



Independent Networks
Association

Akshay Kaul

Email: connections@ofgem.gov.uk

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Dear Akshay

Open letter on future reform to the electricity connection process

Thank you for the opportunity to respond to your open letter. The Independent Networks Association's (INA) members include Independent Distribution Network Operators (IDNOs) who connect and adopt electricity distribution networks across GB, including new housing, EV charging facilities, commercial developments, and generation to meet the net zero challenge.

The INA fully supports the focus and prioritisation by Ofgem on improvements to the connections regime and see it as crucial to provide timely connection of local projects to the distribution networks across GB. We are supportive of the work proposed by the ESO and ENA in this area. We also welcome continued dialogue and co-ordination with Ofgem, ESO, DNOs and IDNOs as we tackle this issue from our differing perspectives. The purpose of our response is to set out our view of further improvements that can be made in both the short and longer term.

The INA welcomes the focus on all voltage levels. The targets on decarbonisation of the transmission grid cannot be prioritised over local growth projects such as the delivery of new housing, EV charging and generation connecting at the distribution level. We need to progress all projects with equal priority. This is important to deliver sustainable growth at the local, regional and country level. Whilst Ofgem plans to introduce greater alignment of energy infrastructure with local plans through regional system planning, a lack of perceived progress or prioritisation at the distribution level in the interim would be counter-productive for those communities.

In the shorter term, we need to agree a process to urgently implement practical ideas to solve the connections queue through to delivery through energy governance codes by them being treated as urgent modifications. Industry then has clarity on the rules and



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expectations for those investing in new projects. These include the changes to speed up the delivery the Electricity System Operator's statements of works (a major blocker). There are also solutions appearing to address local issues, such as congestion in West London, where solutions haven't been agreed or implemented that are impacting housing development.

The ESO proposes to improve their modelling assumptions, the INA believes that this should also be done at the distribution level. The INA believes that some projects are being constrained by modelling connections from a worst-case electricity consumption scenario. This is a common issue cited by EV charging projects. Our members data shows EV charging taking up around 30% of the contracted capacity to date so it is important that use data to inform modelling and security of supply considerations, as well as using spare capacity. New connections should be fully differentiated between the types of connections, their capabilities and their expected lifespan (i.e., EV charging compared to housing developments).

We have also been alerted to worst case consumption scenarios being used in modelling EV charging where the consumption is offset by batteries or other storage proposed in the projects. It is hoped that the proposed changes to the treatment of storage can unlock existing connections proposals that offer storage.

Harnessing flexibility is vital in this early stage to prevent the over-building of assets in the coming years. Smarter use of the grid to capture consumer-based flexibility is needed now at a regional level and cannot wait until FSO is in place as market facilitator at a regional level. Ofgem's flexibility work should identify early regulatory solutions to encourage flexibility providers to make full use of consumer-based flexibility.

Whilst Ofgem has indicated that bringing competition to all types of network investment, such as strategic and enabling investment will be considered as the FSO expands its role into local system planning, it should review whether there are benefits to fast tracking this. The competitive model has brought many benefits to energy consumers, this should be the default. Where anticipatory investment is warranted, it is important to agree a clear formula to underpin this investment.

In the longer term, the INA sees practical planning reforms are needed and we would welcome a conclusion to the review of wayleaves, easements and consents by DESNZ. This creates a significant delay to the swift deliver of new connections due to protracted



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negotiations with landowners. The adoption of a common approach to terms and conditions and the expected compensation will go a long way to remove this blocker. We also see an opportunity to create more standardisation of the DNO / IDNO network interfaces to reduce delays.

Finally, the INA would welcome support in encouraging future net zero policy implementation dates to be considered in line with the required energy infrastructure. Aligning policy with deliverable implementation dates is important to maintain progress to, and confidence in, net zero policies. The most immediate policy concern is the 2025 implementation date for the Future Homes Standard. The consultation paper has yet to emerge from Government and it is unclear what, if any, transition will be put in place.

Please don't hesitate to contact me should you need any clarification on our points or wish to discuss them further.

Yours sincerely,

Nicola Pitts
Executive Director