

## Connections Reform - Policy Consultation on Required Licence Changes Response Form

We are consulting on conditions in the Electricity System Operator, Transmission and Distribution licences in relation to the ongoing connections reform process, which aims to enable quicker connection for ready-to-connect projects that align with strategic energy system plans and provide a more coordinated and efficient network design for connections.

We would like views from stakeholders with an interest in the electricity connections process and the ongoing reforms. We particularly welcome responses from connection customers, developers and network companies. We also welcome responses from other stakeholders including members of the public.

Your feedback is important to this process. Please take this opportunity to provide any feedback that you may have. To aid your response, each question is linked back to the relevant document for ease of reference.

We encourage you to read the Connections Reform - Policy Consultation on Required Licence Changes and the subsidiary documents:

- **Annex A:** Proposed NESO Licence Modifications; and
- **Annex B:** Proposed Transmission Standard Licence Modifications before responding to the consultation questions.

This document outlines the questions for this consultation and once the consultation is closed, we will consider all responses.

Please provide your feedback using this response form and sending a copy to [connections@ofgem.gov.uk](mailto:connections@ofgem.gov.uk) by 5pm on 6th January 2025.

We encourage early submission ahead of the deadline where possible to aid the processing of responses.

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## Data and confidentiality

Contact name: Jim Cardwell

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Role title: Head of Energy Systems Policy

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Company name: Northern Powergrid

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Telephone number: 07713 332789

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Email address: [jim.cardwell@northernpowergrid.com](mailto:jim.cardwell@northernpowergrid.com)

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Date of submission: 6 January 2025

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Do you want your response treated as confidential? Please choose the option that is relevant to you.

No

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Please tell us if parts of your responses or your whole response contains confidential information and explain why below.

N/A
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## Consultation questions

### Proposed Electricity System Operator Licence Conditions

#### General approach to changes to the Electricity System Operator licence

1. Do you agree that licence changes are necessary to adequately facilitate the policy intent of the reformed Connection Process, if it is approved?

Please provide the reasons for your answer.

Yes

Major change to connections processes and need to maintain future flexibility for further changes.

2. Do you agree with the approach summarised in paragraphs 3.2 to 3.8?

Please provide the reasons for your answer.

Yes

Yes, it is in line with the changes as proposed by the NESO through its connections reform programme.

3. Do you agree that we have considered all relevant areas of the licence which might need modifications, and that we have proposed changes in relation to all relevant matters? If there are areas we need to consider further, please specify. Also, please specify any matters that we have addressed but which you do not think should be relevant.

Please provide the reasons for your answer.

Yes

We are unaware of any further areas.

## Section A: Definitions and Interpretation

### Condition A1:

4. Do you agree that the new definitions as set out in paragraphs 3.12 to 3.19 and draft legal text in condition A1, as set out in Annex A, are necessary to and adequately facilitate the policy intent of the reformed Connection Process?

Please provide the reasons for your answer and any alternative suggestions if you disagree.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

5. Do you agree that no changes are required to the existing definitions in condition A1, as set out in Annex A, and that the proposed new changes are enough?

Please provide the reasons for your answer and identify any changes you consider to be needed.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

### Condition B3: Conduct of ISOP Business

6. Do you agree this clarification in paragraph 3.21 and proposed text in condition B3, as set out in Annex A, is required?

Please provide the reasons for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

### Condition C11: Requirements of a Connect and Manage Connection

7. Do you agree with the policy intent behind the changes we are proposing that these types of "full" offers will only be made to the "non-gated" applications or "Gate 2" applications?

Please provide the reasons for your answer.

Yes

'Full' offers are inappropriate for all types of applications.

8. Do you agree that proposed text in condition C11, as set out in Annex A, gives appropriate effect to the policy intent?

Please provide the reasons for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

## Section E: Industry Codes and charging

### Condition E2: Connection and Use of System Code (CUSC)

9. Do you agree with the policy intent behind the changes we are proposing in paragraphs 3.28 and 3.29?

Please provide the reasons for your answer.

Yes

Site specific details are inappropriate for all types of applications.

10. Do you agree that proposed text in condition E2, as set out in Annex A, gives appropriate effect to the policy intent? Do you think any further changes would be appropriate?

Please provide the reasons for your answer.

Yes/ No N/A

We have not reviewed the CUSC drafting and we consider NESO is best placed to comment.

### Condition E12 (New): Connection Criteria Methodology

11. Do you agree with the proposal for the licensee to create and maintain the Connections Criteria Methodology as in paragraphs 3.30 and 3.34?

Please provide the reasons for your answer.

Yes

This content needs documenting and maintaining with the NESO best placed to do so.

12. Do you agree with the objectives and scope of the Connection Criteria Methodology as in paragraphs 3.32 and 3.33, respectively?

Please provide the reasons for your answer.

Yes

It appropriately mirrors the content of the connections reform proposals that have been submitted to Ofgem for approval.

13. Do you agree that the new condition E12, as set out in Annex A, provides the right level of governance and industry engagement to ensure that the Connections Criteria Methodology is developed and modified in a robust manner?

Please provide the reasons for your answer.

Yes

It echoes established industry principles for open governance.

### Condition E13 (New): Connection Network Design Methodology

14. Do you agree with the objectives of the Connections Network Design Methodology as in paragraph 3.38?

Please provide the reasons for your answer.

Yes

They are suitably comprehensive.

15. Do you agree with the scope of the Connections Network Design Methodology as set out in paragraph 3.35 and 3.37 is aligned with the TMO4+ connection reform process?

Please provide the reasons for your answer.

Yes

There is good alignment with the connections reform proposals.

16. We have kept the licence change broad for 'preparing offers' as in paragraph 3.37. Should we be more specific with the scope to include further description in the licence that it will determine the queue order, study applications and assess the infrastructure required to enable/prepare offers to enter into a "Gate 2" agreement?

Please provide the reasons for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

17. Do you agree that the proposed addition of conditions E13 , as per Annex A, and in this section provides the right level of governance and industry engagement to ensure that the Connections Network Design Methodology is developed and modified in a robust manner?

Please provide the reasons for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

#### **Condition E14 (New): Project Designation Methodology**

18. Do you believe the NESO should be able to designate projects for prioritisation in the circumstances as specified in paragraph 3.42?

Please provide the reasons for your answer.

Yes

Prioritisation of projects is central to the programme of connections reform and this policy sits comfortably within this framework.

19. Do you agree that the NESO should only be able to designate projects after a period of consultation as in paragraph 3.43, for existing agreements also in the first application window?

If not, please explain your reasoning, along with alternative suggestions if appropriate.

Yes

Transparency is important to build trust and guide future applications for project designation from future connectees.

20. Do you agree that the proposed additions of conditions E14, as set out in Annex A, provide the right level of governance and industry engagement to ensure that the Project Designation Methodology is developed and modified in a robust manner?

Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

### **Condition E15: Requirement to offer terms**

21. Do you agree with the requirements that an application window as in paragraph 3.56 is practical and sufficient? Please provide the reason for your answer. What is the right maximum and/or minimum period prescribed in the licence for how long the application window should be open? Is the minimum requirement of at least once every year sufficient?

Please provide the reasons for your answer.

Yes

This is in line with the Connections Reform proposals developed through code modification groups. The frequency and duration of application windows is not a major determinant of the effectiveness of the reforms.

22. Do you agree that 6 months as mentioned in paragraph 3.59 to provide an offer once the application window closes is adequate? Do you agree with our proposed option regarding timing for the NESO to make offers, or do you prefer any of the alternative options set out in paragraph 3.60? Are there any other options we should be considering? Please provide the reasons for your answer and suggest alternative.

Yes

This 'backstop' condition is fit for purpose and need not be more sophisticated.

23. Do you agree with our proposed approach of specifying which type of applications get which type of offers as in paragraphs 3.52 to 3.55? Does this cover all type of applications?

Please provide the reason for your answer and mention if any type of applications is not captured in here.

Yes

Distinguishing between gate 1 and gate 2 offers is important.

24. Do you agree that the proposed legal text in condition E14, as set out in Annex A, meets the policy intent above?

Please provide the reason for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

## Proposed Electricity Transmission Standard Licence Conditions

### General approach to modification of the Electricity Transmission Standard Licence Conditions

25. Do you agree with our approach mentioned in paragraphs 4.1 to 4.3?

Please provide the reasons for your answer.

Yes

Removing any barriers and supporting the implementation of connections reform are important objectives to be reflected in all transmission licences.

26. Do you agree that we have considered all the areas of the licence which might need modifications?

Please provide the reasons for your answer and specify if you think we have missed some areas.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

## Section D: Transmission Owner Standard Conditions

### Condition D1: Interpretation of Section D

27. Do you think any other modifications to definitions are required for the transmission licence in addition to the ones proposed for the System Operator Licence in paragraphs 3.12 to 3.19, in the consultation document?

Please provide a reason for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

28. Do you agree that the proposed text in SLC D1, as set out in Annex B, meets the policy intent?

Please provide a reason for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

29. Would you suggest any changes to the new and existing definitions in SLC D1 that are pertinent to Connections Reform?

Please provide a reason for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

**Condition D4A: Obligations in relation to offers for connection etc.  
(Transmission Owners)**

30. Do you agree with the policy intent and the rationale described in the paragraphs 4.6 to 4.10, in respect of the changes to SLC D4A.1, in the consultation document?

Please provide a reason for your answer.

No

Para 4.6 inappropriately states that 'in the case of embedded generation that impacts the Transmission network, DNOs and/or IDNOs may be responsible for making this decision and communicating it to the NESO and their customers.' We consider that all such *decisions* must be made by the NESO as these decisions relate to transmission system access. Other networks, like TOs and DNOs will bring forward recommendations but should have no decision making accountability.

We are supportive of the policy intent in paras 4.7 to 4.10.

31. Do you agree with the proposed changes to the text of SLC D4A.1, as set out in Annex B?

If you disagree or partially agree, please provide a reason for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

**D4A.2- New proposed Paragraph 2 – requirements to offer terms requirements to offer to enter into agreement with the ISOP and provisions for that offer**

32. Do you agree with the policy intent and the rationale for the proposed changes described in the paragraphs 4.11 to 4.13, in respect of the changes to SLC D4A.2, in the consultation document?

Please provide a reason for your answer.

Yes

It is in line with the Connections Reform proposals submitted by NESO to Ofgem for approval/

33. Do you agree that the proposed changes to the text of the new paragraph 2 of SLC D4A, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

**D4A.2, D4A.3, D4A.4, D4A.5- Proposed paragraphs 3, 4, 5 and 6 (formerly paragraphs 2, 3, 4 and 5)**

34. Do you agree with the policy intent described in paragraph 4.17, in respect of the changes suggested in paragraphs 2, 3, 4 and 5, now amended to become paragraph 3, 4, 5 and 6, of SLC D4A, in the consultation document?

Please provide a reason for your answer.

Yes

Distinguishing between different types of offers is appropriate.

35. Do you agree that the proposed changes to the text of the amended paragraph 3, 4, 5 and 6 of SLC D4A, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

**Condition D16: Requirements of a connect and manage connection**

36. Do you agree with the policy intent and the rationale in respect of the proposed changes to SLC D16 as described in paragraphs 4.19 to 4.23, in the consultation document?

Please provide a reason for your answer.

Yes

Changes are necessitated by the programme of connections reform.

37. Do you agree that the proposed changes to the text of SLC D16, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

**New Condition D18: Requirements to comply with connection network design methodology for Use of System and connection (Transmission Owners)**

38. Do you agree with the policy intent behind the proposed new licence condition as explained in paragraphs 4.24 to 4.26, in respect to the proposed SLC D18, in the consultation document?

Please provide a reason for your answer.

Yes

The co-operation and support for the new core processes is important.

39. Do you agree that the proposed text gives appropriate effect to the specific policy intent, as detailed in Annex B?

Please provide a reason for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

## Section E: Offshore Transmission Owner Standard Conditions

### Condition E17: Obligations in relation to offers for connection etc. (Offshore Transmission Owners)

40. Do you agree with the policy intent and rationale in respect of the changes proposed to SLC E17, in paragraphs 4.28 to 4.34, in the consultation document?

Please provide a reason for your answer.

Yes

It mirrors the changes for onshore transmission which is appropriate.

41. Do you agree that the proposed changes to the text in SLC E17, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

### New Condition E25: Requirements to comply with connection network design methodology for Use of System and connection (Offshore Transmission Owners)

42. Do you agree with the policy intent behind the proposed new licence condition as explained in paragraph 4.35, in respect of the SLC E25, in the consultation document?

Please provide a reason for your answer.

Yes

It mirrors the changes for onshore transmission which is appropriate.

43. Do you agree that the proposed text of the new condition, as detailed in Annex B, gives effect to the policy intent?

Please provide a reason for your answer.

Yes/ No N/A

We have not reviewed the licence drafting relevant to non-DNO parties who are best placed to review and comment.

## Distribution Standard Licence Conditions – Policy Intent

### Chapter 1: Interpretation and application

#### Condition 1: Definitions for the standard conditions

44. Do you agree that changes are likely be required to some of the definitions within licence condition 1?

Please provide the reasons for your answer.

No Click or tap here to enter text.

We do not think that changes are likely to be required to some of the existing definitions within standard licence condition 1.

However, it is likely that new defined terms will have to be added either to standard licence condition 1 or to the relevant standard licence condition because the new process and associated obligations will give rise to new terminology.

### Chapter 2: General obligations and arrangements

#### Condition 4: No abuse of the licensee’s special position

45. Do you consider any modifications to licence condition 4 are required?

Please provide the reasons for your answer.

Yes Click or tap here to enter text.

We believe that the Distribution Network Operators (“DNOs”) are at risk of legal challenges being brought against them to the effect that, by applying National Energy System Operator (“NESO”)’s readiness and strategic alignment criteria and decisions, the DNOs will be engaging in conduct which amounts to the restriction or distortion of competition in the generation of electricity. For

example, the prioritisation and, therefore, differing treatment of some applicants for generation connections over others according to technology type, capacity and, potentially even, location.

We believe that this risk can be mitigated under Scenario 1, provided that it is made quite clear in NESO's methodology that the DNOs are not involved in NESO's decision-making process and the role of the DNOs is limited only to collating data and providing recommendations to NESO on whether or not the applications meet NESO's readiness and strategic alignment criteria.

If Ofgem decides to implement Scenario 2, whereby the DNOs would apply NESO's readiness and strategic alignment criteria before sending applications to NESO, we consider that, absent introduction of the specific licence obligation noted below, modifications to standard licence 4 would be required in order to remove doubt by clarifying that acting in such a way does not amount to the restriction or distortion of competition.

In any event, we strongly believe that a specific licence obligation should be introduced for the DNOs to comply with NESO's queue management process and implement any decisions NESO takes as part of that process.

## Chapter 4: Arrangements for the provision of services

### Condition 12: Requirement to offer terms for Use of System and connection

46. Do you agree with the policy intent to modify licence conditions 12.1 and 12.4 under both scenarios?

Please provide the reasons for your answer.

Yes [Click or tap here to enter text.](#)

We agree with the policy intent to modify paragraphs 12.1 and 12.4 of standard licence condition 12 under both Scenario 1 and Scenario 2.

Paragraph 12.1 of standard licence condition 12 should be modified to reflect the fact that the DNOs will not be required to offer to enter into an agreement for Use of System with applicants whose applications do not meet NESO's readiness and strategic alignment criteria because such applications will not progress to the making of a connection and so will not require an agreement for Use of System.

Paragraph 12.4 of standard licence condition 12 should be modified to make it clear that the DNOs will not be in breach of paragraph 12.4(c) in circumstances where the DNOs are required to comply with NESO's queue management criteria, including to comply specifically with NESO's readiness and strategic alignment criteria, and decisions in respect of an application because it is highly unlikely that a firm connection date will be available in those circumstances.

Amending standard licence condition 12 will not, however, absolve the DNOs from the duty to connect on request in section 16 of the Electricity Act 1989 (the "Act"), such that there is a risk that the new licence obligations may not align with the statutory obligations in sections 16 and 16A of the Act. Ofgem should, therefore, consider in due course whether section 17 of the Act should be amended to clarify that the application of NESO's readiness and strategic alignment criteria is an exception from the duty to connect under section 16 of the Act. If Ofgem does consider that such an amendment should be made, that

amendment should be drafted in such a way that it caters for future, related developments in order to avoid further changes being needed to take account of such matters.

In any event and as part of the process of modifying the licence, Ofgem should issue a policy statement that clarifies that it is not reasonable in all the circumstances for a DNO to be required to make a connection in the scenario whereby a DNO's compliance with NESO's readiness and strategic alignment criteria and implementation of the decisions NESO takes as part of that process results in a particular connection not being able to be made.

Such a statement would benefit all stakeholders and send an appropriate signal of Ofgem's position, such that the risk of Ofgem having to deal with a potentially significant number of requests for determination under section 23 of the Act is mitigated.

### Condition 19. Prohibition of discrimination under Chapters 4 and 5

47. Do you agree with our view that no changes to licence condition 19 are necessary under any of the two scenarios?

If no or you partially agree, please provide the reasons for your answer.

No Click or tap here to enter text.

The prioritisation and, therefore, differing treatment of some applicants for generation connections over others according to technology type, capacity and, potentially even, location may well amount to discriminatory conduct.

Consequently, we believe that the DNOs are at risk of legal challenges being brought against them to the effect that, by applying NESO's queue management criteria and decisions, the DNOs will not be compliant with the obligation in paragraph 19.1 of standard licence condition 19 to not discriminate between any person or class or classes of persons i.e. between one type of applicant for a connection and another.

48. If you disagree, what kind of change to the licence condition 19 do you believe is necessary?

Please provide the reasons for your answer.

We consider that a modification to standard licence condition 19 will be required and understand that Ofgem has expressed the view previously that discrimination by the DNOs must be "undue" in order for it to be in breach of standard licence condition 19. A modification to standard licence condition 19 is required in order to remove doubt by clarifying that the application of NESO's readiness and strategic alignment criteria and decisions by the DNOs does not amount to "undue" discrimination between one type of applicant for a connection and another.

We also strongly believe, as noted in response to question 45, that a specific licence obligation should be introduced for the DNOs to comply with NESO's

readiness and strategic alignment criteria and implement any decisions NESO takes as part of that process. Compliance with such a specific licence obligation would mean that the DNOs would not be “unduly” discriminating between one type of applicant for a connection and another because any discrimination that may arise would be as a result of the DNOs complying with that licence obligation.

These changes are required to be in place prior to July 2025, which is the time when, according to the most recent NESO connections reform plans being proposed to Ofgem for approval, customers are expected to be notified of NESO’s decision to include or exclude them from the “Gate 2 to Whole Queue” prioritisation exercise for existing projects.

## Chapter 5: Industry codes and agreements

### Condition 20. Compliance with Core Industry Documents

49. Do you see any risk related to introducing an obligation for DCUSA licensees to comply with the Clean Power 2030 Action Plan and SSEP?

Please provide the reasons for your answer.

Yes [Click or tap here to enter text.](#)

It is likely that the Clean Power 2030 Action Plan and the Strategic Spatial Energy Plan will be documents that include relatively generic statements, as opposed to the specific obligations contained in the current Core Industry Documents.

Consequently, including a specific obligation in standard licence condition 20 to comply with the Clean Power 2030 Action Plan and the Strategic Spatial Energy Plan would give rise to the risk that the DNOs would not be able to effectively assess how to comply with such generic statements.

50. Do you agree with the changes suggested to licence condition 20?

If no or you partially agree, please provide the reasons for your answer.

No [Click or tap here to enter text.](#)

We do not consider it appropriate to include in standard licence condition 20 an obligation to comply with the Clean Power 2030 Action Plan and the Strategic Spatial Energy Plan because it is likely that those documents will not be sufficiently clear as to the obligations that they actually place on the DNOs.

### Condition 12A. Requirement to progress User applications into the Gated Window process

51. Do you agree with the proposal to define a new licence condition 12A.1 – requirement to perform “Gate 2” checks in line with the NESO methodology?

Please provide the reasons for your answer.

Yes [Click or tap here to enter text.](#)

We agree in principle with the proposal to introduce new paragraph 12A.1 of new standard licence condition 12A but only such that the DNOs validate whether connection applications for small and medium embedded generation projects meet NESO’s Gate 2 readiness criteria.

In addition and as noted previously in this response, we strongly believe that a specific licence obligation should be introduced for the DNOs to comply with NESO’s queue management process and implement any decisions NESO takes as part of that process.

It would seem that new standard licence condition 12A would be the appropriate place to include that specific obligation such that the proposed licence condition should be extended to specifically include requirements for the DNOs to validate whether connection applications for small and medium embedded generation projects meet NESO’s Gate 2 readiness criteria and to comply with NESO’s decisions at Gate 2 regarding small, medium and large embedded generation projects.

52. Do you agree with the proposal to define a new licence condition 12A.2 – requirement to perform “Gate 2” checks in a timely manner? If so, do you consider the approach to the condition should be principles-based or prescriptive?

Please provide any information / evidence you can to support your response.

Yes [Click or tap here to enter text.](#)

We agree in principle with the proposal to introduce new paragraph 12A.2 of new standard licence condition 12 that the DNOs should, in a timely manner, validate whether connection applications for small and medium embedded generation projects meet NESO’s Gate 2 readiness criteria and send those applications that do meet the readiness criteria to NESO so that NESO then decides whether or not the application meets the Strategic Alignment Criteria.

In that respect, we support option 1 for new paragraph 12A.2 of new standard licence condition 12 to be principles-based, such that the DNO is obliged to take reasonable steps to complete the Gate 2 readiness criteria checks, notify the applicant of the recommendations and send qualifying applications to NESO as soon as reasonably practicable after the date on which the DNOs receive all of the information that the DNOs reasonably require for the purpose of performing the Gate 2 readiness criteria checks.

## New Conditions

### New Conditions 12A.3 and 12A.4 - Submission of projects for transmission assessment

53. Do you agree with the proposal to define new licence conditions 12A.3 and 12A.4 - this would introduce a requirement to submit projects for transmission assessment within a timely manner?

Please provide any information / evidence you can to support your response.

Yes Click or tap here to enter text.

We agree in principle with the proposal to introduce new paragraphs 12A.3 and 12A.4 of new standard licence condition 12 such that the DNOs must take reasonable steps to submit small and medium embedded generation applications for transmission assessment within the next available Gated Window following notification being given to the applicant that the Gate 2 criteria have been satisfied and to submit modification applications for large embedded generation applications within the next available Gated Window following receipt by the DNO of the modification notice from NESO.

## Proposed Electricity Transmission Special Licence Conditions

54. Do you think any Electricity Transmission Special Licence Conditions changes are required?

If you think that changes are required, please provide the reasons for your answer.

Transmission parties are best placed to comment.

## Proposed Electricity Distribution Special Licence Conditions

55. Do you think any Electricity Interconnector Standard Licence Conditions changes are required?

If you think that changes are required, please provide the reasons for your answer.

We assume that "Interconnector Standard" in question 55 is an error and it should read "Distribution Special".

We do not think any changes to the Electricity Distribution Special Licence Conditions are required.

## Proposed Electricity Interconnector Standard Licence Conditions

56. Do you think any Electricity Interconnector Standard Licence Conditions changes are required?

If you think that changes are required, please provide the reasons for your answer.

Transmission parties are best placed to comment.

## Proposed Electricity Generation Standard Licence Conditions

57. Do you think any Electricity Generation Standard Licence Conditions changes are required?

If you think that changes are required, please provide the reasons for your answer.

Generation parties are best placed to comment.

## General feedback

We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:

Do you have any comments about the overall process of this consultation?

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Do you have any comments about its tone and content?

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Was it easy to read and understand? Or could it have been better written?

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Were its conclusions balanced?

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Did it make reasoned recommendations for improvement?

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Any further comments?

No comments.