

Email to:

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20 January 2025

Dear NESO,

Response to TCSNP2 Refresh Methodology consultation

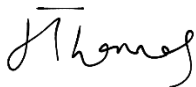
Scottish Renewables is the voice of Scotland's renewable energy industry. The sectors we represent deliver investment, jobs and social benefits and reduce the carbon emissions which cause climate change. Our 360-plus members work across all renewable energy technologies, in Scotland, the UK, Europe and 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.

Scottish Renewables welcomes the opportunity to respond to Ofgem's consultation on its proposed methodology for a TCSNP2 Refresh. While some of our members question the inherent need for a Refresh ahead of a closely followed CSNP, we hold additional concerns around the feasibility of producing an accurate Refresh with the final details of Connections Reform and Clean Power by 2030 (CP30) yet to be finalised. Our response focuses on the need for greater clarity on the processes behind a range of areas within the document to crystallise industry understanding and in turn, appease industry concerns.

Scottish Renewables and RenewableUK would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely,



Holly Thomas

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Stephen McKellar

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Summary methodology to improve readability and accessibility – are our publications appropriately accessible? YES/NO (Please provide comments on the above question and reasoning for your answer)

Providing an executive summary with subsequent detailed annexes on the process steps was helpful in offering a higher-level view for industry digesting numerous consultations in a condensed timeframe.

Is our proposal to produce a main TCSNP2 Refresh publication, detailed report and workbook helpful? YES/NO (Please provide comments on the above question and reasoning for your answer)

Given the limited timeframe associated with this consultation amid the festive period and the concurrence with the consultation on the Strategic Spatial Energy Plan (SSEP), Members are not currently in a position to provide a meaningful response.

Is there anything you would change or include in our main publication or technical report? If so, what?

Scottish Renewables has previously questioned the purpose of an additional step of a TCSNP2 Refresh and potential issues associated with introducing this interim reassessment. NESO should thus include greater contextual detail within the final methodology document of their justification for this process to aid industry understanding. Distilling the core objectives of this Refresh while more explicitly illustrating how it interacts with existing and forthcoming plans, such as the TCSNP2 and CSNP, will further aid understanding of its identified need.

Specifically, clarity around how the TCSNP2-Refresh will remain relevant with the incoming Strategic Spatial Energy Plan (SSEP), potentially significantly changing assumptions around the generation mix for post 2030, to then be followed by a comprehensive Centralised Strategic Network Plan (CSNP), would be welcome. At present, the TCNSP2-Refresh methodology process appears silo-ed, building on the TCSNP2, and so closer integration with the other plans, regardless of varying levels of process maturity, will be critical.

Regarding the inputs to the methodology, the Refresh summary methodology states that it will align with the outcomes of the Clean Power by 2030 (CP30) plan. Exactly how this will be achieved, particularly when considering the two potential pathways (2030 and 2035), while integrating FES24 data is unclear. If data from the FES24 is to be included, greater detail around which elements will be included and how is necessary. However, greater emphasis should be placed on the use of the CP30 data if the Refresh is to have sufficient impetus as an investment signal for developers and network operators.

Additionally, a stark omission from the methodology is any acknowledgment of Connections Reform and the new filter of 'needed' projects reshaping the landscape of required connections. Greater clarification on how this will be accounted for once implemented in 2025 within the methodolog(ies) is needed to give the Refresh greater credibility. We suggest that the Refresh be aligned to the output of the Gate 2 to whole queue exercise, such that the Main Interconnected Transmission System (MITS) can be developed in an economic, efficient and coordinated way. To avoid further ambiguity, it should be explicitly clarified that there is no risk of the TCSNP2-Refresh overwriting Gate 2 offers that are made following implementation of the Reform throughout this year, i.e., offers representing the final position and not subject to alteration following the Refresh in early 2026. Failure to sufficiently account for this fundamental reform risks undermining the output of the Refresh.

Finally, it is apparent that the appendices methodologies for the TCSNP2 Refresh are far more mature in terms of technical detail than those included for the SSEP and the CSNP, presumably drawing upon previous methodologies used in the HND/HNDFUE. However, this is a presumption and clarification around whether it is a continuation or refresh of tried and tested methodologies would provide greater certainty of process for projects connecting earlier. If the methodologies are, in fact, novel or significantly changed, concern around the limited timeframe to respond is exacerbated given the level of detail to analyse and the importance of the processes potentially becoming embedded for the subsequent SSEP and CSNP.

How effective is our methodology at identifying the optima course of development of the national electricity transmission system?

The recognition and subsequent level of industry input and engagement referred to in the methodology is a cause for concern when considering the intended effectiveness of the methodology. At the heart of these systemic, industrial energy plans, industry must feature more prominently in the plan around stakeholder engagement. More granularity including a detailed categorisation of different industry stakeholders as well as how regular engagement will be practically applied to ensure meaningful engagement before processes are solidified is a pre-requisite for success.

Aside from external engagement, it is imperative that the background in which the TCSNP2 is based not be changed where possible to ensure the validity of the output of the Refresh. For example, a component of the project WCN2 (New circuit between south-west Scotland and north-west England).has been recommended by the NESO to be the first project to go to competitive tender. If agreed by Ofgem, this project will be subsequently removed from the Refresh. Removing this from the background of the TCSNP2-Refresh will result in the boundary capacities used as part of the initial TCNSP2 differing from those of the Refresh, in turn skewing the final result and undermining the Refresh itself.

Your rating of how effective the methodology is at identifying the right way to develop the national electricity transmission system

6/10.

General comments on the TCSNP2 Refresh methodology

An overriding comment is the severely constrained timeframe provided to respond meaningfully to this consultation amidst other ongoing consultations and the festive period. Having initially engaged with you directly on this concern, we are aware of the urgent pace of work required to meet external and internal targets. However, requesting a response on the TCSNP2-Refresh in parallel with consultations on the SSEP and CSNP, which arguably hold much greater value in reforming our energy system for the next 20 years, seems irresponsible and we would urge NESO to consider its approach for future consultations.

Where sectors are developer-led (essentially all generation, storage and interconnectors), introducing process changes, such as the transition to Strategic Energy Plans, without absolute clarity of the implications on these sectors risks halting origination and development until such time as this process has concluded or clarity is provided. While we recognise the motivation behind these changes is to accelerate infrastructure build out, there is a risk that the change, if not carefully managed and communicated, will lead to the opposite.