

Email to:

Ena.strategic.connections@energynetworks.org

23 May 2025

Dear ENA,

Response to Distribution Queue Management Changes

Scottish Renewables is the voice of Scotland's renewable energy industry. The sectors we represent deliver investment, jobs and social benefits and reduce the carbon emissions which cause climate change. Our 360-plus members work across all renewable energy technologies, in Scotland, the UK, Europe and around the world. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can help sustainably heat and power Scotland's homes and businesses.

RenewableUK members are building our future energy system, powered by clean electricity. We bring them together to deliver that future faster; a future which is better for industry, billpayers, and the environment. We support over 400 member companies to ensure increasing amounts of renewable electricity are deployed across the UK and access markets to export all over the world. Our members are business leaders, technology innovators, and expert thinkers from right across industry.

The reform of the connections queue has been fast-paced and resource-intensive, placing significant and unprecedented pressure on all stakeholders involved in the changes. Industry has consistently engaged constructively with decision-makers to help shape the process, and thus, in addition to commenting on the specific changes proposed, we feel compelled to highlight the shortcomings in the Energy Networks Association's (ENA) approach to date.

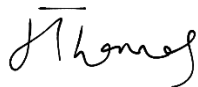
While the National Energy System Operator (NESO) has demonstrated a commitment to effectively informing industry of changes, the same cannot be said for the ENA and the nature of this call for feedback exemplifies this. The changes proposed by the ENA in their recent webinar have not been published or shared formally with stakeholders, and manually searching for the webinar slides via the ENA website is highly challenging. Combined with the lack of information dissemination, the call for feedback is both not a formal consultation and also only open for two weeks. Such a limited timeframe curbs industry from developing an informed opinion via conducting risk reviews, for example, and does not render the engagement process transparent or inclusive.

Members agree that the DNO process should align with that of TMO4+; however, the two require tailored solutions to accommodate the difference in approach. Thus, rushing the implementation process risks unintended consequences impacting the success of the overall reform. There are numerous projects on early iterations of Queue Management milestones; therefore, the implementation's timing and methodology are key and must be developed using robust evidence. Preliminary sense-checking of changes with industry is a vital step that requires sufficient time, afforded by more formal consultation, and development for meaningful consideration of the proposals.

We believe the ENA is proposing significant changes that, in some areas, due to a lack of industry engagement, have become a problematic amalgamation of transmission and distribution practices. We support the robust application of milestones to ensure non-viable projects are managed appropriately. Still, the approach needs to more carefully consider issues outside of the developer's control for projects being actively progressed.

Please see below for more detailed commentary on the ENA's proposed changes. Scottish Renewables and RenewableUK would be keen to engage further with this agenda and facilitate more collaborative working practises between industry and the ENA, and would be happy to discuss our response in more detail.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'H Thomas'.

Holly Thomas

**Grid & Systems Policy Manager
Scottish Renewables**

Peter McCrory

**Policy Manager – Networks and Charging
RenewableUK**

Implementing a timescale for achieving the M4 milestone of either 18 months or 24 months?

Industry has long called for the distribution process to appropriately mirror that of TMO4+, so we agree with this change but think 24 months is a more suitable timeframe. Despite best endeavours, it is not guaranteed that NESO will run application windows more than once a calendar year. Thus, the ability to apply for Gate 2 may be more limited than anticipated. Appropriate exemptions should also apply whereby delays arise from DNOs not issuing Variations in a timely manner, as has been the experience in the recent past with the Two Step Offer process.

We are aligning with transmission milestone guidance and proposing a shift from tolerance to remedy. Do you agree with moving to remedy instead of tolerance?

Members are not supportive of moving to remedy as it provides less time than the cumulative approach due to the removal of tolerance and the reduction from 65 working to 60 calendar days. The move from working to calendar days unnecessarily exacerbates the time reduction where a 60-day remedy approach already limits developers' ability to respond before an automatic cancellation.

The former tolerance approach is deemed more appropriate in the context of delays being commonplace and unavoidable, regardless of project viability and efforts to progress development.

We're introducing backward-facing milestones alongside forward-looking ones for customers with connection dates over 5 years to ensure fair and achievable timelines. Do you agree with this approach?

We agree with this approach and the proposed timescales.

We've aligned our changes with connection reform (TMO4+) and the Government Connection Action Plan 2030 whilst aligning with transmission. Do you think we've covered everything?

Members' primary concern is that M1 remains within two months of M4 and the level of financial risk associated with preparing a planning application before obtaining a connection date. Historically, the DNOs have not consistently policed this milestone and thus, maintaining this requirement with a shift to the transmission approach of no cumulative tolerance could elevate the risk significantly. Furthermore, this approach diverges considerably from transmission where Town & Country Planning (TCPA) and/or Development Consent Order (DCO) projects can have up to two to three years, forward-looking, to get to M1.

Similarly, the requirement to submit an Independent Connections Provider (ICP) design six months post-planning consent is highly challenging and misaligned with the reality of project development. Identifying an ICP within six months is already considered an enormous task before securing the eventual design. Such tight timescales do not reflect the practical realities developers face and, if enforced, could lead to premature expenditure and increased financial exposure.

In addition, we have concerns about the timescale and evidence requirement changes to M5 Contestable Design Works. Approving the full contestable design submission requires multiple exchanges between the developer and third parties, especially the DNO, rendering the changes problematic. Delays outside the developer's control are commonplace when relying on DNOs to action specific tasks, such as tower designs or harmonics studies. In the absence of stricter requirements on the DNOs in the current context, the developer bears the risk associated with these delays even more so. The ENA should reconsider this change in favour of alternatives that, for example, discount the time taken on the DNO processing side, or relate more to elements within the developer's control, i.e., submitting the design.

Aligning to the process for transmission is welcome; however, the context within which the original proposals were developed is worth noting. The backwards-looking milestones developed for the transmission process were achieved through a formalised working group under CMP376, and those forward-looking arose from the CMP434 process. Thus, the ENA's approach of updating existing guidance with limited stakeholder engagement is incompatible and not fit for purpose. With the revisions proposed to apply retrospectively, the need to implement this summer appears unclear and could undermine the delivery of Connections Reform and, subsequently, of projects deemed to be ready and strategically aligned.

A general point that will be key to the success of the milestones is the need to harmonise DNO approach in policing milestones to ensure consistency and confidence for project development for Clean Power by 2030 (CP30). For example, National Grid Electricity Distribution (NGED) are very proactive in monitoring milestones with a dedicated team seeking customer updates. Meanwhile, although Northern Powergrid (NPG) has recently adopted a similar approach on early milestones, they diverge from NGED in policing the M1-M4 two-month period. The ENA should seek to minimise differences across providers by modifying its guidance to prevent DNOs from independently interpreting and applying the rules to the confusion of developers.

Finally, members would benefit from the ENA outlining the comparative process timelines on milestones for projects seeking planning under the different regimes of TCPA, DCO and the Scottish planning regime at transmission and distribution. Presenting a clear visualisation across the jurisdictions to demonstrate their alignment, as NESO did for their changes, would help evidencing fairness and avoiding unintended disputes.