changed in the form, it is possible that a user may ask for multiple changes. If that information is useful for you, you may want to update the form

**Q3** We note the MS webform only allows one option to be picked for "Which non-gated/gated change do you want to request?". Is it possible for this to be a multi-selection option like the other questions?

## Answers

**A1** You can submit all five projects on one form if they require the same change; if reasons or dates differ, submit separate forms or list the earliest date. NESO is willing to assist if projects are complex.

**A2** We ask that you submit one form per change and if multiple projects require the same change, they can be included on the same form

**A3** We would advise that if you need submit both, please submit two forms.

# Form location & template access

## Questions

**Q1** Is there mod app change scoping form within the connection portal

**Q2** When gathering information via MS forms, can you also please publish a blank template (excel, word, pdf) we can use to consult internally within our organizations

## Answers

**A1** The form isn't available via the portal, only available via Microsoft Forms

**A2** The list of questions are available on the webinar slides. If you require another format, please let the team know and we will provide this for you.

# Existing Mod Apps

## Questions

**Q1** If a mod app has previously been submitted to request a different POC or connection date, providing there is no change since the last Mod App, does this have to be captured again through this 'Mod App change scoping exercise' or will the previous Mod Apps still be taken into account?

**Q2** If we have a Mod-App in progress as part of a Connection Reform advancement request, do we still need to fill in a form as part of this initiative, if there are no other scope changes other than the Connection Date advancement?

**Q3** What happens if you don't submit this information, but later want to mod-app?

## Answers

**A1** If a mod app has already been submitted and there is no change since then, it does not need to be captured again in the Mod App change scoping exercise; previous mod apps will be taken into account.

**A2** If a Mod-App is already in progress for connection date advancement and there are no other scope changes, you do not need to fill in the form for this initiative.

**A3** If you do not submit information now, you can still submit a mod app later, but it will be processed through the usual Mod App process, not as part of this exercise.

# Information gathering & Mod App types

## Questions

**Q1** I think you have to make clear that a response to the Mod App change scoping exercise is essentially a formal request to change aspect(s) of connection agreement, the term scoping exercise implies it is for information only.

**Q2** What is the definition of a 'gated window mod app' and a 'normal mod app'?

**Q3** Should changes submitted via the scoping exercise also be submitted as a ModApp?

## Answers

**A1** Submitting the form is not a formal modification application; it is for information gathering only and does not guarantee changes will be processed.

**A2** A 'gated window mod app' refers to changes processed during a specific application window tied to the connections reform process; a 'normal mod app' is a standard modification application submitted outside of this window, following usual procedures.

**A3** Changes submitted via the scoping exercise do not constitute a formal ModApp; you do not need to submit both. We will clarify next steps after information gathering.

# Transmission, BEGA/BELLA eligibility

## Questions

**Q1** With NESO's recent "Mod App change scoping exercise" for transmission customers, are we expecting a similar process for distribution customers where changes are being considered? Changes have been notified to the DNO but haven't received any reply. Is confirmation required before the Gate 2 offer?

**Q2** With NESO's recent "Mod App change scoping exercise" for Transmission customers, can you clarify if distribution customers with BEGAs can also submit requests to scope changes to the BEGA and are Large generators to be treated the same as Small and Medium?

**Q3** If we have a BEGA or BELLA with NESO, can we submit via the Mod App change scoping exercise?

## Answers

**A1** The Mod App change scoping exercise currently applies only to transmission customers; distribution customers are not in scope. If you have a transmission agreement with NESO, you are included; otherwise, for solely DNO projects, confirmation is not required before Gate 2 offer.

**A2** Only transmission customers are in scope for the Mod App change scoping exercise. Distribution customers with BEGAs are not included unless they have a transmission agreement; large embedded generators are included, small and medium are not.

**A3** Only transmission customers are in scope; large embedded generators (with BEGA or BELLA) can submit if they have a transmission agreement, small and medium embedded generators cannot.

# Gate 1 & project eligibility

## Questions

**Q1** Please can NESO confirm whether the Modapp scoping exercise is limited to Projects that were involved with connections reform (i.e. went through the G2TWQ process), or is this also applicable to existing projects that would like to make material changes?

**Q2** The Mod App change scoping exercise is for transmission customers "who have received a Gate 2 notification". Does this include customers who received a Gate 1 outcome from this notification? The option to request a 'Gate 1 without reservation to Gate 2' mod app in the form suggests this is the case.

## Answers

**A1** This exercise is for projects that going through G2TWQ. Existing projects will have to go through the usual gated and non-gated mod app process. Any decision that will be made will be considered across the whole spectrum of connections.

**A2** This exercise does not apply to Gate 1 customers as customers can submit modifications once they have signed their Agreements to Variance (ATVs) and all mods are considered non-gated.

# Connected projects and eligibility

## Questions

**Q1** With NESO's recent "Mod App change scoping exercise" for Transmission customers, can you confirm that DNOs and Transmission connected IDNOs can raise such requests, either on their own behalf, or as a result of requests from their embedded customers?

**Q2** Could you explain why connected projects are not being included in mod app scoping exercise given they may need to raise similar Mod Apps?

**Q3** The framing states only projects receiving Gate 2 notifications would be eligible to submit through the exercise, and the form has a field for "Application (APPxxx) ID" but not "Project (PROxxx) ID" . Why have operational sites that are currently unable/waiting to submit Gated Mod Apps excluded, and would you consider bringing them into the process

## Answers

**A1** DNOs and transmission connected IDNOs are not currently in scope for the Mod App change scoping exercise; only transmission customers can submit requests.

**A2** The focus of this exercise is to understand the scale of potential changes to Gate 2 offers and the risk that some offers may no longer reflect customers' project requirements. Customers who are already connected should continue to use the existing Mod App process.

**A3** If you're already connected, you should continue to use the existing Mod App process. Any potential future changes arising from this exercise would be subject to further consideration and governance and are not guaranteed. We would also consider how any approach could apply across both connected and non-connected G2TWQ customers.

# CMP471, governance & fair treatment

## Questions

**Q1** How does the Mod App CFI fit with CMP471, how will they fit together from a process perspective?

**Q2** I'm interested how can it be "for information only" and also a "one time exercise" which could also result in changes being progressed? Is something outside of the Mod App process compliant with CUSC? And has risk of anticompetitive/discriminatory outcomes been considered?

**Q3** Does the proposed approach on the ModApp scoping exercise not suggest identical projects could be treated differently depending on whether they participate in this process or not? That doesn't seem robust. Surely any additional / alternative change process must be available to all?

## Answers

**A1** The Mod App change scoping exercise is intended to dovetail with CMP471, with information gathered informing the modification and impact assessment.

**A2** We're gathering information to understand whether Gate 2 offers continue to reflect customers' project requirements and assessing the risk against resource ability being diverted to achieve the offers timeline. No decisions have been made at this stage, and any future changes would be subject to the appropriate governance and legal processes.

**A3** This exercise does not replace the existing gated and non-gated Mod App processes. It is designed to help us understand where customers' project requirements may have changed and a future Gate 2 offer may no longer reflect those requirements.

# Key takeaways

1. This Mod App scoping exercise is **an information-gathering exercise**, not a formal Modification Application process and is aimed at customers with Gate 2 notifications and open offers.
2. The existing Mod App process and re-offer processes remain unchanged and should continue to be used where appropriate.
3. Early visibility of potential changes helps us understand customer needs, with any decisions made will go through the appropriate governance process.