

10 July 2026

East Park Energy: implications of Gate 1 BESS connection status for claimed benefits, available evidence, and the Scheme under Examination

Submission: Applicant's Response to Deadline 2 Submissions – Other Interested Parties/Post-hearing submission relating to Issue-Specific Hearing 4 on BESS

Stop East Park Energy (SEPE) is an independent, community-led group established in response to concerns over the proposed East Park Energy development. The group operates on an unfunded, voluntary basis and has over 1,000 registered supporters. SEPE includes individuals with professional expertise in agriculture, analysis, civil engineering, construction, ecology and environmental science, energy, finance, law and planning, as well as professional experience with the NSIP process.

• This submission incorporates input and review from professionals with expertise in the renewable energy and wider energy sectors

This submission:

1. Establishes a material discrepancy between the Application and the available evidence, including project-specific evidence submitted by National Grid Electricity Transmission at Deadline 1 confirming that the Applicant has not secured a grid connection offer for its Battery Energy Storage System (BESS), which has been assigned 'Gate 1' status.
2. Demonstrates that without its own grid connection, the BESS does not have the import capability necessary to deliver all claimed benefits, and explains why Gate 1 status creates uncertainty over the operational capabilities it will ultimately be able to provide.
3. Cites evidence from National Grid, NESO, DESNZ/Ofgem, sector analysis and commentary and Brockwell Energy Group demonstrating that Gate 1 projects are not assured progression to Gate 2, specifically against a backdrop of substantial battery pipeline over-subscription.
4. Identifies that the Application continues to rely on specific BESS capabilities not evidenced as secured, and suggests that the operational role now advanced for the BESS differs materially from that described in the

Application, which has not been changed to reflect the Applicant's evolving position following the introduction of Gate status into the Examination.

5. Establishes that NESO's decisions and guidance treat the East Park Energy solar generating station and BESS as separate assets.
6. Highlights evidence, including sector analysis, sector commentary and Brockwell Energy's disclosure of Gate 1 risks, indicating that the original BESS operating model was expected to make a contribution to the Scheme's viability and claimed benefits, rather than serving only a limited supporting role, as now suggested by the Applicant.
7. Identifies a specific evidential gap arising from the absence of key connection and operational information needed to verify the deliverability of the claimed BESS benefits, including the absence of evidence substantiating the Applicant's asserted "Gate 2 offer" despite the Examining Authority's Q1.1.20 request.
8. Concludes that the current connection position, together with the Applicant's evolving description of the BESS, creates a substantive inconsistency between the Scheme described in the Application and that now being advanced during the Examination, raising uncertainty as to whether the project under examination corresponds in all material respects with that for which development consent was originally sought, and requiring caution when attributing weight to the claimed BESS benefits.

Note: this submission should be read alongside earlier SEPE submissions addressing wider issues relating to the import functionality of BESS, REP3-108 and REP1-156.

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1. Introduction: connection status, the role of the BESS and a discrepancy between the Application and the Scheme under Examination

This submission addresses a material discrepancy that emerged at the outset of the Examination of the East Park Energy NSIP application.

The Scheme has been promoted, and is currently being examined, as an integrated solar generation and energy storage development. The proposed 100MW Battery Energy Storage System (BESS), featuring explicit import/export capabilities, is relied on in the Application to deliver benefits described as energy security, grid balancing, flexibility and reliability, as well as the mitigation of solar intermittency. The Applicant states that the project will enhance energy security by acting as a “flexible energy hub” that balances supply and demand through on-site battery storage. The BESS is presented as a substantive part of the Applicant’s case for development consent.

However, evidence submitted by National Grid Electricity Transmission (NGET) at Deadline 1 confirmed that, while the solar generation element has secured Gate 2 grid connection status under the National Energy System Operator’s (NESO’s) Connections Reform, the BESS has been allocated only Gate 1 status. At Gate 1, the East Park Energy BESS does not yet have a grid connection offer, is not in the grid connection queue, does not have protected status and has no guarantee of progressing to Gate 2.

This is not a minor technical or timing matter. Without the necessary grid connection offer or rights, including import capabilities, the BESS cannot deliver several of the claimed benefits relied on by the Applicant.

Put simply, although a BESS can operate in a much more limited manner using a solar connection, without a Gate 2 import/export connection it cannot charge directly from the grid and store electricity from wider grid sources, ready to discharge that electricity back to the grid later when demand rises. Despite the framing of recent responses from the Applicant, the BESS is therefore unable to provide the wider grid balancing services associated with year-round energy security. It will also not be able to participate in energy arbitrage which, as set out in this submission, together with grid services, is seen by the sector as an essential feature of commercial utility-scale energy storage systems.

With significantly less scope for energy storage outside peak solar generation periods – when demand is lower and the need for additional stored generation is consequently reduced – the policy support on which the Applicant relies under National Policy Statements for Renewable Energy Infrastructure EN-1 and EN-3 is therefore correspondingly weakened.

SEPE suggests that NGET's evidence raises important questions for the Examination:

- Does the Application reflect the current connection position?
- Is the Scheme currently under examination as described in the Application?
- Does the Application that was submitted on 3 October 2025 describe fundamental functionality aspects of the Scheme before the Examination today?
- Do the claimed benefits attributed to the BESS remain evidenced?
- In light of the extensive range of evidence presented in this submission, should greater caution be exercised when weighing claimed benefits in the planning balance?

This submission also raises wider questions regarding the Applicant's approach to transparency concerning information relating to grid connection status and its repercussions for the Application. SEPE identified this as a concern in its Deadline 3 submission (REP3-108), indicating evidence of ambiguity over a number of references the Applicant made to receiving a "Gate 2" offer post the NESO connection reform process in its response to SEPE (REP2-045). The timeline in Appendix A provides relevant context.

1.1 Background and context to the Applicant's response to the introduction of Gate status into the Examination

This submission starts by setting out the National Grid evidence and how the Scheme's connection status was introduced as a potential issue for consideration into the Examination, before covering relevant aspects of NESO's grid connection reform process, how connection reform has been received within both the broader sector and by the Applicant's corporate group, and analysis demonstrating how solar/battery hybrids are anticipated to function given the business case for operating in the UK energy market. This is in order to contextualise the Applicant's now evolving reframing of its grid connection position and its original apparent reluctance to acknowledge the Gate status of the Scheme's two distinct components.

2. National Grid evidence and the Applicant's Deadline 2 response

The most important project-specific evidence on the issue before the Examination comes from NGET.

In its Written Representation, submitted at Deadline 1 on 7 April 2026 (REP1-080), NGET states:

"Under the Connections Reform process, connections which are ready and satisfy the requirements for strategic alignment are prioritised. Customer

applications will be assigned as either a “Gate 1” project, or as a “Gate 2” project, based on whether they meet the necessary criteria.

Where a project is designated as “Gate 2”, these are projects which are ready for connection. Where a project is designated as “Gate 1”, these projects are deemed as not ready and the customer will need to reapply in the future in order to obtain a “Gate 2” offer. We note that the Promoter has received a Gate 2 offer for its connection for the solar farm only, with a Gate 1 offer for the battery connection. As such, NGET are only in a position to progress the designs for the solar connection under the Gate 2 offer at this stage.”

That statement confirms not only that the solar generating station and battery component are not presently progressing through the connections process on the same basis, but that NGET is currently progressing design work only for the solar connection.

The significance of NGET’s representation is not simply that the connection positions materially differ, but that it raises a legitimate question as to whether the operational assumptions and benefits attributed to the BESS remain justified under the current connection position.

SEPE notes that in its response to the NGET representation (REP2-044), the Applicant does not acknowledge or address NGET’s Gate 2/Gate 1 distinction for the “solar farm” and “battery connection”, stating only:

“The Applicant can confirm that the Scheme received a ‘Gate 2’ offer with a connection date of October 2028, with an October 2030 backstop.”

3. The introduction of the Scheme’s connection status into the Examination at Deadline 2 and the Applicant’s initial response to issues raised

Connection status was first addressed in an Interested Party Deadline 2 submission (REP2-063), responding to NGET’s representation and identifying issues arising from the BESS Gate 1 position.

A SEPE submission in relation to the NGET submission was made at Deadline 3. SEPE awaits a response.

The Applicant’s response to REP2-063 (REP3-074) does not directly engage with the central issue it sets out. Instead, it seeks to frame this distinction as having limited consequence because the BESS can effectively ‘sit behind’ the solar connection:

“...with stored solar electricity capable of being exported through the Gate 2 solar generation connection offer”.

However, the fact that a BESS may physically sit behind the solar connection does not address the central question raised by NGET's evidence: whether the Examination has been provided with sufficient evidence to determine the extent to which the connection rights, import capability and operational permissions necessary to perform the role claimed for the BESS in the Application are secured under the current connection arrangements.

In effect, the Applicant's response to both REP2-063 in May (REP3-074), and at the later BESS issue-specific hearing in June, asks the Examination to accept that because the BESS may now sit behind the solar connection and charge only from on-site solar generation, no material reassessment of the operational assumptions underpinning the BESS is required. SEPE contends that the evidence presently before the Examination and set out in this submission does not support that conclusion.

The Applicant's evolving characterisation of the role of the BESS is set out in more detail in section 8.

4. NESO's Connections Reform: the significance of Gate 1 status

SEPE suggests that the Applicant has sought to minimise the significance of the Scheme's current grid connection position during much of the Examination. There is evidence across the Examination of the Applicant referring obliquely or ambiguously to Gate status for the Scheme, for example, its response to the NGET Written Representation, as set out in section 2, or its response to Examining Authority question Q1.1.20 on its connection offer, set out in section 9. Connection status and the important distinction between 'Gate 1' and 'Gate 2' has only become a 'live' Examination topic some months into the Examination, and following Interested Party submissions.

SEPE suggests it is important therefore to explore the ramifications of Gate status, specifically Gate 1, starting with the national system operator in this section, and then moving to a key DEZNZ/Ofgem communication on the issue and wider sector perceptions in section 5.

According to NESO:

"Gate 1 refers to projects that do not meet the criteria for Gate 2 under the reformed connections process. These projects receive a Gate 1 offer or have the option to terminate their connection request.

Key Points:

- **No Confirmed Connection Date: Gate 1 projects do not receive a confirmed connection date.**
- **No Place in Queue: They do not reserve capacity, a place in the queue, or provide protected status.**
- **No Guarantee of Connection: There is no guarantee of a connection.**
- **Future Application Required: To progress, customers must reapply in a future application window and meet the criteria for Gate 2.**
- **Termination Option: Customers can choose to terminate their project, in which case cancellation charges will be waived, and any securities will be refunded.**
- **Embedded Customers: For embedded customers, there will be a return of any unspent project funds held by the Distribution Network Operator (DNO).**
- **Risk of Further Work: Any further work undertaken carries significant risk, as there is no guarantee of a connection.**
- **Hybrid Projects: For hybrid projects, only the works and studies associated with the Gate 2 component will continue.**
- **Agreement to Vary (ATV): If customers do not sign their Gate 1 ATV, it will be signed on their behalf when the deadline elapses.**
- **Appeals: If an appeal is submitted, all works associated with the project will remain on hold while the appeal is being considered.”**

[Emphasis added]

SEPE notes that NESO specifically refers to hybrid projects such as East Park Energy, making it clear that:

“only the works and studies associated with the Gate 2 component will continue”.

In a NESO webinar in December 2025, coinciding with the release of the Connections Reform queue outcomes, NESO Chief Operating Officer Kayte O’Neill warned:

“Only protected batteries were prioritised – 83 GW. The oversupply of Batteries by 2035 is 62 GW”

“Some hybrid/co-located projects will have some of their technologies prioritised and some of their technologies not prioritised in line with the methodology”

She commented during the webinar:

“There will be disappointment, we do understand that whichever way this goes these decisions affect businesses and people’s work. The outcomes today are underpinned by very robust internal and external assurance processes.”

SEPE notes that following Connections Reform, and in line with the above, NESO’s decision to offer Gate 2 status to the solar generating station while allocating only Gate 1 status to the BESS suggests that the national system operator itself regards East Park’s solar generating station and BESS as distinct assets rather than a single inseparable development. NESO’s guidance on co-located assets similarly recognises solar generation and battery storage as operationally separate technologies requiring separate registration, metering and operational arrangements (see section 8.1.1). The fact that the two elements of the Scheme have been assessed differently for connection purposes is therefore relevant when considering whether the benefits attributed to the BESS can simply be assumed to arise from the existence of a Gate 2 solar connection, or whether those benefits can properly be relied on in the absence of a Gate 2 import/export connection for the BESS itself.

5. Further evidence that progression to Gate 2 is uncertain for both battery projects and battery storage at hybrid projects

As set out in the previous section, NESO, the energy system operator, makes clear that Gate 1 status under Connections Reform provides no guaranteed connection, queue position, protected status, or reserved capacity, meaning any further work undertaken carries significant risk. For hybrid projects with mixed Gate status, only the works and studies associated with the Gate 2 component will continue.

This lack of certainty is reinforced by subsequent statements from government, the regulator, industry commentators and the Applicant’s own corporate group, all of which recognise the risks and uncertainties associated with projects that remain at Gate 1.

5.1 DESNZ/Ofgem open letter

The April 2026 DESNZ and Ofgem open letter on Connections Reform focuses on issues in relation to the substantial “battery connection surplus” for both the 2030 and 2035 targets. It states:

“The queue formation outcomes also highlight emerging risks for certain technologies, in particular, a high volume of battery storage projects ... there is still 14.8 GW above the top of the Action Plan battery capacity range for 2030 and 61.7 GW above the projected battery system need in 2035.”

In light of this very significant battery capacity over-subscription, the letter stresses the importance of ensuring that:

“non-viable projects leave the queue before the network companies have committed significant capital expenditure”.

As the government and the regulator make clear, progression from Gate 1 to Gate 2 for battery storage projects cannot simply be assumed.

5.2 Industry commentary

The significance of this issue was highlighted during a January 2026 webinar hosted by the specialist renewable energy news platform *Solar Power Portal*, which examined the practical implications of Connections Reform for co-located solar generation and battery storage developments. Industry specialists discussed the:

“high level of confusion” it had prompted in the sector, causing “frustration in the developer ... and investment community”.

Analyst Josh Cornes commented:

“There are a lot of projects that are unfeasible without both solar and BESS ... and because NESO haven’t looked at them as one project; they’ve looked at them as two different things, they’ve given Gate 1s to mainly BESS and Gate 2 to the solar side of things, but obviously without the BESS, the solar can’t be built ... these projects just aren’t feasible without both technologies.”

Other sector commentary reinforces the sense of confusion, uncertainty and investment risk arising from the treatment of both battery and hybrid projects within the Gate 2 assessment framework.

For example, Osborne Clarke LLP commented in December 2025:

“... [projects] meeting the readiness and strategic alignment criteria will be prioritised and can expect to receive a “Gate 2” offer, while “Gate 1” offers will be issued to projects which are not prioritised (either as a result of failing to satisfy the Gate 2 criteria, failing to submit evidence on time, or where a project has affirmatively requested Gate 1 status). ... The results paint a varied picture for energy developers. While offshore wind and solar photovoltaic (PV) projects fared well in terms of being prioritised, over 150 GW of battery-energy-storage-system capacity has been deprioritised or removed from the connections queue due to the oversupply in specific regions and speculative applications generally.”

Sophie Linnell, Director, Infrastructure and Energy, Walker Morris LLP, wrote in December 2025:

“While the network owners assess the reformed queue and developers await their updated connection offers, decisions about ongoing project viability will have to be made based off NESO’s Gate 1 and Gate 2 notifications. ... the capacity of battery projects not prioritised comes as no surprise. ... There has also been confusion around NESO’s treatment of hybrid projects. ... Where seeking lender investment, lenders may require sight of the full offer before entering into discussions.”

Flora Harley, Partner, Head of Energy and Sustainability Research at Knight Frank LLP, wrote in December 2025:

“NESO’s Gate 2 outcome marks a structural shift in grid access, reducing oversubscription and defining a phased pipeline to 2035. ... battery projects were significantly cut and remain over target capacity ranges. ... The key takeaway being that most of the CP30 capacity is met by 2035 across all technologies, except for batteries which are ‘significantly oversupplied’. ... there has been a move to cut hybrid battery storage alongside proposed solar farms to curtail overcapacity.”

Burges Salmon LLP, acting for the Applicant, has also written more broadly on Connections Reform, for example, in October 2025 commenting on applicants waiting for NESO confirmation of Gate 1 and Gate 2 offers, referring to “industry uncertainty and frustration” and characterising Gate 1 offer phases (Q4 2025, Q1 2026) as follows:

“Gate 1 offers issued for (i) self-declared projects; (ii) projects that failed to submit an application; and (iii) projects that failed initial checks.”

“Gate 1 offers for projects failing detailed checks or strategic alignment.”

5.3 Brockwell Energy disclosures

The Applicant’s characterisation of the BESS Gate 1 status as a relatively minor, temporary or even procedural matter, as set out in section 8, is difficult to reconcile with the assessment of risk contained within its corporate group’s financial reporting. SEPE notes that Brockwell Energy Group Limited expressly recognises and discloses risks associated with Gate 1 status in its audited Accounts for the year ended 31 March 2025, filed on 30 April 2026. The Accounts include the following statement in the Directors’ Report:

“During the year, Ofgem launched a consultation process proposing new rules to tackle the grid connection backlog, including prioritising projects based on readiness and system need. These proposals evolved into the “first-ready, first-connected” model and the gate-based queue structure which was subsequently approved in April 2025 and became collectively known as the “TMO4+” reforms. **Under the revised framework, projects are awarded Gate 1 status where they remain in the queue but without firm connection rights**, while only projects that demonstrate sufficient maturity (such as planning progress and deliverability) are promoted to Gate 2, where they receive confirmed connection dates and capacity. Subsequent to the balance sheet date, **the Group received the initial results under the TMO4+ review process which confirmed Gate 1 status for several of its projects**. The Group is in the process of analysing the results of the initial application process on its prospective projects and the wider UK energy market, together with potential scope for securing the Gate 2 status in the future application rounds. Nevertheless, as set out in note 12 to the financial statements, **the directors acknowledge that the results of the TMO4+ reforms may impact on the recoverable amounts of the Group’s Assets in the course of construction recognised in relation to some of its projects.**”

Note 12 states:

“Assets in the course of construction comprise development, planning and construction costs directly attributable to the development of energy projects. Included within the balance is £2,540,000 in relation to projects at an early stage of the development. Following the initial results under the TMO4+ review which were published subsequent to the year-end, **the directors consider that the book value of the Assets in the course of construction held in relation to these projects is at risk of future impairment due to the projects not securing the Gate 2 protected status** as part of the initial evidence submission process.”

[Emphasis added]

While these comments relate to Brockwell Energy Group’s project portfolio generally rather than the Scheme specifically, and may include stand-alone proposals as well as hybrid schemes, they demonstrate that the group responsible for developing the Scheme itself recognises that projects remaining at Gate 1 face a material risk of failing to secure Gate 2 status, with consequent implications for project viability and asset value. These risks were considered sufficiently material to warrant disclosure in Brockwell Energy Group’s audited Accounts. The disclosure itself reflects the uncertainty associated with obtaining Gate 2 connections under the reformed grid

connection regime and acknowledges that the outcome of the TMO4+ review process may affect the recoverable value of project assets.

Notwithstanding all the above, as set out in section 8, the Applicant states in its response to REP2-063:

“...the absence of a Gate 2 import offer for the BESS at this point in time does not make the BESS or solar development undeliverable. At most, it relates to the timing and extent of the BESS’s ability to provide grid import and balancing services.”

The use of the phrases “at this point in time” and “at most” implies that the issue is merely one of timing. The evidence cited in this section indicates that progression from Gate 1 to Gate 2 cannot be assumed and that some projects may never secure Gate 2 status. Yet no supporting evidence has been provided to demonstrate why the Applicant’s conclusion should be accepted in the specific circumstances of East Park.

6. Solar-only operation and the wider role of utility-scale BESS

As SEPE sets out in this submission, the Applicant’s responses take the line that the BESS can now be regarded as a straightforward storage asset associated with the solar generating station, and that is its “core” function. However, evidence regarding the operation of UK utility-scale battery storage suggests that this may not reflect the role such assets are ordinarily expected to perform.

Analysis of the business case for the grid-scale solar and battery sector by renewable energy policy academic Professor Tony Day suggests that:

“avoiding [solar power] curtailment alone does not justify the cost of batteries”

“using batteries solely to limit summer curtailment delivers weak financial returns”.

The analysis concludes that:

“the real commercial value will lie in providing ‘grid services’ and enabling energy arbitrage”

“Import and export capability is essential to access these revenue streams.”

The significance of those observations is not simply commercial. They provide insight into how utility-scale battery assets are anticipated to operate in practice. If import capability, grid balancing services and energy arbitrage form a significant part of

expected BESS operation, SEPE suggests the Examination should understand whether those capabilities remain available under the current connection position.

Those observations are particularly relevant in the context of UK solar generation patterns.

According to data from the Department for Energy Security and Net Zero, generation from UK solar installations is heavily concentrated in spring and summer. During prolonged autumn and winter periods, generation falls substantially and may remain low for extended periods. A BESS operating predominantly as a storage device for contemporaneous solar generation is likely therefore to face lengthy periods in which charging opportunities are limited. SEPE has already provided to the Examination regional and local evidence on insolation data, demonstrating both modest capacity factors and significant seasonal variation (see Appendix B).

In practice, as Day's analysis concludes, the operation of large-scale co-located UK battery storage is likely to depend on the ability to import electricity from the grid, participate in balancing and ancillary-service markets, and undertake energy arbitrage by charging and discharging in response to market conditions throughout the year.

Viewed alongside the evidence set out regarding the widely articulated risks and uncertainties associated with Gate 1 outcomes and Brockwell Energy Group's disclosure of Gate 1-related risks (section 5), these observations are instructive. If, as the Applicant now suggests, the principal role of a co-located BESS is simply to store any surplus solar generation and reduce spring or summer curtailment, it is difficult to explain either the level of concern reflected in the industry evidence or Brockwell's treatment of Gate 1 outcomes as a material risk. Rather, the evidence points towards a broader recognition that solar generation alone may not provide the full operational and commercial case for such developments, particularly given the modest capacity factors and pronounced seasonal variability of UK solar generation.

Taken together, the evidence suggests that a substantial part of the anticipated value of utility-scale BESS lies in wider grid participation, balancing services and energy arbitrage, all of which depend on capabilities extending beyond solar-only storage. SEPE's earlier submissions REP1-156 (specifically sections 10.2.3, 15.5, 18.4.1, 18.4.3, 21.1, 21.11 and Appendix E) and REP3-108 (sections 2.1 and 2.2) are relevant here.

The issue for the Examination is not whether those activities are commercially attractive. Rather, it is whether the operational assumptions and claimed benefits relating to balancing services and wider grid interaction relied on by the Applicant,

but now described as “supplementary”, remain justified under the current connection position.

7. Connection assumptions underpinning the Application’s claimed BESS benefits

SEPE notes that a 100MW BESS import capability still remains embedded within relevant Application documents despite the evidence provided by NGET indicating that the current connection arrangement does not permit import from the transmission network.

A recurring feature of the current Application documents is that the claimed benefits of the BESS are presented on the basis that the battery will possess wider import and export functionality and will be capable of participating in broader flexibility, balancing and energy security functions. Notwithstanding the Applicant’s current attempts in response to Interested Party representations to accommodate the unguaranteed connection status and reframe the role of the BESS, the Application does not present the BESS as a simple storage asset charged solely from contemporaneous solar generation. The following examples from the Application illustrate how the assessment of benefits relies on capabilities that appear to extend beyond straightforward on-site solar-only storage and export.

The Applicant’s Policy Compliance Document (current version: P02, April 2026) specifies the BESS’s availability for “grid-balancing services” and states on page 10:

“By importing excess electricity from the grid and storing it, the BESS would be capable of capturing electricity that would otherwise be lost / unutilised...”

It further states that the BESS could be used to bridge gaps in production and avoid “potential blackouts”. SEPE addresses this in more detail in section 8.4.1.

In Environmental Statement Volume 1 – Main Report, Chapter 1: Introduction (current version: P01, September 2025), paragraph 1.2.2 states:

“The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS. The precise generating capacity and storage capacity will be subject to detailed design, but it should be noted that the Applicant presently has a grid connection agreement with National Grid for 400 MW export and 100 MW import.”

In Chapter 2: The Scheme (current version P03, May 2026), paragraph 2.1.3 states:

“The Scheme would allow for the generation and export of 400 MW of electricity to the National Grid from the solar photovoltaic energy generating station, and would be capable of exporting and importing up to 100 MW via the BESS.”

Paragraph 1.2.2 of the Planning Statement (current version: P01, September 2025) states that:

“the Applicant has a grid connection agreement with National Grid for 400 MW export and 100 MW import.”

These references expressly identify a substantial “import” capability as part of the Scheme. The wider benefits subsequently attributed to the BESS appear to rely on that capability.

At Planning Statement paragraph 2.4.22, the Applicant states:

“the Scheme will function not just as a generation asset but as a flexible energy hub that helps balance supply and demand locally”.

Similarly, the Applicant’s Statement of Reasons (current version: P03, May 2026) attributes wider system-level benefits to the BESS that imply a broader operational role. At paragraph 4.3.9, the document states that:

“battery storage ensures grid stability and reliability”

At paragraph 4.3.10 it suggests that East Park will support energy security by:

“providing on-site battery storage to balance supply and demand”.

Similarly, at paragraph 4.4.4 the Applicant claims that the Scheme will:

“enhance energy security by acting as a flexible energy hub that helps balance supply and demand locally through the use of on-site battery storage”.

These claimed benefits – flexibility, grid stability, reliability, energy security, balancing supply and demand, and even avoiding “potential blackouts” – are all typically associated with the wider import/export and grid-balancing capabilities of a utility-scale BESS. They are not associated with the storage and later export of contemporaneous solar generation alone.

Given the inherent seasonal and diurnal variability of solar generation, such claimed benefits are self-evidently more consistent with a BESS possessing wider grid import and export functionality than with simple storage of any surplus solar generation. The terms in which these benefits are described plainly suggest that the Application was originally prepared on the basis that the BESS would have full grid import and export functionality.

When considering the content of the Application, and details relating to the dual functionality of the BESS, including explicit references to “100 MW import” capability, SEPE suggests that the chronology of events set out in Appendix A is relevant. NESO began issuing the long-anticipated Connections Reform Gate determinations in December 2025, several months before the Examination commenced and well before NGET’s Written Representation introduced the new BESS Gate 1 status evidence into the Examination in April 2026. Against that background, the Examination may wish to consider the extent to which the Application documents and the claimed BESS benefits reflect the connection position known to the Applicant during that period.

8. The Applicant’s new and evolving characterisation of the BESS

A central difficulty with the Applicant’s presentation of the BESS is the lack of consistency across its evidence. Material discrepancies are apparent between the description of the BESS in the Application (see section 7), the Applicant’s response to REP2-063 at Deadline 3 in May, and the presentation and response it provided at Issue-Specific Hearing 4 on Battery Energy Storage Systems in June. Taken together, these documents and statements provide differing characterisations of the BESS, suggesting a series of reactive shifts in emphasis rather than a clear and consistent explanation of the BESS’s purpose and operation:

- The Application describes the Scheme as a “flexible energy hub” with the import/export BESS providing flexibility and reliability and supporting grid stability and energy security through balancing supply and demand.
- The Applicant’s response to REP2-063 at Deadline 3 implied that the absence of a grid connection for the BESS is not an issue, and that it can now use the solar export connection and fulfil its “primary function” as storage for solar-generated electricity.
- The Applicant’s presentation and response at ISH4 build on this new description, with its response going further, now portraying the BESS as a storage facility for on-site surplus solar generation while simultaneously referring to and relying on the “flexibility and grid balancing” that utility-scale battery storage is commonly claimed to provide.

In reality, however, by now appearing to seek to reduce the significance of the Gate 1 issue, the Applicant has recast the BESS as little more than a storage device for on-site solar, thereby narrowing its functional role from that of a more broadly deployed storage asset.

8.1 Deadline 3 response

In its first reaction to the introduction of the BESS's connection status into the Examination as an issue, the Applicant's response to REP2-063 at Deadline 3 (REP3-074) seeks to reframe the role of the BESS, while claiming that stored solar electricity is "capable" of being exported under the Scheme's solar connection offer.

It asserts that its Gate 1 position:

"...does not determine whether the BESS can be consented, constructed, charged from the Scheme's solar generation, or used to export stored solar electricity under the Scheme's solar generation connection offer."

It adds that:

"The BESS remains viable as temporary storage for the Scheme's solar generation, with stored solar electricity capable of being exported through the Gate 2 solar generation connection offer."

Alongside this the Applicant states:

"The primary function of the BESS is as an integral element of the Scheme, storing electricity generated by the solar PV modules"

The response contains important acknowledgements, appearing to accept that the Gate 1 status limits the BESS's ability to undertake broader grid-balancing activities via import functionality:

"The Gate 1 position relates to the BESS's separate ability to import electricity from the grid for wider grid-balancing services."

"[The BESS's] additional role in importing excess electricity from the grid and providing grid-balancing services is supplementary to that core co-located storage function."

Taken together, the Applicant's statements at that stage can be understood as an attempt to accommodate the connection position set out by NGET and now questioned by Interested Parties. The Applicant's response at Deadline 3 seems to suggest that the Scheme can continue substantially as proposed notwithstanding the

BESS's Gate 1 status. It now describes the BESS's "primary function" as being the storage of on-site solar.

A further difficulty with the Applicant's position is that it currently seeks to characterise the present connection position as little more than a technical distinction because the BESS can continue to sit behind the solar connection. However, the wider technical evidence suggests that the operational role of a utility-scale BESS, and the extent of the benefits that may be attributed to it, are not necessarily as straightforward as that characterisation implies.

8.1.1 NESO and ENA guidance

NESO has already treated the solar generating station and BESS as separate assets through their differing Gate status. Relevant NESO and ENA guidance provides further context as to why that distinction may be operationally significant.

NESO guidance recognises that co-located solar generation and battery storage assets may operate behind a shared grid entry point. However, the guidance also treats the two technologies as operationally distinct assets, requiring providers to "register each technology as individual BMU [Balancing Mechanism Unit]", with dedicated operational metering and separate Physical Notifications, Bid-Offer Acceptances and data submission arrangements.

Importantly, the guidance expressly contemplates operating modes including:

"BESS importing only"; "BESS exporting only"; and "PV and grid charging BESS".

It further states that:

"the PV could be switched off and the BESS would import from the grid".

The significance of this guidance is not that the East Park BESS must necessarily operate in those ways. Rather, it demonstrates that independent import and export activity is a recognised and anticipated function of utility-scale battery storage, even where the battery is co-located with solar generation. It also illustrates that the relationship between a solar generating station and a co-located BESS may involve a range of operational arrangements beyond the simple storage of contemporaneous solar generation.

The wider ENA Electricity Storage Guide similarly recognises that storage assets possess materially different network characteristics from solar PV because they may require both import and export capability and can create different network impacts.

Taken together, this evidence indicates that the fact that a BESS is located behind a solar connection does not, by itself, demonstrate the extent of the operational rights, capabilities or services that the BESS is able to provide. Nor does it establish that the full range of benefits attributed to a utility-scale BESS are necessarily available under a particular connection arrangement.

Accordingly, the issue for the Examination is not whether the East Park BESS can physically sit behind the solar connection. Rather, it is whether the specific connection arrangements presently available to the BESS secure the operational capabilities necessary to support the flexibility, balancing, energy security and other claimed benefits attributed to it elsewhere in the Application.

8.2 ISH4 presentation and response: solar-only operation and the Applicant's claimed "flexibility" benefits

At Issue-Specific Hearing 4 on Battery Energy Storage Systems on 9 June, the Applicant appeared to reflect but then revisit its initial reframing of the role of the BESS, described earlier in this section. SEPE suggests that the Applicant's remarks and responses at ISH4 reinforce concerns about the consistency of its position on the role and purpose of the BESS, specifically relating to grid balancing capabilities.

SEPE notes that the Applicant's comments at ISH4 appear to seek to minimise the significance of Gate 2 status: "the principal function of the BESS as part of the Scheme remains wholly unaffected by the recent grid connection reform"; "the gate 1 position *only* relates to BESS's ability to import electricity from the grid for wider grid-balancing services"; "the Gate 2 offer only relates to...".

A consultant acting for the Applicant stated in his initial presentation:

"It's important to note that the principal function of the BESS as part of the Scheme remains wholly unaffected by the recent grid connection reform implemented by the national energy system operator, NESO. ... Gate 1 applies to projects that do not yet meet the full Gate 2 criteria. These projects may retain a route to progress but do not receive a confirmed connection date, connection point or queue position ... The BESS proposed in connection with the Scheme has been afforded a Gate 1 status by NESO. As such it is not currently assigned a confirmed connection date but may progress through future windows where readiness is demonstrated. However it must be emphasised that the gate 1 position *only* relates to BESS's ability to import electricity from the grid for wider grid-balancing services. It doesn't affect whether the BESS can be charged from the Scheme's solar generation and then used to export stored solar electricity under the Scheme's solar generation connection offer. In short, the absence of a Gate 2 import offer does not affect the primary function of the BESS, supporting more efficient

flexible energy generation, or make its inclusion in the Scheme unviable or redundant in any way. It merely affects the timing and extent of the BESS's ability to provide grid import and balancing services at some point in the future."

SEPE notes that the repeated reference to "timing and extent" (see REP3-074) suggests once more that future functionality is assumed to be achievable, with only the schedule and an undefined scale of delivery remaining uncertain, contrary to the wider evidence set out in sections 4 and 5 of this submission.

Despite referring in his ISH4 presentation to the provision of "grid import and balancing services at some point in the future" – hence conceding that 'balancing services' are not, in fact, available under current connection arrangements – in a response to a representation from an Interested Party, the consultant acting for the Applicant at ISH4 then went on to claim what he referred to as "flexibility and grid balancing" functionality for a BESS operating under a solar export-only connection:

"The BESS is there to support the solar generation as ancillary infrastructure, aiding it in delivering the national need that's set out in NPS EN-3. It's acting as a flexible supporting infrastructure for the delivery of the solar generation so it captures any excess and then will allow more efficiently that solar generation to be distributed to the grid. The distinction being that the Gate 2 offer only relates to it accepting electricity from the grid to be stored to then be released at another time. The primary function of it and the function that's supported in NPS EN-1 is for that flexibility and grid balancing."

This response, less scripted, appears to attempt to combine two distinct propositions. First, it presents the BESS as a relatively limited "ancillary" facility whose principal purpose is to capture "any excess" solar generation and export it later. Secondly, it continues to attribute to the BESS "flexibility and grid-balancing" functions, notwithstanding its now-confirmed lack of import functionality.

Notably, the Applicant's second ISH4 statement somewhat contradicts the position previously set out by the Applicant in REP3-074. To recap, its Deadline 3 response explicitly refers to the BESS's inability to provide "separate" or "supplementary" "grid-balancing" while operating without an import connection offer:

"The Gate 1 position relates to the BESS's separate ability to import electricity from the grid for wider grid-balancing services."

"...additional role in importing excess electricity from the grid and providing grid-balancing services is supplementary to that core co-located storage function."

SEPE suggests that it is difficult to see how the BESS would provide “wider grid-balancing services” under Gate 2 import connection status, yet also offer substantially the same “flexibility and grid balancing” benefits without a direct grid connection and while simply storing any excess solar generation. The Applicant’s evolving case appears to rest on an attempt to maintain largely incompatible positions simultaneously, appearing to require increasingly fine distinctions in an effort to ‘square the circle’ and preserve the claimed benefits under either scenario.

In short, SEPE contends that if the “primary function” – the principal role and value of a utility-scale BESS – genuinely lay in storing any excess solar generation and releasing it later, as the Applicant now claims, the absence of independent grid-import capability would be of comparatively limited consequence. The evidence set out in section 5 suggests the opposite.

8.3 Issues associated with solar-only operation

If, as the Applicant now contends, the BESS is primarily a solar-charged storage asset operating behind the solar connection, its ability to provide what it described as “flexibility and grid balancing” at ISH4 is inherently constrained by the availability of solar generation. As SEPE sets out in this and earlier submissions, UK solar output is highly seasonal and intermittent, with extended periods during autumn and winter when generation is substantially reduced. During such periods, a BESS dependent principally on contemporaneous solar generation will have limited opportunities to charge and therefore limited ability to provide significant or sustained grid balancing services.

Moreover, any balancing benefit derived solely from storing surplus solar generation is intrinsically limited by the mismatch between the seasonal availability of solar output and the timing of system need: “any excess” solar generation is most likely to arise during higher-generation periods in spring and summer, when demand is low; the greatest balancing and flexibility requirements frequently occur when solar generation is low or entirely absent.

The scale of constraint is illustrated by the solar generation data already before the Examination. For ease of reference, SEPE reproduces the projections based on regional insolation data for 2024 and 2025 contained in its Written Representation (Appendix B), alongside average output across each 12-month cycle. Appendix B also presents similar representations based on two years of actual operational data at the Manor Farm solar site, directly adjacent to the East Park Energy site. These charts serve to demonstrate the prolonged periods during which the East Park BESS would be significantly under-utilised as an on-site solar-charging-only storage system.

The Applicant's statement at ISH4 also appears difficult to reconcile with NESO's guidance (see section 8.1.1), which recognises independent battery import and export activity, grid charging and participation in balancing arrangements as normal operating modes for utility-scale BESS. Similarly, Day's analysis, cited in section 6, suggests that the principal operational value of large-scale battery storage commonly derives from import-led grid services, balancing activities and energy arbitrage rather than solely from avoiding solar curtailment. That analysis implicitly recognises that solar generation alone is insufficient to support the full operational role commonly attributed to utility-scale BESS, and is supported by the evidence of sector reaction to hybrid project Gate outcomes set out in sections 5.2 and 5.3.

SEPE suggests that it is self-evident that if contemporaneous solar charging were 'enough', there would be little need for the import capability, balancing participation and arbitrage activities identified as essential revenue and operational streams. The evidence clearly indicates that a substantial part of the anticipated value and functionality of utility-scale BESS depends on capabilities extending beyond the storage and later export of limited surplus solar generation.

8.3.1 Operational availability and Capacity Market obligations

Participation in balancing and ancillary-service markets is not merely a matter of market opportunity. Where a battery operator contracts to provide grid services, it assumes binding contractual obligations to make energy available when instructed. Failure to deliver contracted services when instructed can result in the loss of availability and utilisation payments, imbalance charges, contractual penalties and exclusion from future procurements. Such arrangements depend on the operator's ability to maintain sufficient stored energy to meet dispatch instructions. A BESS capable of charging directly from the wider electricity system can do so whenever required; a BESS restricted to charging only from contemporaneous on-site solar generation is inherently constrained by weather, seasonality and the availability of solar output.

Without secured import capability, the BESS cannot access electricity from the wider grid and its ability to participate reliably in balancing, reserve and other ancillary-service markets is correspondingly reduced.

This raises a material evidential issue for the Examination. There is no evidence that the Applicant has identified which balancing, ancillary-service or flexibility markets the BESS could participate in under a solar-only charging arrangement, or quantified how that participation, and the resulting claimed benefits, would differ from a BESS possessing the 100MW import capability described throughout the Application.

This is not simply a commercial issue. The Applicant continues to rely on the proposed BESS as an important part of its planning case, yet SEPE has identified no

evidence that the claimed benefits have been reassessed in the Application to take account of the extensive evidence concerning the BESS's Gate 1 connection status.

8.4 The Applicant's revised BESS role and its claimed policy benefits

Against this background, SEPE suggests that it is difficult to see how the Applicant can simultaneously downgrade grid interaction to a "supplementary" function while continuing to claim policy support that depends on the very flexibility and balancing functions that wider grid interaction enables.

The Applicant appears to have over-stated policy support under the National Policy Statements for the limited role the East Park Energy BESS could play without full connection status and an ability to import electricity from the grid. While current editions of EN-1 and EN-3 provide broad, generic support for 'storage', the detailed provisions appear to favour the value of genuine flexibility and reliable grid-balancing functionality over basic curtailment management and a battery restricted to time-shifting generation from a single solar installation. As evidenced in this submission, flexibility and grid-balancing functions are most readily delivered where a BESS can interact bidirectionally with the grid through import, export and participation in full balancing arrangements.

Without its own grid connection, under EN-1 paragraph 3.3.6, the BESS could only make a limited contribution to this objective, and its ability to do so would be significantly constrained during autumn and winter seasons, when periods of high demand typically coincide with lower solar generation:

"Storage ... can also supply electricity when domestic demand is higher than generation, supporting security of supply"

Without an import connection, the East Park Energy BESS could fulfil the first function outlined in paragraph 3.3.27, but it could not fulfil the second:

"Storage can provide various services ...[including] maximising the usable output from intermittent low carbon generation (e.g. solar and wind) ... providing a range of balancing services"

The BESS would not be capable of "providing balancing services" on a consistent, reliable basis, and paragraph 3.3.28 underscores the limited nature of solar-only charging:

"Whilst important in providing balancing services, many of the storage facilities currently being deployed provide storage over a period of hours but cannot cost effectively cover prolonged periods of low output from wind and solar."

On the Applicant's own revised characterisation of the BESS, SEPE suggests that the claimed "primary function" of "flexibility and grid balancing" becomes increasingly difficult to sustain.

As set out earlier in this section, Appendix B provides projections for regional solar output, based on two years of actual insolation data, as well as projections based on two years of capacity factor data at the Manor Farm solar site, which is directly alongside the East Park Energy target site. The charts illustrate regional and local seasonal solar output extremes, and demonstrate the constraints a solar-charged, export-only East Park BESS would operate under.

Until the Applicant demonstrates the operational capabilities secured under its connection position, SEPE suggests that the Examination cannot assume that the full range of BESS flexibility and balancing benefits claimed under EN-1 and EN-3 will remain available merely because the battery is capable of storing and later exporting any excess solar-generated electricity, predominantly mismatched against seasonal supply/demand patterns.

8.4.1 The Applicant's current Statement of Compliance

In its Policy Compliance Document (current version: P02, April 2026), under its Statement of Compliance with EN-1, the Applicant states:

"As set out in ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1], the Scheme includes a Battery Energy Storage System (BESS) with a capacity of 100 MW that would play a crucial role in enabling the Scheme to maximise its generation potential by storing excess electricity not required by the grid at times of low demand, and releasing it at times of peak demand.

In addition to its function as an essential part of the Scheme, the BESS would also be available for grid-balancing services. By importing excess electricity from the grid and storing it, the BESS would be capable of capturing electricity that would otherwise be lost / unutilised during periods when production of renewable energy exceeds demand, which is currently managed through curtailment. During situations when generating stations are interrupted, the BESS can also be used to bridge the gap in production, thus avoiding potential blackouts."

The Applicant's policy statement retains explicit and extensive references to the BESS's additional grid-balancing services, including "importing excess electricity from the grid and storing it", bridging gaps in production and "avoiding potential blackouts". SEPE also notes that the statement refers to capturing electricity that would otherwise be lost "when production of renewable energy exceeds demand".

However, the electricity grid is source-agnostic. A grid-connected BESS cannot distinguish between renewable electricity, gas-generated electricity, or electricity imported via other generation sources or interconnectors. The claim therefore overstates the extent to which charging would be limited to surplus renewable energy.

The Policy Compliance Document further states that notwithstanding the removal in 2020 of all forms of electricity storage (other than pumped hydroelectric storage) from the definition of ‘nationally significant energy generating stations’ under the Planning Act 2008, that:

“The BESS component of the Scheme is associated infrastructure to the nationally significant infrastructure comprising of a new solar electricity generating station that will provide significant benefits as part of the project set out above.”

The Applicant’s response to the question of the BESS’s status following the Infrastructure Planning (Electricity Storage Facilities) Order 2020 is to characterise the BESS as “associated infrastructure” to the “nationally significant ... solar generating station”. That characterisation is presented immediately after the Applicant’s explanation of the wider flexibility, balancing and energy security benefits said to arise from the proposed BESS, including its ability to “import[] excess electricity from the grid and stor[e] it” (quoted above). To the extent that the Applicant relies on those wider benefits in support of its characterisation of the BESS as associated infrastructure, those aspects of its justification remain subject to the uncertainties currently before the Examination.

SEPE further notes that NESO’s assessment of the Scheme does not reflect the Applicant’s characterisation of the BESS as associated infrastructure. Rather than assessing the proposed solar generating station and the BESS as a single integrated project, NESO assessed the two technologies separately and reached different conclusions in respect of each.

9. Evidential gap: the Applicant’s response to Q1.1.20 and whether the current presentation of the Scheme matches that presented in the Application

There appears to be evidential asymmetry within the Application.

The continuing absence of underlying grid connection evidence is illustrated by the Applicant’s response to the Examining Authority’s Written Question Q1.1.20, which specifically requested evidence of the asserted Gate 2 offer.

Q1.1.20 asks the Applicant:

“Grid Connection In response to National Grid’s Relevant Representation [RR-903] it is stated in the Applicant’s Responses to Relevant Representations submitted at D1 [REP1-055] that “The Applicant can confirm that the Scheme received a ‘Gate 2’ offer with a connection date of October 2028, with an October 2030 backstop.”. Please supply evidence of the offer and agreement.”

In its response (REP3-072), the Applicant starts by stating:

“The Applicant confirms that it has received a Gate 2 offer. National Grid’s Relevant Representation [RR-903] confirms that “The Project proposes the installation of solar photovoltaic panels and electrical energy storage technology, and associated infrastructure, connecting into the existing Eaton Socon 400 kV substation.””

SEPE notes that there is a subtle but significant difference between the Applicant’s references to a Gate 2 offer in its Deadline 1 and Deadline 3 responses:

“The Applicant can confirm that the Scheme received a ‘Gate 2’ offer”

“The Applicant confirms that it has received a Gate 2 offer”

Notably, this first part of the Applicant’s response to Q1.1.20 does not state that the Gate 2 offer is for the solar component only. SEPE additionally notes a level of ambiguity. There is a risk of conflation of the Applicant’s “Gate 2 offer” assertion with the direct quotation from the NGET representation, giving the impression that the latter ‘confirms’ the former. The quoted NGET excerpt (“National Grid’s Relevant Representation [RR-903] confirms that...”) simply describes the project’s originally proposed connection arrangements. The NGET Relevant Representation neither refers to Gate 2 status for the Scheme as a whole nor provides evidence of it. As a result, the Applicant’s response does not appear to address the Examining Authority’s request for evidence in a transparent or direct way.

SEPE submits that the Applicant’s brief response to Q1.1.20 does not go on to provide the “evidence of the offer and agreement” requested by the Examining Authority. Instead, it concludes by directing the Examination to NESO’s TEC Register:

“Information in respect of the Applicant’s connection offer is publicly available at NESO’s TEC Register. This lists all projects, both existing and future, that

hold contracts with NESO for Transmission Entry Capacity (i.e. projects which have secured capacity to export to transmission system).”

A footnoted link to the TEC Register is provided by the Applicant. As SEPE noted during its oral representation at ISH4, NESO’s TEC Register entry for the Scheme (listed under the project name ‘Eaton Socon Solar’, row 666 of 2,219) provides little detail beyond basic project identification. Notably, no Gate information is included and, as at 10 July 2026, the ‘Gate’ column remained blank:

Project Name	Customer Name	Connection Site	Stage	MW Connected	MW Increase / Decrease	Cumulative Total Capacity (MW)	MW Effective From	Project Status	Agreement Type	HOST TO	Plant Type	Project ID	Project Number	Gate
Eaton Socon Solar	BROCKWELL STORAGE & SOLAR LIMITED	Eaton Socon 400kV Substation		0	500	500	31/10/2028	Scoping	Direct Connection	NGET	Energy Storage System;PV Array (Photo Voltaic/solar)	a1f4L000000EHKBQA4	PRO-001513	

The absence of the underlying connection evidence is significant because the evidence before the Examination raises a legitimate question as to whether the planning case now being advanced for the BESS differs materially from that presented in the Application. As set out in section 7, Application documents continue to rely on a 100MW import capability and attribute to the BESS wider flexibility, balancing, reliability and energy security benefits, whereas, as set out in section 8, the Applicant’s recent submissions now characterise grid-import and balancing functions as merely “supplementary” (while simultaneously attempting to preserve those wider functionality claims) and emphasise solar-charged storage as the BESS’s “primary function”. The Planning Inspectorate’s Advice Note 16 recognises that where new information emerges during examination, sufficient information must be provided to enable the implications to be properly understood and assessed. In this case, as established earlier in this submission and detailed in the timeline in Appendix A, Gate determinations were being issued from December 2025, before the Examination commenced, yet the Application has not yet been updated to explain the implications of the BESS’s Gate 1 status, and the Applicant has not provided the evidence of the asserted Gate 2 offer requested by the Examining Authority in Q1.1.20. Accordingly, the Examination has not yet been provided with sufficient information to determine whether the benefits, operational assumptions and planning weight attributed to the BESS in the Application remain unchanged under the current connection position.

The evidence presently before the Examination also raises a legitimate question as to whether the Scheme now being examined corresponds in all material respects with the substance of the Scheme described in the Application.

In particular, the Applicant has not provided:

- evidence substantiating the Applicant's asserted Gate 2 offer for the Scheme, notwithstanding the Examining Authority's request in Q1.1.20;
- the underlying connection-offer wording;
- detailed TEC allocations;
- import-capacity rights;
- balancing arrangements;
- BMU arrangements;
- bilateral agreement provisions;
- operational constraints associated with the current connection position;
- any assessment of how the Scheme's operational case has been affected by the divergence between the solar generating station's Gate 2 status and the BESS's Gate 1 status; or
- a quantified assessment of the extent to which the BESS is expected to rely on grid charging, balancing services and energy arbitrage.

Nor has the Applicant provided a quantified assessment of how the claimed benefits would change if those activities remain constrained.

In the absence of this information, the Examination is being asked to place weight on assumptions which cannot presently be verified. The Examination is also unable to determine whether the operational characteristics and benefits now relied on for the BESS correspond with those described in the Application. Accordingly, the Examination is currently unable to determine whether the planning weight attributed to the BESS should remain unchanged, be reduced or be reassessed altogether in light of the current connection position and the apparent evolution in the role now ascribed to the BESS.

In those circumstances, the burden continues to rest with the Applicant to demonstrate not only that the assumptions underpinning the Scheme remain robust notwithstanding the connection status, but also that the Scheme currently being advanced for examination corresponds in all material respects with the Scheme described in the Application.

10. Planning weight

Where uncertainty remains regarding the operational capabilities relied on to support claimed benefits attributed to the BESS, it appears appropriate for the Examination to exercise caution when determining the weight to be attached to those benefits within the overall planning balance.

This uncertainty extends beyond planning weight and also bears on whether the operational characteristics now relied on correspond with those described in the Application.

SEPE further notes that, if the operational capabilities ultimately available to the BESS prove materially narrower than those described in the Application, this may influence future decisions by the Applicant or a subsequent Scheme owner or operator regarding the scale and timing of the BESS component. Given the substantial projected capital cost of the proposed BESS of approximately £73 million (nearly 20% of the Scheme's construction costs), and the evidence presented in this submission regarding the importance of wider grid participation to the operation and value of utility-scale battery storage, the possibility that the BESS could be deferred or reduced in scope cannot be discounted. This gives further reason for caution when determining the weight to be attached to those claimed benefits which depend on the delivery and operation of the BESS as presently described in the Application.

11. Conclusion and key matters requiring further examination

The Application was originally advanced on the basis of an integrated solar generation and battery storage scheme. However, following Connections Reform, the principal Scheme assets have been assessed and treated differently by the national system operator, with the solar generating station offered Gate 2 status whereas the BESS has been designated a Gate 1 project and does not currently possess a connection offer.

Taken together, the NGET representation, the DESNZ/Ofgem letter, the NESO and ENA guidance, the wider industry evidence, and the disclosures in Brockwell Energy Group Limited's audited Accounts all support the conclusion that the BESS's current connection position has wider implications for its anticipated operation, value and contribution to the Scheme than the Applicant has so far acknowledged:

- NGET's representation confirms that the two principal components of the Scheme are no longer progressing through the connections process on the same basis, and that it is currently "only in a position to progress the designs for the solar connection".
- The NESO and DESNZ/Ofgem material demonstrates that progression from Gate 1 to Gate 2 cannot be taken for granted, and that the battery project pipeline is significantly over-subscribed.
- Wider sector evidence and technical analysis indicate that utility-scale BESS assets commonly derive value from import, balancing and energy arbitrage activities, raising a legitimate question as to the extent to which the benefits attributed to this particular BESS depend on capabilities secured under the current connection position.

- Brockwell Energy Group considers project portfolio Gate 1 risks sufficiently material to warrant disclosure.

While the Applicant has pivoted away from its presentation of the BESS in the Application as a grid-interactive asset with explicit 100MW import capability and balancing functions, and towards a model centred on solar charging, its response to REP2-063 and its submissions at ISH4 seek to imply that the Scheme can proceed substantially as proposed notwithstanding the current connection status. However, SEPE suggests that the Examination has not yet been provided with sufficient evidence to determine whether the operational assumptions, claimed benefits and corresponding planning weight attributed to the BESS in the Application remain justified.

In those circumstances, it remains unclear whether the Scheme currently being examined is materially the same Scheme as that presented in the Application.

The issue is not whether the BESS may ultimately secure additional connection rights in future, but whether the benefits presently relied on by the Applicant are supported by evidence. Until that evidential basis is established, SEPE suggests that caution should be exercised when determining the weight to be attached to those claimed benefits within the planning balance.

SEPE contends that the following matters therefore remain unclear and warrant further examination:

1. Has the Applicant provided the Examining Authority with the executed grid connection agreement(s), including all relevant import and export capacities, constraints and operating assumptions for both the solar generating station and the BESS in the proposed hybrid Scheme?

If not, how can the Examining Authority be satisfied that the project currently undergoing examination corresponds to the project that can actually be connected and operated?

2. Under the current connection arrangements, can the BESS:
 - import electricity from the grid;
 - export independently of contemporaneous solar generation; and
 - participate in balancing and ancillary-service markets in the manner described in the Application?
3. Which specific balancing, reserve and ancillary-service markets could the BESS participate in without grid import capability, and how would its ability to meet service obligations, with financial and contractual penalties attached,

differ from a BESS possessing the 100MW import capability described in the Application?

4. To what extent do the Applicant's assessments of flexibility, energy security, decarbonisation and system balancing rely on grid charging, balancing services, arbitrage activity or independent BESS operation?
5. If the BESS does not ultimately secure Gate 2 connection status, or secures it only with materially different operational constraints, what effect would that have on:
 - the claimed benefits of the Scheme;
 - the operational assumptions relied on by the Applicant; and
 - the planning balance?
6. Given that the Application documents continue to describe the BESS as having import capability and the ability to provide wider grid-balancing, flexibility and energy security functions, while the Applicant now characterises those activities as merely "supplementary" and emphasises solar-charged storage as the BESS's primary role, does the Applicant accept that its case for the BESS has materially changed during the Examination?

If so, what assessment has been undertaken to identify which specific parts of the Application require updating or re-evaluation to reflect that revised position?

7. Has the Applicant complied with Q1.1.20 by providing the evidence requested, and if not, what weight should be attached to unsupported assertions regarding the Scheme's connection arrangements?
8. Given the evidence now before the Examination regarding the BESS's current connection position, and in the absence of evidence demonstrating that the 100MW import capability described throughout the Application has been secured, can the Examining Authority be satisfied that the Applicant has substantiated the flexibility, balancing, energy security and other planning benefits that depend on that capability, or should the planning weight attributed to those benefits now be reassessed?

12. Principal sources

The following inform the issues raised in this submission:

1. National Grid Electricity Transmission plc – Written Representation (7 April 2026). *Project-specific evidence confirming that the solar generating station has received a Gate 2 offer whereas the BESS remains at Gate 1, and that*

NGET is currently progressing design work only for the solar connection. Wider issues relating to proposed Eaton Socon development works detailed.

<https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010141-000501-NGET%20Written%20Representation%20-%20East%20Park%20Energy.pdf>

2. NESO – Gate 1 information. *Evidence that Gate 1 status provides neither a confirmed connection date nor a reserved place in the connection queue and offers no guarantee that a project will ultimately secure a connection. NESO explains that Gate 1 projects do not reserve capacity, do not have protected status and must reapply in a future application window to seek Gate 2 status. For hybrid projects, NESO states that only the Gate 2 component will continue through connection studies and works, underlining the uncertainty associated with components remaining at Gate 1. **Note:** NESO webpage states: “We are providing this additional clarification as some customers have contacted both NESO and DNOs because they are unsure what a Gate 1 outcome means. We recognise that this outcome may be disappointing, and we appreciate your patience and engagement as the electricity connections process undergoes significant reform.”*

<https://www.neso.energy/industry-information/connections-reform/gate-1-information>

3. NESO – Connections reform queue outcomes webinar (8 December 2025). *Evidence that following the methodology used, hybrid projects may receive different Gate outcomes for different technologies, including solar generation and battery storage. The webinar also highlighted the significant oversupply of battery projects within the reformed connection queue.*

<https://www.neso.energy/calendar/connections-reform-queue-outcomes-monday-8-dec>

4. Department for Energy Security and Net Zero and Ofgem – Open letter on Connections Reform delivery (16 April 2026). *Evidence regarding the continuing uncertainty associated with Connections Reform, including the volume of battery projects remaining at Gate 1 and the expectation that not all projects will progress through the queue.*

<https://www.gov.uk/government/publications/connections-reform-delivery-update-and-battery-capacity/open-letter-from-desnz-and-ofgem-on-connections-reform-delivery>

5. Solar Power Portal webinar – What does grid Connection Reform mean for UK solar and BESS developers? (19 January 2026). *Industry commentary illustrating the practical challenges for projects receiving Gate 2 status for*

solar generation while associated battery storage remains at Gate 1, including observations by a sector analyst regarding the serious implications for hybrid developments.

<https://www.solarpowerportal.co.uk/solar-planning/video-what-does-grid-connection-reform-mean-for-uk-solar-and-bess-developers?>

6. Osborne Clarke LLP – Ofgem finalises the connections queue reform (December 2025), Walker Morris LLP – New connections delivery pipeline explained: who benefits and what comes next? (December 2025), Knight Frank LLP – Connection Reform update: a new pipeline announced (December 2025), and Burges Salmon LLP – NESO announces grid Connections Reform timeline (October 2025). *Evidence from professional advisers active in the UK energy and infrastructure sector highlighting the uncertainty associated with projects that remain at Gate 1 under the Connections Reform regime, including the risk that some projects may not secure Gate 2 status and observations on the implications of the reformed connections process for project development, financing and delivery.*

<https://www.osborneclarke.com/insights/energy-transition-ofgem-completes-gb-grid-connections-overhaul-2035>

<https://www.walkermorris.co.uk/comment-opinion/new-connections-delivery-pipeline-explained-who-benefits-and-what-comes-next/>

<https://www.knightfrank.co.uk/research/article/2025/12/connection-reform-update-a-new-pipeline-announced>

<https://www.burges-salmon.com/articles/102lpup/neso-announces-grid-connections-reform-timeline/>

7. Brockwell Energy Group Limited Annual Report and Consolidated Financial Statements for the financial year ended 31 March 2025 (filed 30 April 2026). *Evidence that Brockwell Energy Group recognises uncertainty associated with projects remaining at Gate 1 under the reformed grid connection regime, including the risk that such projects may not secure Gate 2 status and the consequent implications for project viability and asset values. The disclosure demonstrates that Gate 1 status is recognised by the Scheme's own development group as a material source of uncertainty.*

<https://find-and-update.company-information.service.gov.uk/company/11570113/filing-history>

8. Professor Tony Day – Battery energy storage trading: who pays the price? Large-scale solar utilities with co-located battery storage – a brief exploration of the business case (February 2026). *Analysis that suggests that co-located utility-scale battery storage increasingly derives operational and economic*

value from grid services, energy arbitrage and wider market participation, rather than solely from storing surplus solar generation.

<https://www.uksolaralliance.org/nsips>

9. NESO – Guidance on enabling asset metering for co-located assets. *Technical evidence demonstrating that co-located solar generation and battery storage assets remain operationally distinct, with separate metering, balancing and operational requirements, and that independent BESS import and export activity is a recognised operating mode.*

<https://www.neso.energy/document/370271/download>

10. Energy Networks Association (ENA) – Electricity storage guide. *Evidence that electricity storage assets possess materially different network characteristics from solar generation and may require distinct import and export capabilities, giving rise to different network impacts and operational considerations.*

<https://customer.nationalgrid.co.uk/downloads/5384/ena-electricity-storage-guide-final.pdf>

11. DESNZ – Energy trends: UK renewables, renewable electricity capacity and generation. *Evidence demonstrating the pronounced seasonal variability of solar electricity generation in the UK, with output concentrated in spring and summer and significantly reduced during autumn and winter, indicating that opportunities for a co-located battery to charge solely from contemporaneous solar generation may be limited for extended periods of the year.*

<https://www.gov.uk/government/statistics/energy-trends-section-6-renewables>

12. NESO – Transmission Entry Capacity Register. *Evidence that the East Park Energy entry on the TEC Register identifies the project as ‘Eaton Socon Solar’ but does not include Gate status or the underlying connection offer requested by the Examining Authority.*

<https://www.neso.energy/data-portal/transmission-entry-capacity-tec-register>

Appendix A – Timeline: NESO Connections Reform Gate notifications, Application milestones and Examination submissions

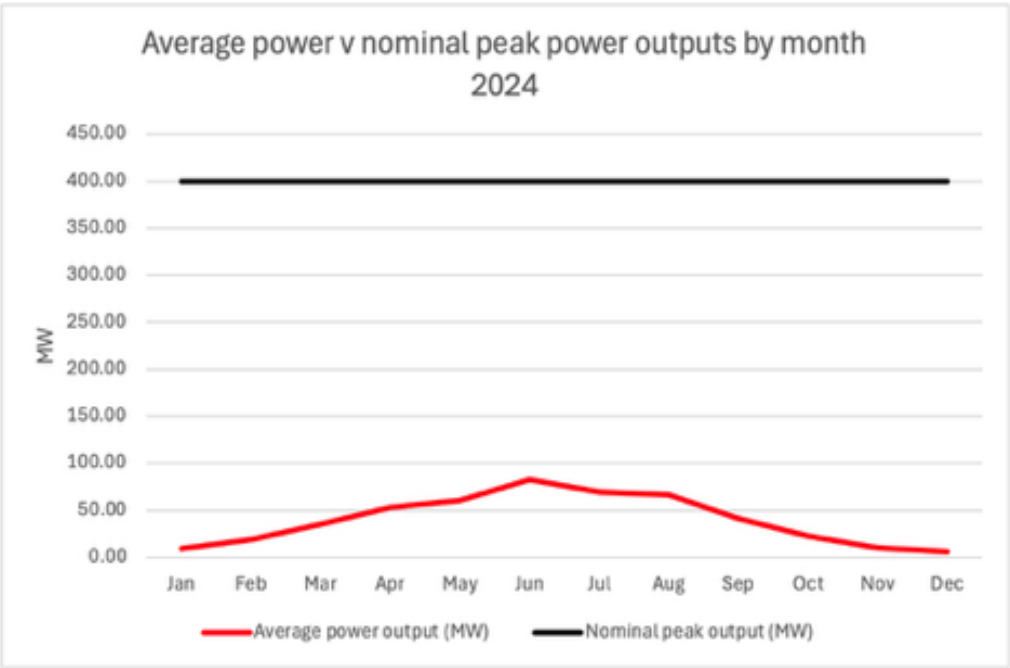
- **3 October 2025**
East Park Energy solar power and battery energy storage system Application submitted.
- **30 October 2025**
Application accepted for Examination.
- **December 2025**
Results of the National Energy System Operator’s connection queue reform process, including project Gate status notifications, start being released to customers.
- **17 March 2026**
Examination commenced.
- **7 April 2026 (Deadline 1)**
National Grid Electricity Transmission Written Representation provides the first evidence to the Examination that the BESS has been assigned Gate 1 status.
- **28 April 2026 (Deadline 2)**
Interested Party submission REP2-063 raises the significance of the BESS Gate 1 status and consequent BESS operational uncertainty.
- **5 May 2026 (ExQ1)**
Q1.1.20 asks the Applicant for evidence of the asserted Gate 2 offer. In its response at Deadline 3, the Applicant does not provide the requested evidence; it refers only to the TEC Register, a tabular data file, which includes basic information and does not provide Gate details for the Scheme entry.
- **26 May 2026 (Deadline 3)**
The Applicant responds to Interested Party REP2-063, reframing the role of the BESS and suggesting that Gate 1 status is principally a matter of timing, and that the battery can export “stored solar electricity...through the Gate 2 solar generation connection offer”. SEPE sets out details of issues relating to grid connection uncertainty (REP3-108).
- **9 June 2026 – BESS Issue-Specific Hearing**
The Applicant revisits comments previously submitted at Deadline 3 in response to REP2-063, and further reframes its position in response to oral representations made by Interested Parties. SEPE draws the Examining Authority’s attention to the response made by the Applicant to Q1.1.20. Interested Parties raise concerns regarding the project’s Gate status, highlighting the significance of the NGET submission, government and regulator communications and wider industry commentary.

Appendix B – Regional and local solar generation: seasonal patterns and implications for solar-only BESS charging

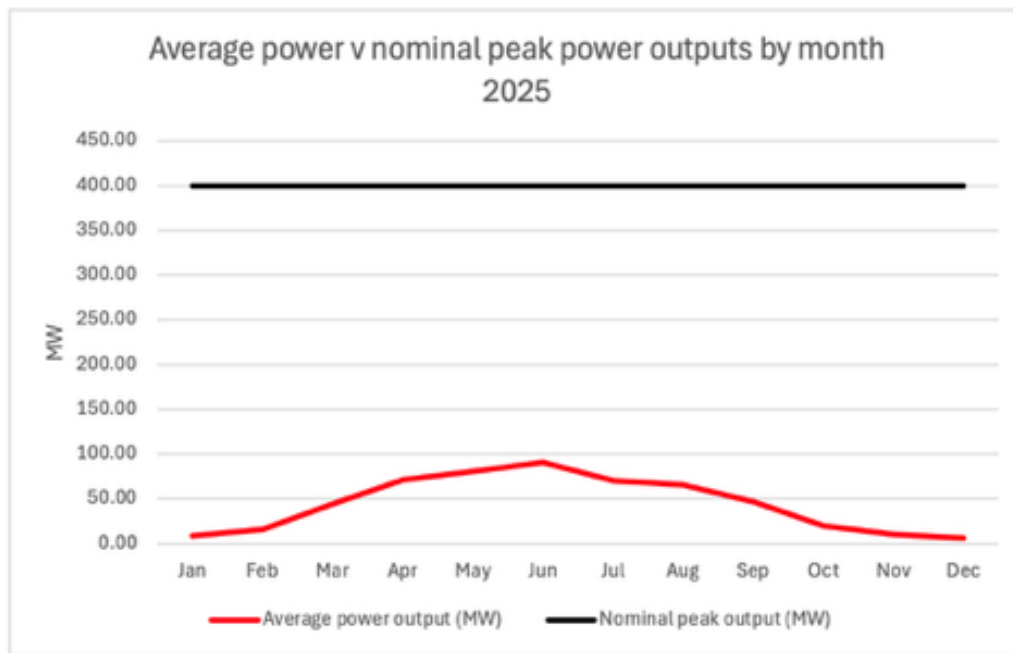
The charts in this Appendix present regional solar insolation projections as well as operational generation data from the Manor Farm solar site, directly adjacent to the Scheme, to illustrate the practical implications of a BESS that is reliant solely on charging from on-site solar generation. The charts demonstrate the pronounced seasonal variability of solar output, showing extended periods during autumn and winter when charging opportunities would be limited. They illustrate that, without the ability to import electricity from the grid, a solar-only BESS would be under-utilised for significant parts of the year, constraining its availability to provide the wider flexibility, balancing and energy security benefits claimed for the Scheme.

Note that the charts (specifically 1 and 2, which show full installed capacity on the ‘y’ axis) also illustrate how projected and actual solar output remains far below installed capacity.

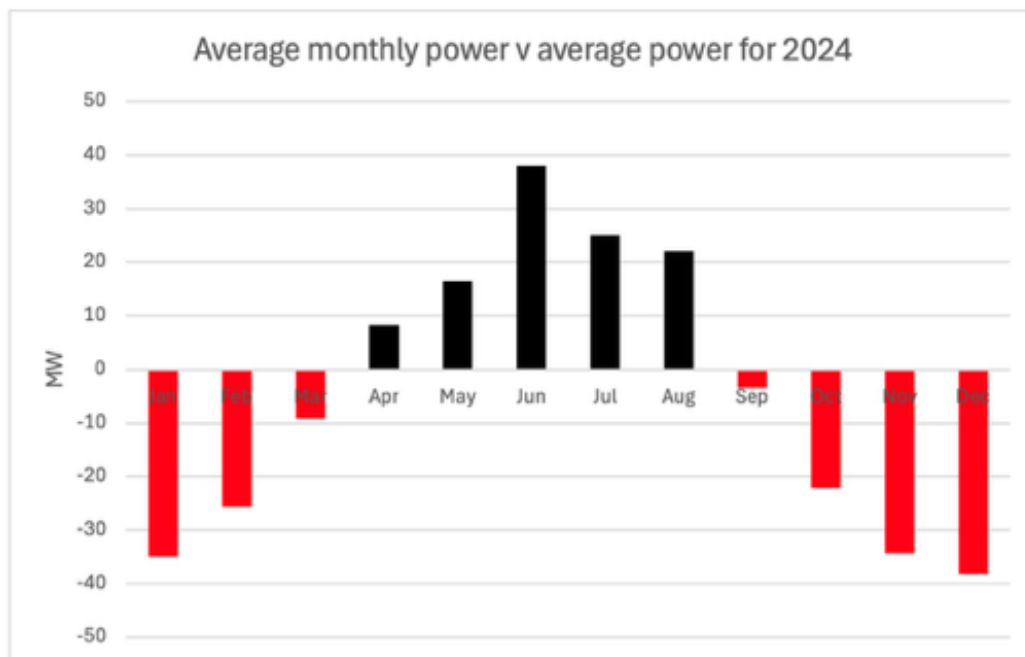
Note also that Chart 5 compares the Manor Farm capacity factor with the national average over its first two full years of operation. During this period, Manor Farm underperformed the national average by 10–15%. As these data relate to the beginning of the site’s operational life, the PV panels would not yet have experienced any significant age-related degradation, meaning the observed capacity factors are not attributable to age-related declines in panel performance.



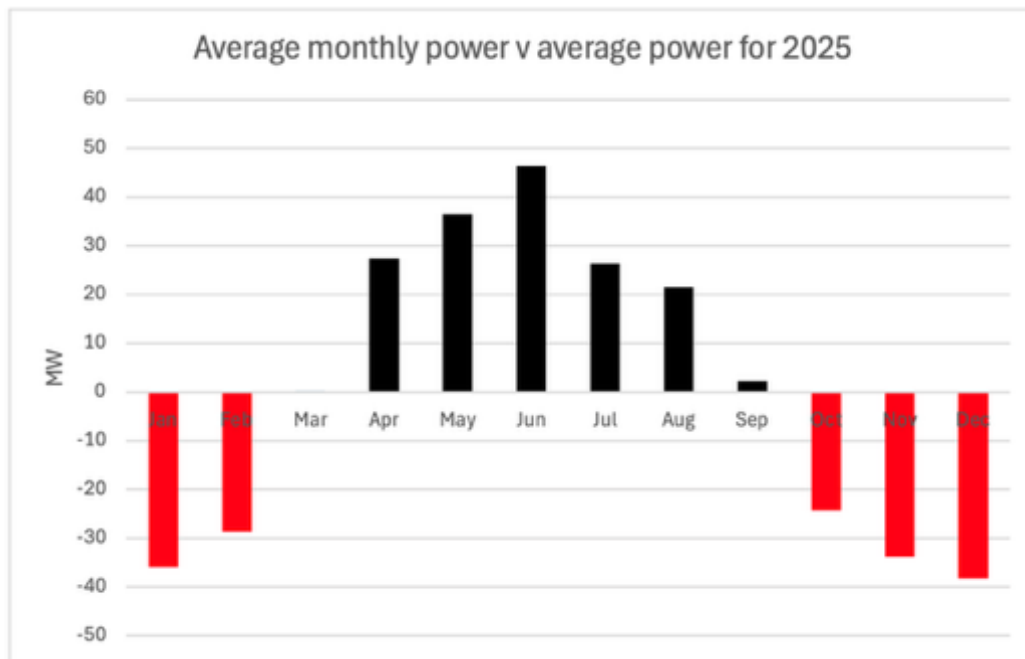
1 Illustrative monthly generation profile for a 400MW solar installation based on regional insolation data representative of eastern England in 2024



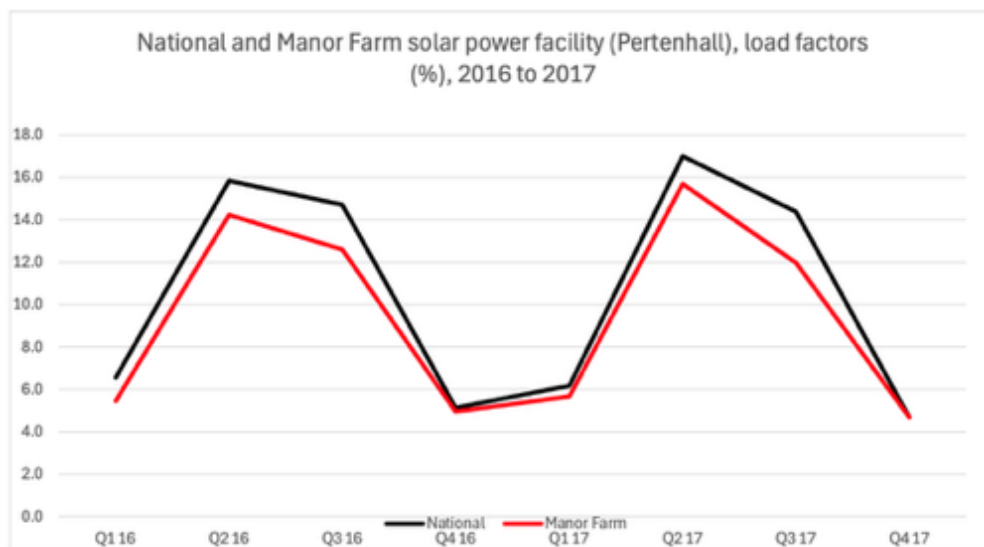
2 Illustrative monthly generation profile for a 400MW solar installation using 2025 regional insolation data, representing a high-insolation year



3 400MW capacity solar power facility (illustrative) showing output based on actual regional insolation data for 2024, monthly generation as a percentage deviation from annual average output (39MW)

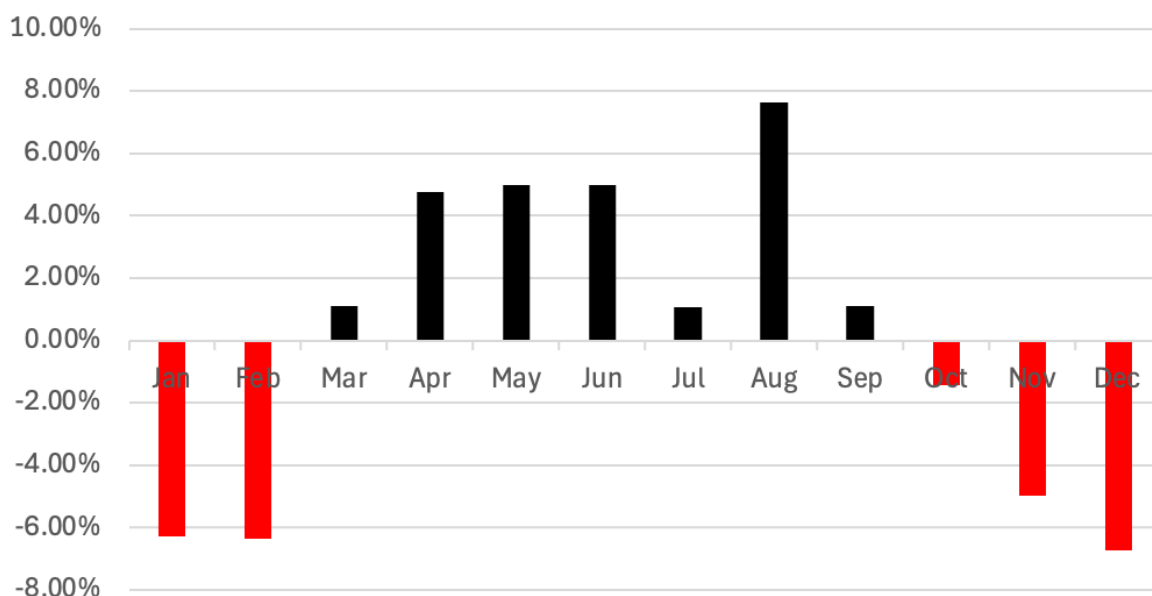


4 400MW capacity solar power facility (illustrative) showing output based on actual regional insolation data for 2025 (sunniest year on record), monthly generation as a percentage deviation from annual average output (44 MW)



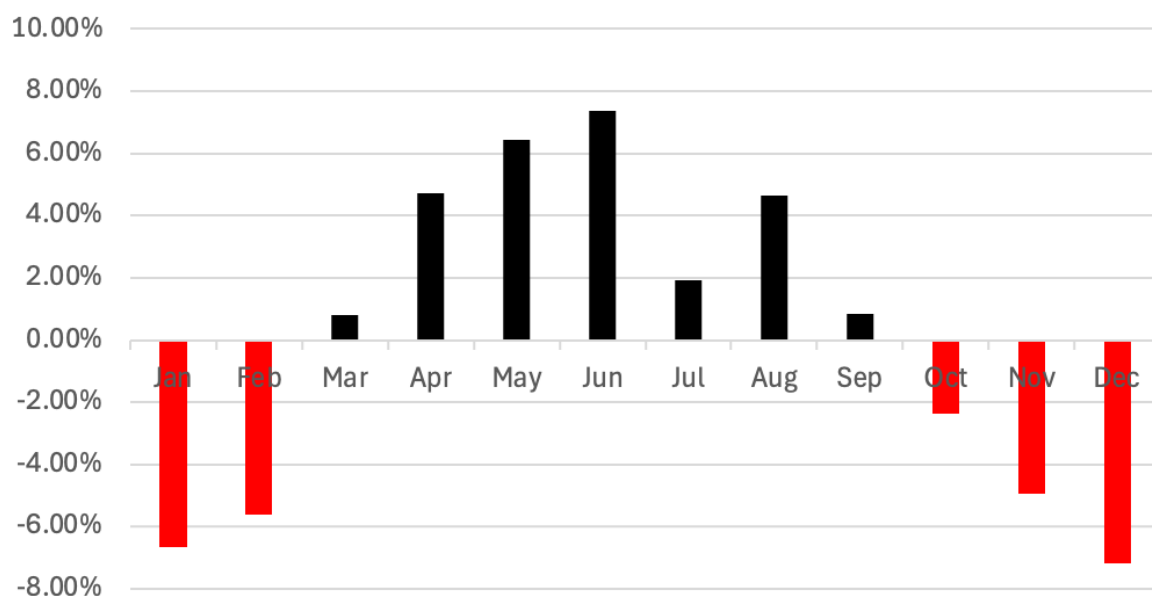
5 Capacity factors recorded at the Manor Farm solar installation (directly adjacent to and part-surrounded by East Park Energy), compared with national capacity factor averages

Average monthly power v average power for 2016



6 10.2MW capacity Manor Farm solar facility, first full year of operation, showing actual output, monthly generation as a percentage deviation from annual average output (1.30MW)

Average monthly power v average power for 2017



7 10.2MW capacity Manor Farm solar facility, second full year of operation, showing actual output, monthly generation as a percentage deviation from annual average output (1.33MW)

Data: Department for Energy Security and Net Zero – *Energy Trends: UK Renewables*; energymap.co.uk.