

## **Response to Alternative Connection Application and Offer Process Proposal**

### **March 2016**

**Question 2: Do you consider that the underpinning principles of the proposed connection application and offer process at a high level address the approach necessary to deal with the influx of connection applications? Can you suggest any further principles that should be considered?**

Green Switch is positive towards the proposed connection application and offer process, we agree this is necessary to deal with the high volume of applications. The proposals will also prevent developers spending time and money on the planning process, only to find their project is not viable due to grid costs and/or constraints.

Green Switch's business model in the UK is to conduct an initial planning assessment, then apply for a connection offer with the local network operator. Once this connection offer is received and is financially viable, we then prepare planning documentation over a period of 2-3 months, before submitting. Evidently, carrying out this process in reverse is not practical. Therefore, we welcome the proposed changes.

**Question 4: Do you agree with the proposal to remove all consenting requirements for transmission connection applications?**

We agree with the proposal to remove consenting requirements. The planning process can take years to complete in some cases. Obtaining a connection offer prior to applying for planning permission will save time and money.

**Question 6: What do you believe would be an adequate length of time between a decision paper from this consultation process being issued and the proposed Closure Date? Do you agree that a 4 week period would be adequate? Please provide reasons for any preference.**

We agree that 4 weeks would be adequate.

**Question 13: Do you agree that the proposal to order the transmission assessments of the Groups based on the Groups with the earliest individual Valid Connection Application is a practical approach? If not, can you suggest any alternatives?**

We agree that the earliest submitted, valid connection applications should form the basis of the group assessments. However, we would suggest publication of clear guidelines on how to submit a 'valid' connection application be published. The UK RO scheme has seen the addition of the word 'valid' to planning application in regards to the RO submission deadlines, this has led to legal action being taken by a number of firms against DECC. Therefore, it is in the interest of all parties to publish clear guidance on the validity of connection offer applications.

**Question 14: Do you believe it would be a prudent approach in the first instance for the TSO to determine whether there is existing grid capacity and issue offers where there is capacity as a priority, accepting that other applicants not included in this phase 1 would need to wait longer for connection offers?**

We agree with this approach, on the basis that the details of existing spare capacity are made publically available to developers. The details being the location and the amount of available capacity. This will allow for transparency within the industry and will avoid time and money being spent on connection applications in areas where there is no spare capacity.

**Question 16: In order to reduce time, it is proposed to allow a period of 10 days from information on initial nodal assignment being provided for a decision to be made on whether to withdraw from an application from the process. Do you consider that the suggested 10 day period will provide an adequate balance between reducing delays and allowing high level decisions to be made by developers?**

We do not consider 10 days to be sufficient. We believe 20 business days is sufficient for the customer to consider the connection offer, as this allows enough time to assess financial and practical viability of the offer.

**Question 17: Do you believe that high level information on estimated nodal assignment, connection method, potential charges and estimated timeframes for delivery would be of value and enable a decision to withdraw early to be made?**

Yes, any information which can be made available to the generator will aid the decision making process.

**Question 19: Do you agree with the proposal to share the costs of common connection assets between applicants on a per MW basis as described?**

Yes, we believe this is a fair method to allocate costs. This removes the advantage for generators further back in the queue connecting to a system which has already undergone major upgrade works, paid for by the generator further up the queue.

**Question 20: Do you think Proposal A or Proposal B is preferable for entry into the FAQ list? Do you have any other suggestions for entry into the FAQ list?**

We suggest proposal B to be preferable for entry into the FAQ list, as this method removes all requirements of planning permission in order to secure capacity.

**Question 23: Is it essential for GOR information to be issued along with FAQ and ATR information or is GOR information alone sufficient information for an offer to be accepted?**

The more information which can be provided, the easier it will be for generators to determine the viability of the connection offer.

**Question 25: Do you agree that project milestones relating specifically to securing planning permission are required now that the planning permission pre-requisite has been removed for applications to the Distribution System? What do you believe to be an Alternative Connection Application and Offer Process –Consultation Paper Page 49 adequate length of time to secure planning permission after a connection offer has been accepted?**

We agree with the proposed milestones. However, we believe that the 12 month period for obtaining planning permission should be extendable. Generators should submit an application to extend the milestone and this should be assessed by the operator, based on the progression of the planning application. This could take for of a grace period, where generators are required to meet certain criteria to be eligible for an extension.