









RenewableUK

6 Langley Street London WC2H 9JA United Kingdom

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Kayte O'Neill
Chief Operating Officer. National Energy System Operator
Faraday House
Warwick Technology Park
Gallows Hill
Warwick CV34 6DA

Via email

Dear Kayte,

We were pleased to see the open letter from NESO published on the 16th July, and welcome the recognition of the issues that our members have faced submitting their problems to the portal, and the opportunity to attend daily webinars to track NESO's progress and raise queries.

It's encouraging to see NESO acknowledging the challenges experienced by applicants using the portal and taking active steps to address them. Efforts to date are welcome, but major issues remain, preventing our members from completing Gate 2 submissions for their projects. It is critical that NESO does everything in its power to address these issues as efficiently as possible.

Overall, we believe that **NESO** has not fulfilled its statutory duty until all projects have had a full two-week period to submit without issues preventing them from doing so. It is highly unlikely that this will be possible within the parameters of the minimum fiveday extension. We understand that there are risks to downstream milestones by delaying the end of the submission window, but this is clearly outweighed by the risk to Clean Power delivery and investor confidence from an incorrectly reordered connections queue.

Further to this, the following changes are needed to restore confidence in the submissions process:

The minimum five-day extension is welcome, with the understanding that an
extension beyond minimum will likely be necessary. However, customers should
have longer notice at the time NESO feel ready to shut the window, particularly as

many customers will be planning holiday over this period. A ten-day notice of intent to close is required, and should be announced only once the all the errors in the portal have been resolved. This aligns with the minimum statutory period set out in the CUSC.

- Customers should be able to 'mark NESO's homework' during this process. NESO should publish a live list of known defects as well as a status update, and there should be a way for customers to challenge 'solved' defects if they feel the problem persists.
- NESO should not be able to unilaterally close portal queries. This is leading to significant frustration from members who do not feel their query is adequately addressed, causing them to have to start the query process all over again.
- Customers should have an ability to download a copy of their submission. This is
 especially critical as customers that have submitted to the portal may have used
 workarounds that will be made invalid by changes later implemented by NESO.
- Similarly, there should be a grace period where customers are able to edit and
 resubmit their applications. Customers need to have confidence that changes are
 not being made, albeit unintentionally, in the backend after submission given that
 both data and IT fixes are being applied in the background.
- Early submissions from customers were promised a longer turnaround for queries on submissions - this should be extended due to the issues many have faced beyond their control.
- Given the number of issues faced by customers, there must also be a clear resolution process post-window. Projects must not be penalised if an incorrect decision is made based on human or technical error. This process must include a clear escalation pathway, even if initially limited to questioning.

We remain committed to working with NESO to support the delivery of connections reform, and we appreciate your continued openness to feedback and collaboration. Please don't hesitate to reach out if we can assist further.

Yours sincerely,

Jane CooperDeputy CEO,
RenewableUK

Claire Mack OBE Chief Executive, Scottish Renewables

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Chris HewettChief Executive,
Solar Energy UK

Rachel Hayes
Associate
Director, Regen
Director,
Electricity
Storage Network