

Hi Ofgem,

Further to your letter dated 19th April 2024, here follows our feedback on the newly announced TMO4+ proposals from NGESO:

CAP 3.1:

We do not think that making it expensive to get a Gate 1 Offer is a fair approach. The charges levied by NGESO should represent the real costs associated with the work involved with them and the relevant TO preparing the Gate 1 Offer. Adding additional levies above this means that larger developers gain an advantage over smaller developers, and remember in Scotland even very small schemes need to go through this process, even when embedded.

However we agree that entry requirements should be stiffer and welcome Landowner Authority, we would go further and suggest that authority should be provided by all landowners associated with the land foot print required for the scale of project applying.

In terms of Gate 2 entry requirements, we would suggest that only projects with secured planning permission are allowed to apply and receive Gate 2 offers, but if this is asking too much, then the bare minimum would be that the project should have at least submitted its planning application before it can proceed to Gate 2.

CAP 3.2:

As before we do not agree with financial measures being implemented in order for a project to keep its Gate position (because this favours the larger companies).

We feel a projects ability to sit within Gate 1 (what we call the waiting room) should be time limited instead. Ideally projects would only apply for Gate 1 offers if they feel they can progress quickly enough to get through the Gate 1 waiting room and secure a Gate 2 offer. Depending what Gate 2 criteria is, it maybe necessary to have technology specific time limits, e.g. a Battery scheme can get planning consent much more quickly than a Wind Farm can. So if Gate 2 criteria means submission (rather than securing) planning permission, we think the time-limits should be something like:

Technology	Timeframe up to Planning Submission
Battery Only	1 Year
Solar	1 Year
Wind	2 Years
Hybrid (mix of any above)	2 Years

CAP 3.3:

We feel that schemes sitting at Gate 1 (in the waiting room) and what they look like should be fully visible. We also feel that NGESO should publish some kind of yearly report detailing how they plan to tackle connections required if all Gate 1 schemes were to continue.

We expect Gate 2 schemes to feature in TEC & TWR registers.

CAP 3.5:

We feel that the TEC, Embedded and TWR Registers could be improved. Every scheme with a Gate 2 Offer should be listed and easily linked to its location and the full extent of works required before it can connect as well as the works required before its able to have full grid access (e.g. some projects get early constrained access under Tech Limits etc).

We welcome NGESO's new interactive map showing the connections queue which they demoed at their Customer Seminar in Glasgow on the 23rd April.

Have a great weekend,

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