Evidence submission for G2TWQ

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Context

Who am I?

What is the Grid Reform process?

The evidence

Land or planning

Red line boundaries

Milestones

Strategic alignment

The process

Where are the challenges

Where are the opportunities?

What next?

What should you do now?

Q&A

Section 01

Context

ABOUT LOCOGEN

Locogen is a consultancy specialising purely in clean energy.

We are a team of 65 multi-disciplinary experts, based in Edinburgh and working across the UK.

Since 2009, we've been accelerating the transition to a more sustainable world by supporting our clients to design, develop, build and operate renewables assets.

- Bespoke services spanning every stage of the project life cycle
- Hundreds of schemes successfully completed
- Expert support for**:**
    - larger, grid-connected projects for utility-scale clients
    - decarbonisation and generation schemes for energy transition clients
- Leaders in sector innovation:
    - our solar-specific proprietary tool identifies the most productive layouts
    - currently managing national projects to demonstrate green hydrogen potential

UK Grid reform – what does it mean?

Why? To address long grid connection delays and unlock capacity for Net Zero.

What's Changing? Transition from "*first-come, first-served*" *to "first-ready, first-connected*".

Key Reform: CMP435 Gate 2 Reprioritising the existing connection queue based on Readiness and Strategic Alignment.

Who's Affected? All embedded generation and storage projects above the TIA threshold with existing agreements.

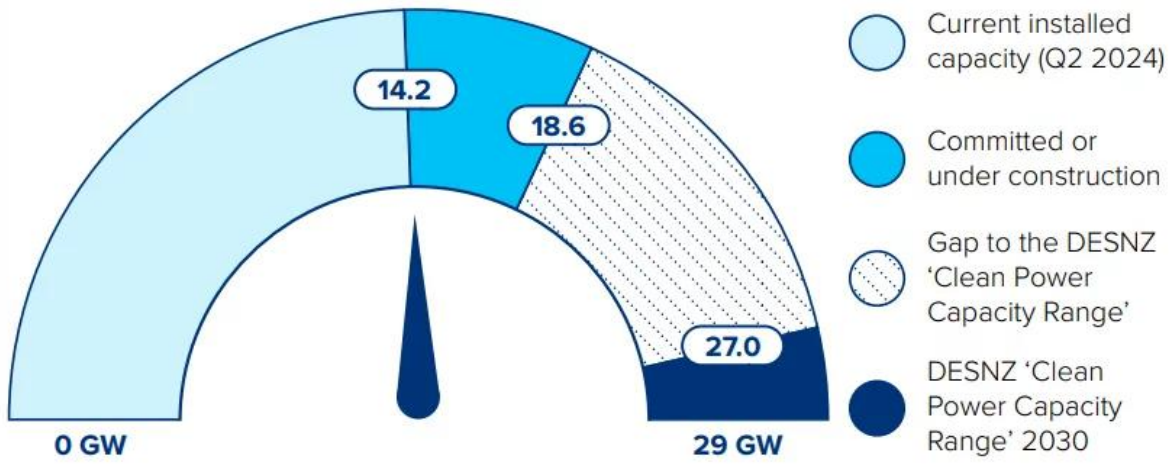
Gate 2 Submission Projects must submit a Readiness Declaration (land or planning evidence) to retain queue position.

Risk of Inaction Projects that do not submit will drop back to Gate 1 and lose their current position.

Spatial planning

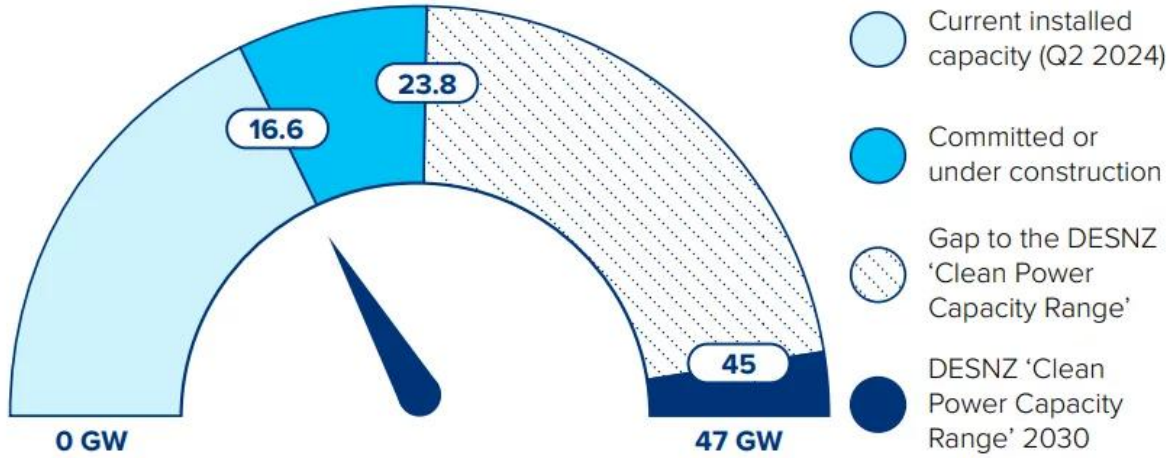
Onshore Wind

Current installed capacity compared to the DESNZ 'Clean Power Capacity Range' in 2030 (GW)



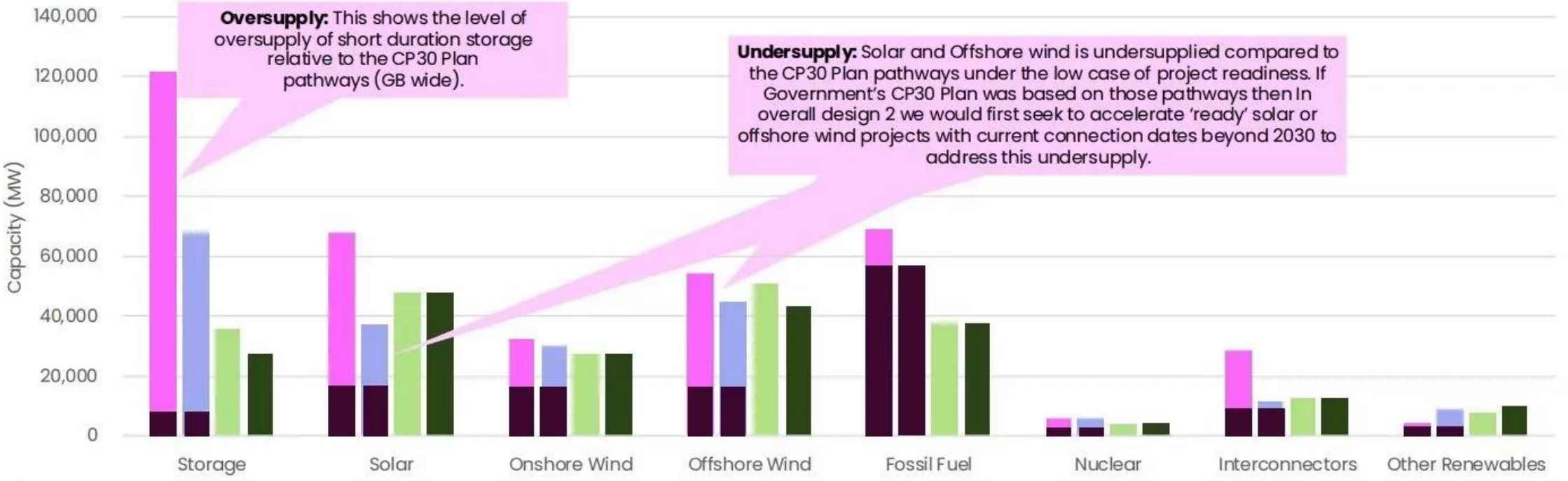
Solar

Current installed capacity compared to the DESNZ 'Clean Power Capacity Range' in 2030 (GW)



Spatial planning

Figure 3. Connections Queue to 2030, compared to 2030 pathways in NESO's CP30 report



Current Built Capacity: Current built generation capacity [20]

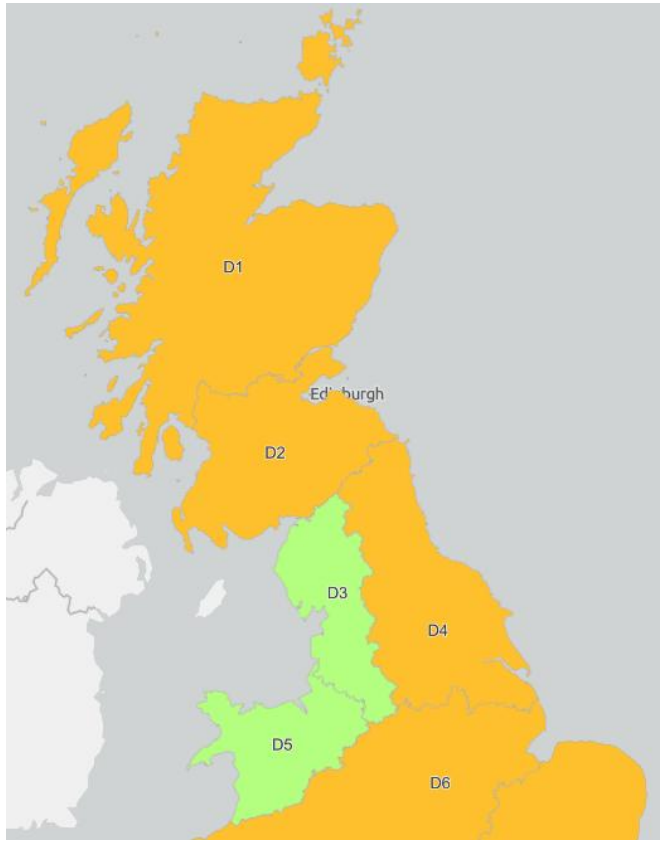
Full Queue to 2030: The connections queue with connection dates from now until the end of 2030 including transmission and distribution.

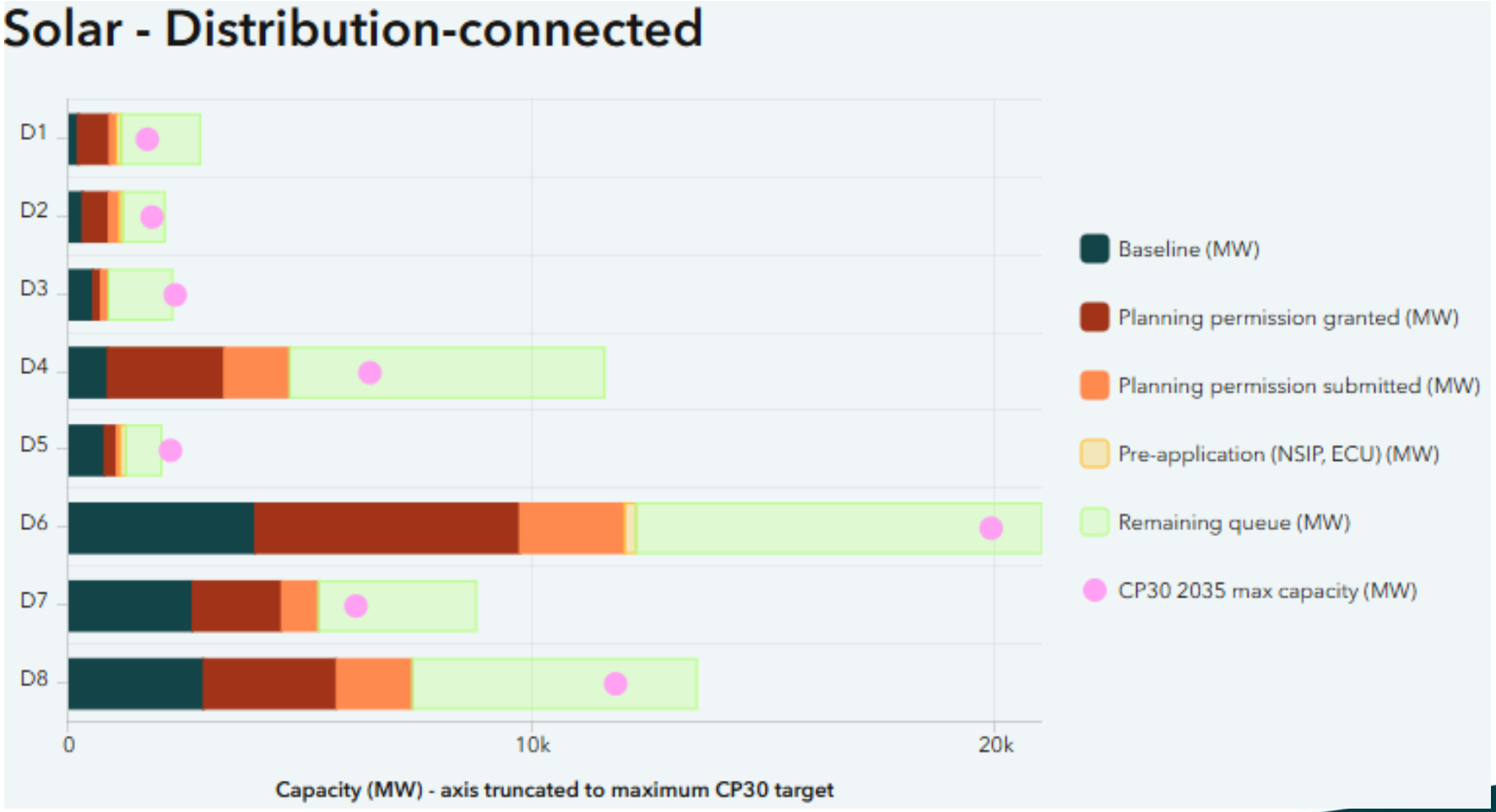
Low case: The connections queue until the end of 2030, based on project capacity for those that responded to the RfI and stated that they had land at time of RfI (June 24) [21]

CP30 Plan pathways: CP30 Plan pathways generation capacity per technology

[20] *Exception for Nuclear. Built projects is adjusted to only include Sizewell B (only project online in 2030). For low case, known Nuclear projects with land which is deemed more accurate than RFI.*
[21] *Exception for low case; for offshore wind, crown estate lease data has overridden RfI data as is deemed to be more accurate. Low case only includes projects with a full seabed lease.*

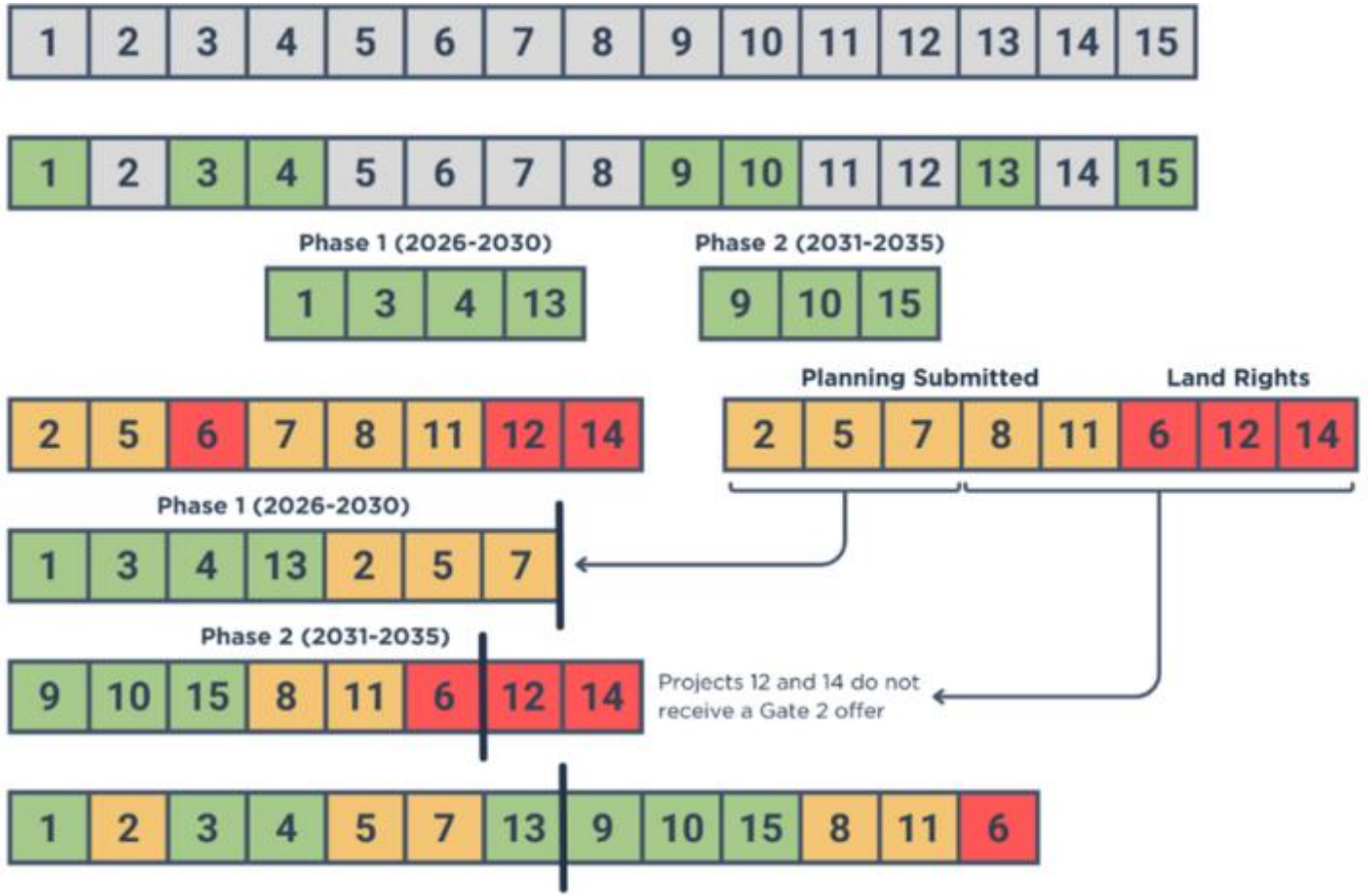
Spatial planning





Gate 2 to Whole Queue process (G2TWQ)

1. **Form a sub-queue for each technology in each zone (e.g. Solar in Transmission Zone T1)**
2. **Identify projects that are eligible for 'protections'**
3. **Assign these projects to a phase, based on their contracted connection date, or advancement date where requested***
4. **Determine the planning status of the remaining projects and order them based on this planning status**
5. **Relevant TO/DNO identify any network limitations preventing advancement (prior to detailed network study)**
6. **Where remaining projects have an existing or requested date of 2030 or earlier, add them to Phase 1 until the permitted capacity is reached**
7. **Add the rest of the remaining projects to Phase 2 until the permitted capacity is reached. Any exceeding this will not receive a Gate 2 offer**
8. **Return Phase 1 projects to existing relative queue positions and recombine Phase 1 and Phase 2**



*if the 2030 permitted capacity is reached at this stage, all remaining 'green' projects will be allocated to Phase 2, even if this results in the 2035 permitted capacity being exceeded.

Jargon

- **Clean Power 2030 (CP30)** – Strategic action plan to accelerate low-carbon energy development, used as the primary alignment benchmark.
- **TMO4+ (Target Model Option 4+)** - This is the overarching reformed connections process for Great Britain's electricity system, approved by Ofgem in April 2025
- **CMP434 (Implementing Connections Reform)** – A code modification that introduces new enduring processes and definitions for the connections system
- **CMP435 (Application of Gate 2 Criteria to existing contracted background)** – A code modification to reprioritise grid connection queues based on project readiness and strategic value. Sets out the process for G2TWQ.
- **Gate 2 to Whole Queue (G2TWQ)** - A one-off, evidence-based process specifically for existing connection agreements to be assessed against the latest Gate 2 criteria and strategic energy plans
- **Gate 2** – One-off process to re-assess all existing connection agreements based on evidence of readiness and alignment with strategic energy plans.
- **Gate 1** – The original position in the queue; projects that do not engage with Gate 2 will revert to this baseline status.
- **NESO** – *National Energy System Operator* - New operator responsible for whole system planning, previously National Grid ESO.
- **DNO** – *Distribution Network Operator* - Companies responsible for electricity distribution at local levels (e.g. SPEN, SSEN, UKPN, ENWL).
- **iDNO** – *Independent Distribution Network Operator* - Privately operated networks that manage connections and infrastructure alongside DNOs.

Jargon (2)

- **Readiness Declaration** – A formal submission demonstrating that a project is viable and progressing, based on land rights or planning status.
- **Strategic Alignment Criteria** – A set of eligibility rules to prioritise projects in the queue, including CP30 alignment, project designation, or protections.
- **Designated Project** – A project recognised by NESO or government as strategically critical; must still meet Gate 2 readiness.
- **Protections (under CMP435)** – Allowances for projects already significantly progressed or due to connect before end of 2026.
- **Queue Management Milestones (QMMs)** – Timed requirements for developers to show progress toward energisation; must be evidenced in Gate 2.
- **TIA Threshold** – *Transmission Impact Assessment Threshold* - Capacity level above which projects are deemed to have material transmission impact
- **Modification Application (ModApp)** - A formal CUSC request to make changes to an existing grid connection agreement
- **Original Red Line Boundary** – The clearly marked outermost geographical boundary of the project site. It needs to include all land associated with the project's installed capacity and meet minimum acreage requirements
- **Developer Capacity** – The MW capacity a developer is declaring for consideration under Gate 2 (used for alignment/assessment).
- **Hybrid Projects** - Projects that combine more than one technology (e.g., solar PV and Battery Energy Storage Systems)

Does this process apply to you?

Grid offer

- Issued and accepted a grid offer, and TIA started, prior to 29th Jan 2025
- You have not yet energised
- You have a connection offer before 2035
- You should have been contacted by your DNO

Technical

Relevant to any project requiring a TIA:

- Mainland Scotland: Projects with an export capacity above 200 kW
- Scottish Islands: Projects with an export capacity above 50 kW

Gate 2 offer (prior to 2030)

If you want to keep, or advance to Gate 2, you must:

- Meet the Readiness Criteria
- Meet one of the four Strategic Alignment criteria

Section 02

The Evidence

Grid Readiness declaration process

Split into key sections

Part 1 – General details

Part 2 – Advancement / capacity reduction

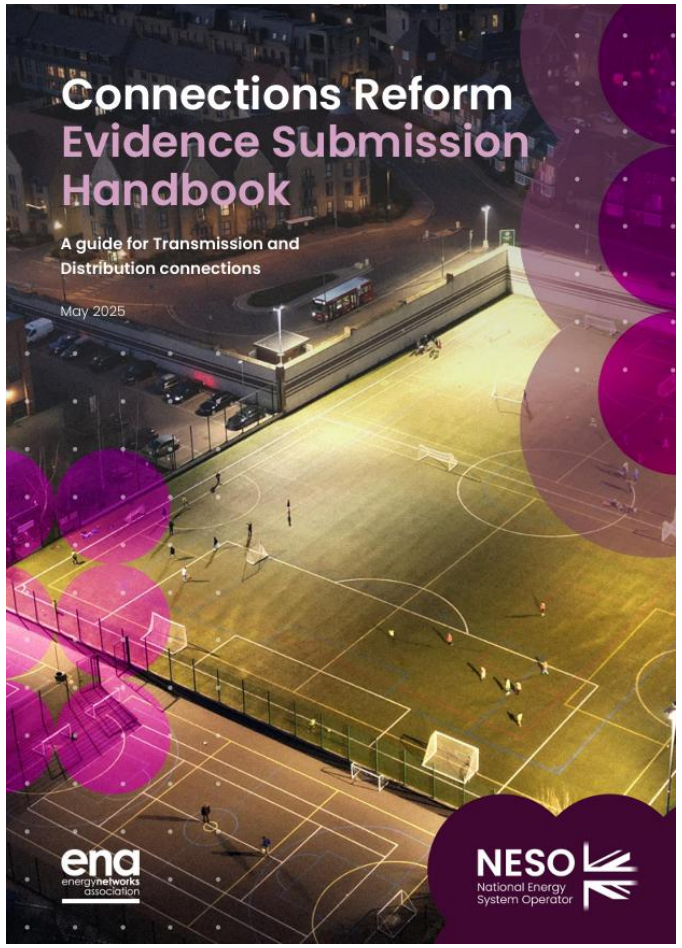
Part 3 – Gate readiness

Part 4 – Declaration

Part 5 – Gate 2 strategic alignment criteria

Part 6 – Additional data for queue formation

Part 7 – Agreement to have data published



https://www.neso.energy/document/361056/download

Part 1 – General details

Part 1 – General details

Registered Number

- Process assumes all applicants are companies with a company number
- If you are not, you need a letter signed by a director to explain why you do not
- If ownership is due to change, you need a letter to explain this

Other information is standard

- Name
- Address
- Grid coordinates
- DNO ref number
- Technology(s)

Part 2 – Advancement and capacity reduction

Advancement

Requirements

- You must declare the earliest date you can accept
- You have to ask for more than 1 year
- If you ask for an advancement between phases (from after 2030 to before 2030) – no rejection possible
- If you ask for an advancement within a phase, you can reject

Risks

- Security payments will likely come earlier – no gauge on what these will be in advance
- ModApp fee payable and non refundable - £11,250

Capacity reduction

Considerations

- Can reduce capacity of the connection but not increase
- Cannot split the capacity (i.e. to accelerate a proportion)
- Can remove a technology (eg BESS)
- May incur cancellation charges
- May change POC if a large change

Part 3 – Gate 2 readiness

Gate 2 offer requirements

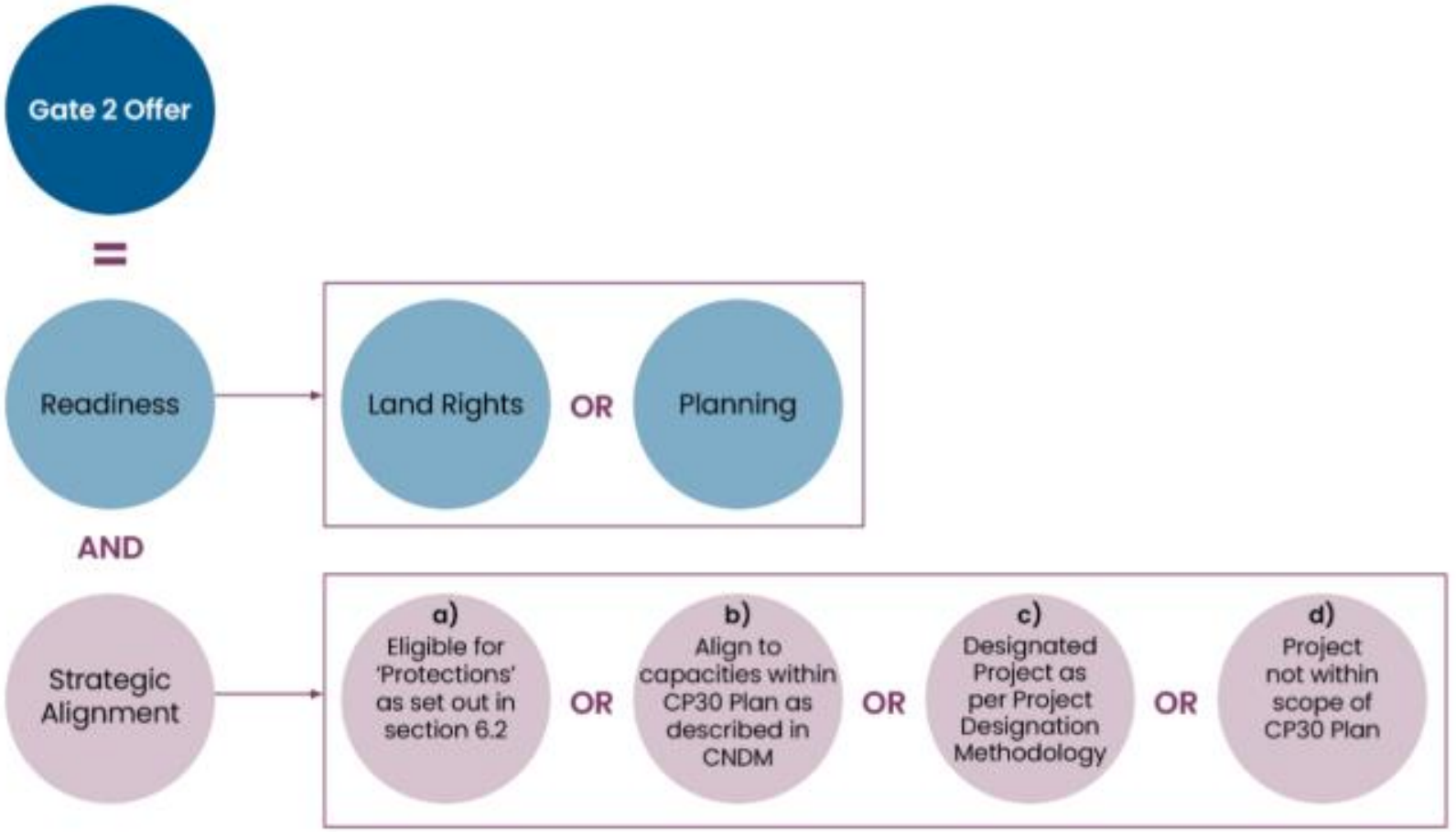
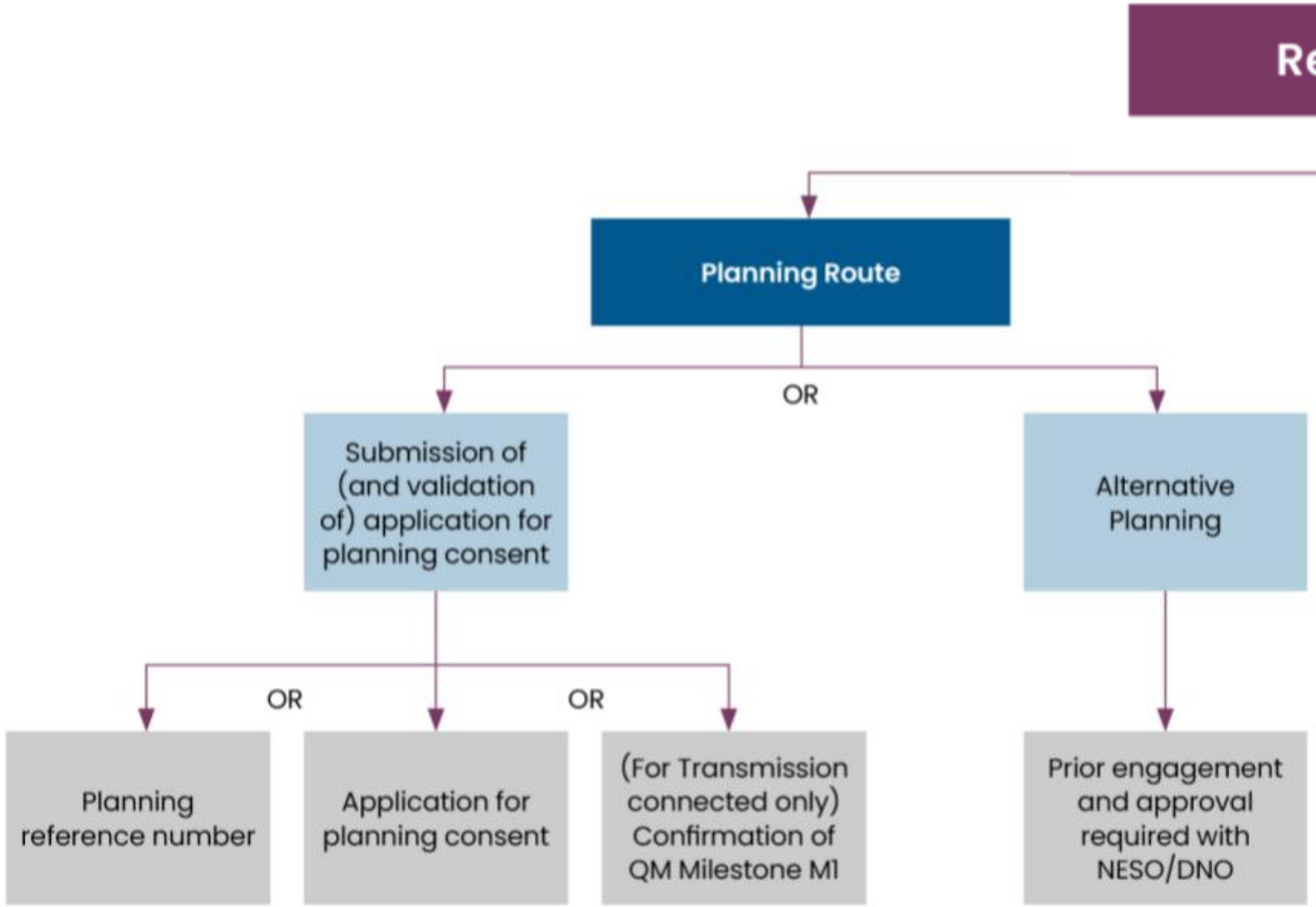


Figure 2: Gate 2 Readiness Criteria land and planning routes

Planning route



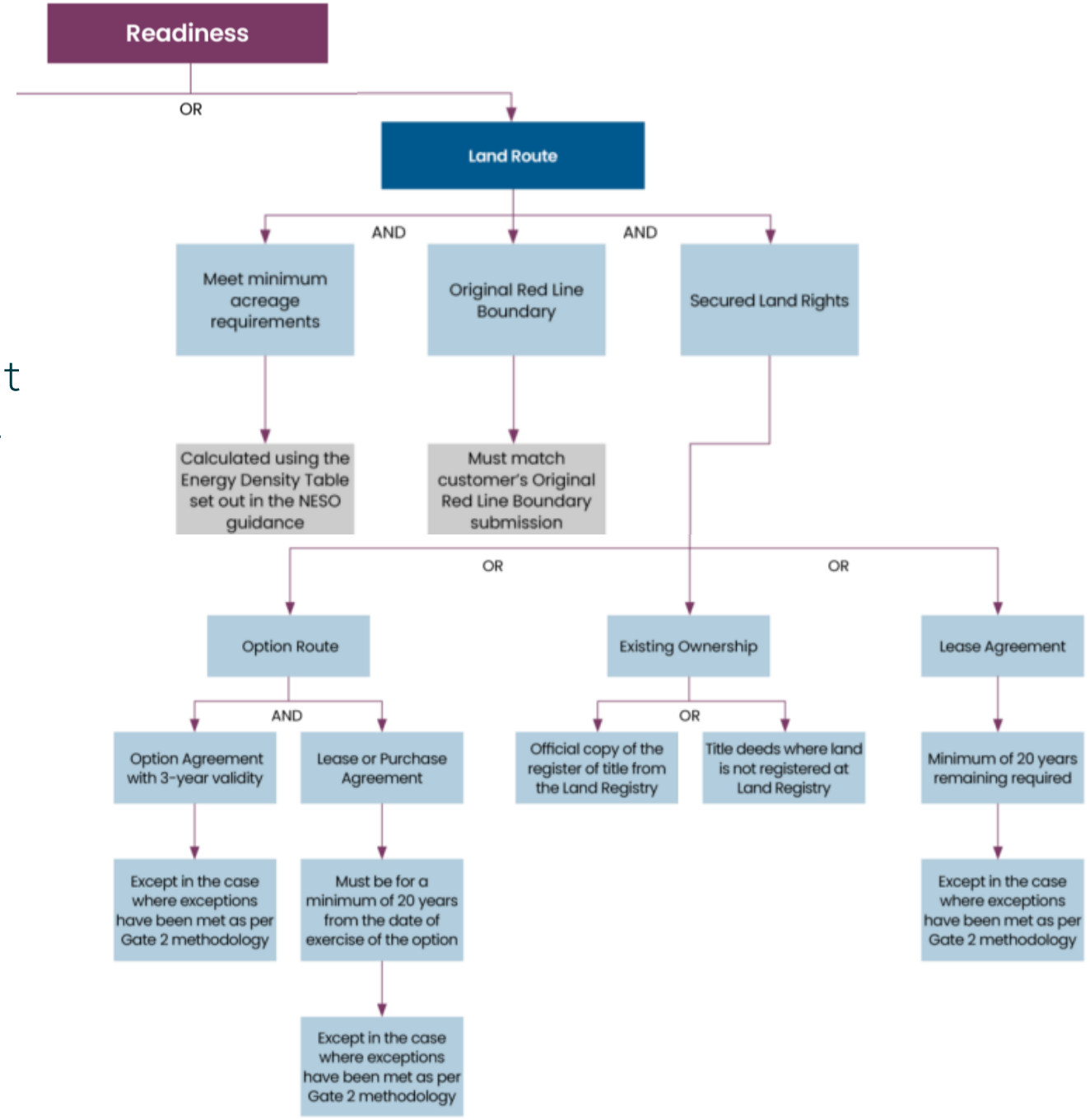
Only available to projects:

- going through the Development Consent Order (DCO) process; or,
- Utilising Compulsory Purchase Order (CPO)

Most projects will not use this route

Land route

Expected route for most projects to show Gate 2 readiness



Original Red Line Boundary

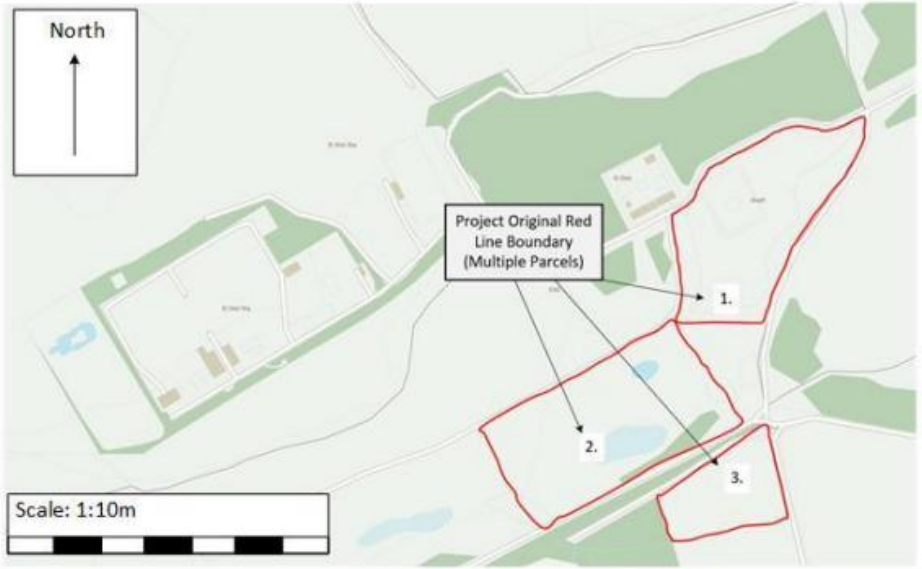
Requirements

- Very specific layout requirements
- Land area to 4 decimal places
- Technology to 1 decimal point
- Coordinates of compass extreme points

Minimum acreage land density

- Solar PV: 1.1603 acres per MW
- Onshore Wind: 7.6829 acres per MW
- Battery Energy Storage Systems (BESS): 0.0099 acres per MW

J. Smith Generation Project Limited



Site Address:
Land South of Murton Substation, Pit Road, Murton, Seaham

Postcodes (nearest):
SR7 9JP

Technology Installed:
30.0MW of Solar PV

Land Acreage of site:
Parcel 1: 0.5011 Acres
Parcel 2: 0.6011 Acres
Parcel 3: 0.2011 Acres

Grid Coordinates (WGS84 Format) Whole Site Area:
Northerly Extreme Latitude: 54.806
Northerly Extreme Longitude: - 1.395

Easterly Extreme Latitude: 54.804
Easterly Extreme Longitude: -1.395

Southerly Extreme Latitude: 54.800
Southerly Extreme Longitude: - 1.394

Westerly Extreme Latitude: 54.802
Westerly Extreme Longitude: - 1.400

Part 4 – Director declaration

Director declaration

Considerations

- If no formally appointed Director, you will need a letter of Authority

Part 5 – Strategic Alignment

Strategic alignment

(a) Eligible for relevant 'Protections':

These typically apply to existing agreements that are significantly progressed or contracted to connect by a specific early date (e.g., end 2026 or 2027 under CMP435).

(b) Aligned to the capacities within the Clean Power 2030 Action Plan:

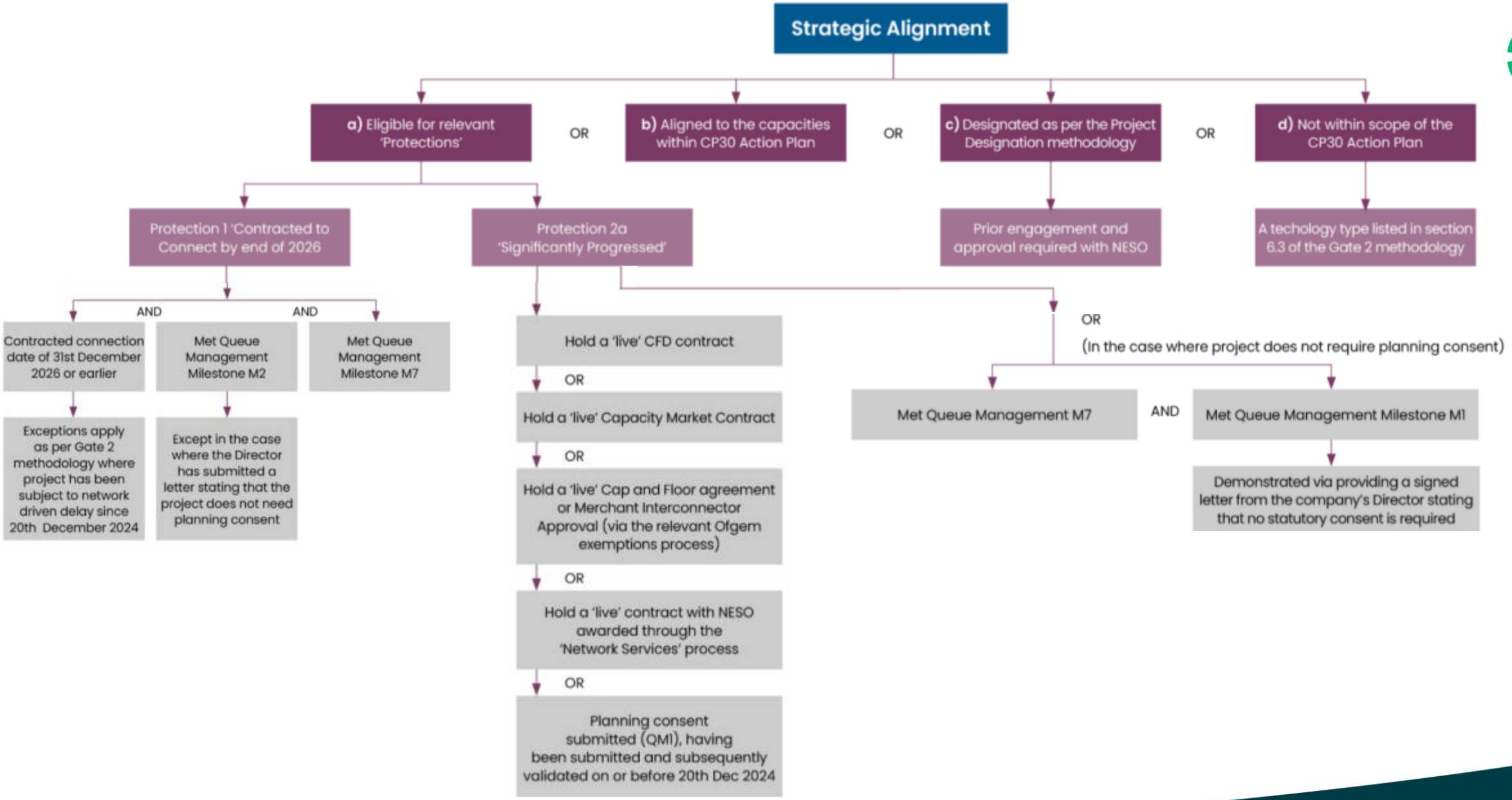
This is where most projects are expected to align. The plan sets out permitted capacities by technology type (e.g., Onshore Wind, Solar, Batteries) and often by Transmission and Distribution 'zones'. NESO and DNOs calculate the remaining available "permitted capacity" by deducting already installed/operational capacity.

(c) Designated by NESO

For projects critical to security of supply, system operation, reducing constraints, new/innovative technologies, or with very long lead times. This is a formal application process to NESO.

(d) Out of scope of the Clean Power 2030 plan but of a listed technology type:

Technologies like Wave, Tidal, Run-of-River Hydro, Geothermal Power, and Transmission-connected Demand are out of scope of the CP30 Action Plan. Projects with these technologies will automatically meet the Strategic Alignment Criteria (d) if they meet readiness, and are not bound by a *'permitted capacity'.*


Strategic Alignment
a) Eligible for relevant 'Protections'
OR
b) Aligned to the capacities within CP30 Action Plan
OR
c) Designated as per the Project Designation methodology
OR
d) Not within scope of the CP30 Action Plan
Protection 1 'Contracted to Connect by end of 2026
Protection 2a 'Significantly Progressed'
Prior engagement and approval required with NESO
A techology type listed in section 6.3 of the Gate 2 methodology
AND
AND
Contracted connection date of 31st December 2026 or earlier
Met Queue Management Milestone M2
Met Queue Management Milestone M7
Exceptions apply as per Gate 2 methodology where project has been subject to network driven delay since 20th December 2024
Except in the case where the Director has submitted a letter stating that the project does not need planning consent
Hold a 'live' CFD contract
OR
Hold a 'live' Capacity Market Contract
OR
Hold a 'live' Cap and Floor agreement or Merchant Interconnector Approval (via the relevant Ofgem exemptions process)
OR
Hold a 'live' contract with NESO awarded through the 'Network Services' process
OR
Planning consent submitted (QM1), having been submitted and subsequently validated on or before 20th Dec 2024
OR
(In the case where project does not require planning consent)
Met Queue Management M7
AND
Met Queue Management Milestone M1
Demonstrated via providing a signed letter from the company's Director stating that no statutory consent is required

Milestones

Milestone	Evidence Requirement	Examples of Acceptable Evidence
Milestone 1 - Initiated Statutory Consents and Planning Permission	Submission of planning application to the relevant Statutory Authority or, if the project does not require a statutory consent, a declaration from the User to that effect.	Planning application reference number; or signed declaration letter from Director if no consent required.
Milestone 2 - Secured Statutory Consents and Planning Permission	Planning decision notice confirming permission granted aligning with Construction Agreement terms. Ongoing compliance required.	Local Authority-issued permission with site, tech, MW details. No outline permissions or meeting minutes.
Milestone 3 - Secure Land Rights	Proof of ownership, tenancy, lease agreement, option to lease/purchase, or offshore seabed/onshore rights as appropriate.	Signed legal documents demonstrating site rights in line with Gate 2 Methodology.
Milestone 4 - N/A for Transmission	Not applicable to transmission-connected projects.	None.
Milestone 5 - Contestable Design Works Submission	Written confirmation that design obligations under User-Self Build agreement are received.	Email/letter confirmation from the Relevant Transmission Licensee (RTL).
Milestone 6 - Agree Construction Plan	User's construction plan aligned with Commissioning Programme and Completion Dates. Must include fixed dates.	Email/letter from RTL confirming agreement of construction programme.
Milestone 7 - Project Commitment	Evidence of FID, binding contract, capital contributions, or awarded subsidy.	Signed Board paper; contract copies; capital contribution receipts; subsidy award document.
Milestone 8 - Initiate Construction	Commencement of construction activities.	Board letter confirming start; optional photo evidence; contractor invoices.

Part 6 – Additional data

Additional data

Queue formation process

- This is where projects under Strategic Alignment B, C and D can provide additional data:
  - Do you meet Milestone M1 (planning applied)
  - Are you a BESS site but not importing (arbitrage)
  - Are you a LDES BESS project?

Part 7 – Published data

Section 03

The process

How to submit

Different DNO's – different processes

SSEN:

- Accepting applications via the 'Ready Portal'
- Affected customers will be emailed a link along with guidance

SPEN:

- Accepting applications via email
- Submit Readiness Declaration and evidence to SPDSOW@scottishpower.com

Submit ASAP, but deadline 29th July

Any Questions

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