



Peter Bingham
Director Strategic Planning, Engineering and Technology
The Office of Gas and Electricity Markets
10 South Colonnade,
Canary Wharf,
London E14 4PU

7 May 2024

Dear Mr. Bingham,

Ref OFGEM Open Letter dated 19 April 2024

One Planet Developments Limited (“OPD”) is broadly supportive of OFGEM’S position as set out in your open letter of 19 April 2024.

However, the aim of the suggested reforms seems to be more focused on reducing the connection queue and not on accelerating the physical connection of existing viable projects. In particular, there needs to be a process by which the distribution network operators and transmission network operators (“**Networks**”) accelerate projects that have already secured planning permission, hold legal rights over the land, and hold an accepted a grid connection offer.

The proposals seem very transmission connection focused. OPD would like to see more on distribution connections, and in particular would like to see further reassurance that distribution network connected customers haven’t been, and will not be, affected by any DNO’s management of the interface with NGESO, for example where a DNO has not managed the Mod App process effectively or consistently to the detriment of distribution network connected customers.

CAP 3.1 - Raise entry requirements: OPD supports the move to raise entry requirements. Our concern is that the Gate 2 proposal will simply shift the bottleneck. The cost of putting in place an Option to Lease for a solar farm or battery storage site is typically £30-50k. This is not a significant sum to many developers and investors, so lots of projects will be easily able to meet the Step 2 criteria to secure a connection date and POC. OPD would like to see developers prove at Gate 2 that they have secured

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land rights that cover the time period that will be required to build out and connect the project, not just a short term Option to comply with the new Gate process.

With reference to Letters of Authority, OPD would like to see the same rules apply equally to transmission connected applications as distribution connected sites, including the need to specify a defined land area. Any subsequent changes to the site and/or point of connection/supply should be governed by the same rules as are currently applied by the DNOs.

CAP 3.5 - Improve data and processes, and sharpen obligations and Incentives: The DNOs' data in relation to customer connections is not accurate and/or consistent and therefore it is difficult for customers to make investment decisions with such poor quality data. For example, we are in receipt of information from a DNO that shows different data across their Embedded Capacity Register and the Curtailment Report issued with a Technical Limits offer (the two lists are produced and maintained separately). In this case, a 150MW solar project that appears on the Curtailment Report is not on the Embedded Capacity Register. We have heard from other developers and grid connection specialists that such inconsistencies are common. Whilst the Embedded Capacity Register data is in the public domain, the DNOs tend to hide behind a 'commercially sensitive' defence when pressed for information on what projects are ahead of us in the Curtailment Report queue. At DNO level, Curtailment Report project lists should be based on, or at least reference, the projects in the Embedded Capacity Register so developers can better understand the other projects looking to connect to the Networks.

Separately, to have transparency across all Networks OPD would like to see a single queue that shows the combined Transmission and Distribution queues which should include details of milestones set and met.

• **CAP 3.4 - Better allocate available network capacity:** There is currently no process for the Networks to accelerate a distribution connected project that is in Part 4 of the Appendix G and has secured planning permission. OPD has two solar projects (10MW and 25MW) that have secured planning permission. One cannot connect because 'earlier' projects are preventing the Networks accelerating our connection. In the other case our project has been delayed by *subsequent* applications (many of them potentially speculative) impacting the future design of a GSP.



Both projects could be constructed immediately as the existing lines and local substations have the physical capacity to receive the generation, but as it stands the grid connection dates are now 2032 and 2033 respectively. OPD would like to see a detailed process for the Networks to accelerate projects that have secured planning permission and hold land rights.

Networks are very good at meeting their statutory obligations – for example providing quotes within 65 days. OPD would like OFGEM to impose and enforce similar obligations on the Networks to accelerate grid connections.

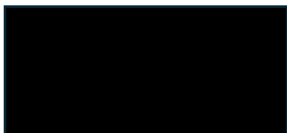
Many of our projects were commenced (i.e. grid offers accepted) in 2019/2020 and still the Networks are unable to tell us when we can connect or how curtailed we will be when we do. We have invested millions in our project pipeline and ongoing delays not only undermines that investment, it also delays the benefits of lower cost, lower carbon electricity to consumers. In the interests of fairness, OPD would like the Networks to face penalties if they don't meet the connection timescales that they have set.

The Networks constantly publish data on how much the queue has grown by and OPD acknowledges that there have been record numbers of applications. OPD would like OFGEM to require the Networks to publish data on the number and size of connections that they have actually connected, as well as how many grid offers have been accelerated and by how much, including details of the level of curtailment offered.

OPD recognises the scale and complexities of the challenges faced by the Networks and welcome OFGEM's focus and work to improve connection times.

Please do not hesitate to contact me should you or your team wish to discuss any of the above. With

kind regards



For and on behalf of

One Planet Developments Limited

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