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**Derogations to facilitate earlier connection of generation – proposed interim approach**

The REA welcomes the opportunity to comment on Ofgem's proposed approach, the adoption of which should make it easier for more zero and low carbon generation to connect earlier in Scotland.

We support the proposal. We agree entirely that it would be wrong to treat parties that are able to bring forward projects in the near future, but do not yet have a suitable connection date, any differently to projects that were already connected or made an application to connect to the system in Scotland before 1<sup>st</sup> January 2005. It should be the ability to deliver the generation project that is the primary determinant of when connection takes place, rather than the date of application for a connection.

Having a cut-off date for applications for access, after which projects will be treated less favourably, just creates a vicious circle encouraging parties to apply before that deadline, irrespective of how likely a particular project is to come to fruition. This creates additional (real or perceived) demand for transmission capacity, which makes the (real or apparent) scarcity of transmission even greater, encouraging more people to apply for access.

Breaking this vicious circle will, we hope, be one of the outcomes of whatever emerges from the TAR CUSC modification process.

We hope you find these comments useful.

Yours sincerely

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Director of Policy, REA.