Good afternoon,

Please see below response to the consultation on Clarifying the regulatory framework for electricity storage: Statutory consultation on proposed modifications to the electricity generation licence;

The definition of a storage asset as an electricity Generating Station where the connection capacity is above 50MW captures larger storage schemes into a definition that is punitive in relation to the impact of a storage scheme.

For example, Generating Stations become national infrastructure projects which introduces disproportionate cost and delay for schemes that, in planning terms, have less impact than a large warehouse or farm building. Storage projects produce zero emissions, few traffic movements, and have low visual or noise impact.

In relation to grid code obligations, the current practice of NG ESO is to treat generation capacity aggregated in an SVA BMU from 1-150MW as one metering class. It is therefore not consistent or fair to impose a much greater regulatory burden onto a single storage facility (which competes directly with aggregated storage facilities) than an aggregated facility, unless there are clear reasons for doing so. Doing so will merely lead to less efficient deployment of storage, and higher costs to consumers. It is also possible to apply for license exemption between 50-100MW.

We therefore propose that storage assets do not become generating stations until a higher threshold is reached. This will provide certainty, consistency and proportionate regulatory impact for storage developers. The natural thresholds would be 100MW to tie in with potential license exemption, or 150MW to align with treatment of aggregated BM units.

Kind regards,

Becky

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Becky Eggs | Administrator
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