

ESO Draft Forward Plan

Response on behalf of the Solar Trade Association

About us

Since 1978, the Solar Trade Association (STA) has worked to promote the benefits of solar energy and to make its adoption easy and profitable for domestic and commercial users.

A not-for-profit association, we are funded entirely by our membership, which includes installers, manufacturers, distributors, large scale developers, investors and law firms.

Our mission is to empower the UK solar transformation. We are paving the way for solar to deliver the maximum possible share of UK energy by 2030 by enabling a bigger and better solar industry. We represent both solar heat and power, and have a proven track record of winning breakthroughs for solar PV and solar thermal.

Respondent details

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Would you like this response to remain confidential?	No

Thank you for the opportunity to comment on the ESO Draft Forward Plan 2019 – 21. We strongly support the following ESO objectives:

- **Improving transparency and real-time data visibility:** We concur with the view that provision of more data and information will lower bills through greater market participation and competitiveness, and strongly support making channels for sharing data with market participants clearer and more accessible, for example through a data portal.

However, given the rapidly emerging challenges of tracking solar PV capacity and estimating generation in the post-subsidy era, it is extremely urgent for our sector that this data is that it be presented as part of a broader coordinated cross-industry approach. We trust that efforts toward improving data completeness and visibility are being coordinated with the Energy Catapult-led Energy Data Taskforce, including the ongoing work undertaken as part of the [Energy Networks Association \(ENA\)'s Open Networks Product 8: System Wide Resource Register](#).

- **Improving forecasting of both demand and weather-dependent renewables' output:** Improving the accuracy of these forecasts will substantially reduce balancing costs and lead to more efficient decision making by all parties, ultimately leading to lower consumer bills and lower carbon intensity of generation.

Again, achieving this objective is inextricably linked with the need to improve tracking of PV deployment post-subsidy, which underscores the critical importance of coordinating with BEIS, ENA, Ofgem and other parties on determining how this will be done. Efficient and effective grid integration of solar PV generation depends entirely on visibility of PV generation capacity.

- **Regional Development Programs focusing on facilitating more and quicker connections for DER in regions with high levels of solar and wind resources:** Our members have consistently told us that despite the instability and uncertainty of the overarching policy environment, the most significant impediment to the further deployment of renewables in GB is in fact the lack of affordable distribution grid connections. These costs are currently at least 10% of the total capital cost for new large-scale groundmount PV developments, and will only increase as a proportion of total costs. In many areas, the time, cost and complexity of obtaining a connection offer are simply uneconomic, even if a suitable connection is in fact available.

In addition to reinforcing and building upon existing infrastructure, which we emphasise remains a high priority, and making more effective use of flexibility services in the regions identified, we would also urge the ESO to collaborate with the DNOs where possible in improving the quality, comprehensiveness and accessibility of grid congestion data. By identifying areas where connections may be available in these highly congested areas, for example through detailed and timely Heat Maps, this will significantly improve the application process for our members and could substantially accelerate DER connections whilst avoiding additional costs for network operators.

- **Considering solar's potential contribution to system restoration (Black Start):** Alternative Approaches to Restoration and an opening of Black Start procurement to a wider range of participants are important work streams and an appropriate recognition of the role of solar PV and battery storage in supporting a reliable and resilient energy system. We would be happy to support the development of this Product Roadmap and to contribute evidence from our solar and storage members.
- **Improving access to the Balancing Mechanism and enabling greater participation of intermittent generation in ancillary/balancing services markets:** Again, we support these objectives and would be eager to provide evidence from our members in support of these work streams.