

#### BESS submissions for Deadline 7

Once again, at a late stage, EPE has materially changed their application whilst the Examining Authority continues (at great speed) to review a scheme which now significantly differs from the original application. SEPE and other Interested Parties have made representations concerning the status of the BESS and the viability of the scheme, including ... 'Brockwell have previously shown they need the BESS to ensure viability of the scheme, with that BESS being able to trade off-peak (frequently gas generated) electricity. Without the BESS there are doubts about the overall scheme's deliverability. At this stage the N.G.E.T are only able to progress the designs for the solar connection under the Gate 2 offer. They have confirmed the BESS element of the scheme does not even feature in their plans for the Eaton Socon Substation. This uncertainty regarding any possibility of a Gate 2 connection is highlighted in the April 2026 open letter issued by the Department for Energy Security and Net Zero (DESNZ) and Ofgem, which explicitly acknowledges that the current grid connections queue contains a "battery surplus" – that is a substantial oversupply of battery storage projects – hence many schemes will not secure viable connections.' Brockwell's answer to these points has been to tone down much of their language in references to the BESS's ability to provide any arbitrage. At the same time they continue to describe their scheme as a flexible energy hub capable of importing and exporting power to the grid. In contrast NGET acknowledge they are only in a position to progress the designs for the solar connection. Of course, the deliverability of that solar power is hugely seasonal; for 6 months of the year it is acknowledged to be operating at only around 5-6% of its stated output capacity and this is during the times of peak electricity demand. The Examining Authority should seek to be provided with the detailed evidence demonstrating the long term viability of the scheme without the Gate 2 BESS connection and at the same time re-evaluate what if any planning gain or other benefits can be attributed to such a scheme when set against the loss of valuable food producing BMV agricultural land.