GB Connections reform – Consultation Response

Paul Munday – Grid Connection Manager

1. Do you generally agree with our overall initial positions on each of the foundational design options and key variations? Are there any foundational design options or key variations that we should have also considered?

   Yes, generally agree to all positions

2. Do you agree with our initial view that the current issues with the connections process could potentially be addressed on an enduring basis through other, less radical, and lower risk means than the introduction of capacity auctions?

   While we would not rule out an auction mechanism we agree the current can be resolved with lower risk. radical options

3. Do you agree with our initial view that the reformed connections process should facilitate and enable efficient connection under either a market-based (i.e. locational signals) or 'centralised' deployment approach (or an approach somewhere between the two), but not mandate which approach to follow?

   Yes we agree

4. Do you agree with our initial recommendation that TMA A to TMA C should all be progressed, irrespective of the preferred TMO?.

   Yes

5. Do you agree with our initial recommendation on the introduction of a nominal Pre Application Stage fee, discounted from the application fee for customers which go on to submit an application within a reasonable time period?

   Yes as long as fee is set to the right level i.e. not overly expensive

6. Do you agree with the importance of the TMA A 'Key Data'? Please provide suggestions for any other key data that you suggest we consider publishing at Pre Application Stage.

   We agree and would also like data on physical space/constraints at supply points

7. Do you agree with our initial recommendation with regard to TMA D (requirements to apply)?

   Yes

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8. Do you agree with our initial recommendation with regard to TMA E (determination of enabling works), including that it is right to wait until the impact of the 5 Point Plan is known before forming a view on whether further changes to TMA E are required?

   Yes

9. Do you agree with our initial recommendation with regard to TMA F (criteria for accelerating 'priority' projects)?

   Yes

10. Do you agree with our initial recommendation with regard to TMA G (queue management)?

    No, we feel a PQM process should be considered with a condition of no detriment to others – as per ENA plan (i.e. where headroom exists and projects ahead in queue cannot connect until enabling works complete, such as offshore wind/Nuclear). There should also be consideration for moving projects down/up a queue as an alternative to termination.

11. Do you agree these four TMOs present a reasonable range of options to consider for a reformed connections process?

    Yes

12. Do you think any of the four TMOs could be materially improved e.g. by adding, removing or changing a specific aspect of the TMO? If so, what and why?

    Could improve TMO2 or a add new TMO to add a window to Gate 1 application for a indicative offer

13. Are there any important TMOs we have missed?

    No

14. Do you think 'Submit Consent' is too early for Gate 2 in TMO2 to TMO4? If so, what milestone should be used instead and why?

    Yes, we believe this should be consent granted as submitting consent can be done without much information or commitment.

15. Do you agree that TMO4 should be the preferred TMO?

    Yes

16. Do you agree with our design criteria assessment of the four TMOs? If not, what would you change any why?

    Mostly agree. Design Criteria Ref 8 – no not agree TMO3 should score higher than TMO2 as unsure if benefit of batch assessment will exceed the delay caused by waiting for the Gate 2 window to open?

17. What are your views on the stated benefits and key challenges in relation to TMO4?

    Mostly agree, have some concern that ability to enable projects that are ready to connect is dependent on successful termination of stalled projects – which is why pro-active queue management should also be included as NGESO can use discretion to allow connections where termination/withdrawal etc is likely.

18. Do you think that there is a better TMO than TMO4? Whether that be TMO1 to TMO3, as presented, a materially different option, or a refined version of one of the four TMOs we have presented?

    TMO3 and TMO4 equally good – TMO3 benefit of reduced wasted work could be more significant than most other benefits if resource continues to be an issue for NGESO – especially if full offers only produce after planning consented

19. Do you agree with our views on DNO Demand in respect of the TMOs?

    Not sure – fear there could be an unintended consequence of Distribution connected demand projects being delayed due to burden on DNO to manage NGESO milestones, also concerned about a difference in process for embedded export and embedded import – should DNOs not get RDC for import

20. Do you have any views on the appropriate mechanism to incentivise accurate forecasting of requirements and avoid more RDC than is necessary being requested by DNOs?

    I do not feel that DNOs should be expected to accurately forecast RDC required, they should request an RDC they feel is appropriate for use until the next application window and any unused RDC is lost i.e. the use It or lose it approach – DNO/NGESO/TO should be able to agree on what is 'appropriate' RDC with DNO given more up front advice on available transmission capacity, i.e. a more collaborative approach than offered to connection customers

21. Do you agree with our views on the process under which DNOs apply to the ESO on behalf of relevant small and medium EG which impacts on or uses the transmission system, including that (under TMO4):
    a. i. DNOs should be able to request RDC via application windows to allow them to continue to make offers to EG inter-window; and

       Yes

    b. ii. resulting offers should be for firm access until relevant EG has reached Gate 2 (at which point they can request advancement and an earlier non-firm connection date)?

       Yes

22. Do you agree that directly connected demand should be included within TMO4 and that the benefits and challenges are broadly similar as for directly connected generation?

    Yes

23. Do you agree that TMO1 to TMO3 would require a separate offshore process, and that this would result in material disbenefits?

    Not sure – could consider use of the same process but with a different Gate 2 requirement i.e. land option secured instead of consent submitted

24. Do you agree that TMO4 is the most aligned to the direction of travel for offshore projects? If not, why?

    No comment

25. Other than the Letter of Authority differences are there any other TMAs which have specific offshore considerations?

    No comment

26. Do you agree with our views on network competition in the context of connections reform, including that TMO4 is the option which is most aligned with network competition as it includes the most design time at an early stage in the end to end process? .

    Yes agree

27. Do you agree with our initial recommendation related to each of the TMAs within this chapter? If so, why? If not, what would you change and why?

No comment

28. Do you agree with our current views in respect of the implementation period?

No comment

29. Do you agree with our current views in respect of transitional arrangements? What are your views on how and when we should transition to TMO4?

No comment

30. What further action could Government and/or Ofgem take to support connections reform and reduce connection timescales, including in areas outside of connections process reform?

Government/Ofgem should take greater measures to monitor network operators performance in providing a good service to connections customers and encourage network operators to improve their resources and invest more in training and retaining staff.

DNO/TNOs should get more support to proactively invest in network infrastructure (such as intertrip or ANM technology) especially communications infrastructure which in some cases is currently being triggered and charged to customers.