

Open Networks Project Team
Energy Networks Association
4 More London Riverside
London

25 September 2019

To whom it may concern,

Application Interactivity & Connection Queue Management: Consultation Response

Scottish Renewables is the voice of Scotland's renewable energy industry, working to grow the sector and sustain its position at the forefront of the global clean energy transition. We represent around 260 organisations across the full range of renewable energy technologies in Scotland and around the world, ranging from energy suppliers, operators and manufacturers to small developers, installers and community groups, as well as companies throughout the supply chain.

Transitioning to a smart, flexible and low-carbon energy system will require effective application and queue management processes to ensure that projects can connect to the network quickly and more efficiently. We welcome the work undertaken by the ENA and Open Networks Project to support this.

In responding to the consultation, we would like to draw your attention to the following points:

- We broadly agree with the proposed approaches for both application interactivity and queue management processes. We are also supportive of a common approach being applied across all Transmission and Distribution Network Operators.
- Network operators must be transparent in their decision making and clearly communicate at the earliest opportunity any changes to requirements or costs as a result of changing position in the queue.
- We would welcome clear guidance on how projects which miss milestones due to reasons outwith the control of the generator will be treated.
- We would also welcome clarity on how these proposals will interact with the route to appeal decisions, transmission arrangements such as 'Connect and Manage' and the treatment of assessment and design fees as it is not clear how these will be affected.

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- While we support the principles of how flexibility should be treated within the connection queue, we would welcome further clarity on how the treatment of flexibility will work in practice.

We have answered your consultation questions where appropriate below and are happy to discuss our response further.

Yours sincerely,

A handwritten signature in cursive script that reads "CDalziel".

Cara Dalziel

Policy Manager

Scottish Renewables

Consultation Questions

- 1. Do you agree with the ‘conditional’ interactivity solution being proposed? If not, what reasons do you have for preferring a different solution?**

We agree with the ‘conditional’ interactivity solution being proposed and that unsuccessful applications should be able to retain their place in the queue. It is important that there is clear communication with unsuccessful applicants who request a requote so that they fully understand any additional requirements and costs for reinforcements.

- 2. Do you agree with the proposal to form the connection queue based on the date that the customer accepts the connection offer? If you do not agree, please provide justification in your response.**

We agree that the connection queue should be based on the date that the customer accepts the connection offer.

- 3. Do you agree with the preferred queue management milestones, timescales and evidence requirements? Are there any projects where you don’t think milestones should be applied? Please provide justification in your response.**

We agree with the preferred queue management milestones, timescales and evidence requirements. The proposed tolerance approach around these milestones will be key to ensuring that all projects are fairly treated.

- 4. Do you agree with the preferred approach to providing ‘tolerance’? In particular, we would welcome your views on the following;**
 - I. Concept of tolerance and cumulative delay**
 - II. The timescales set out in table 1 that will be used to determine projects that are ‘at risk’**
 - III. The timescales set out in table 2 that will be used to determine if a project is subject to termination.**

We broadly agree with the proposed approach and timescales, however we have concerns around how this approach will work for projects which are delayed due to reasons outwith the control of the generator. We believe it is critical that network operators take a pragmatic approach in these circumstances and ensure that projects are not unfairly treated or terminated. We would welcome clear guidance on how these cases would be treated and what evidence a generator can provide to show that the delay is out with their control.

We would also welcome clarity on whether there will be any allowances built into the new framework which allow for certain projects to be exempt from cumulative delay.

- 5. We would welcome your views on the preferred approach to queue management rules illustrated in the examples provided. Specifically;**
- a) Do you agree with the position that where a project moves to the bottom of the queue, milestones will be updated to reflect the new connection date, whereas any cumulative delay accrued from the date of offer acceptance will be carried over?**
 - b) Do you agree with the position that a project would be required to reduce capacity if the capacity available is less than the capacity of your project?**

We feel that this is a sensible approach. We would emphasise however that discretion must be applied where appropriate, such as in cases where a project is in an uncongested area and therefore the delay will not have a significant impact on the system. This is likely to vary across network areas. Circumstances such as this should be assessed on a case-by-case basis to ensure that projects are not terminated unreasonably.

It is important that where a project is subject to queue management that the process by which this decision was made is well understood by all parties. Equally, there must be clear and consistent communication on any additional requirements or cost burdens incurred as a result of changing position in the queue. These should be communicated to generators at the earliest opportunity. We note that the consultation does not provide details on the route for generators to appeal decisions taken against their project and would welcome further clarity on this.

- 6. Do you agree with the preferred approach to the treatment of flexibility in a connection queue? Please provide justification, if you do not agree.**

We agree with the principle of how flexibility should be treated. Clarity is required on how this approach will work in practice to mitigate the risk of potential gaming, as well as greater details on the contractual arrangements for projects which are allowed to connect earlier.

Where a project is able to connect at an earlier date, it is crucial that there is clear communication with generators to ensure that they are aware of any changes to requirements or costs, such as having the opportunity to unfix their liabilities.