

Introduction

Google welcomes the opportunity to respond to the Autoriteit Consument & Markt (ACM) draft decision on a new prioritization framework for transport requests in the Dutch electricity grid (ACM/25/194782). We understand the critical need to address grid congestion and ensure the timely connection of projects that serve significant public interests. Our response aims to provide constructive feedback to further refine the framework, ensuring it aligns with broader governmental objectives and promotes efficient grid development.

Below is our general feedback, primarily addressing the request for information under Consultation question 2.

Consultation Question 2 a. Do you believe it is desirable to abandon FCFS for congestion relievers?

We believe it's beneficial to move away from a queue management approach based entirely on the principle of FCFS, and to instead adopt a connection queue management regime based on 'readiness'.

The present FCFS approach is a major cause of delays. It allows speculative, immature projects to occupy queue positions for years, creating artificial backlogs that block the progress of mature projects that are ready to be built.

More can be done in particular to accelerate connections for demand customers, in order to avoid delaying Netherlands' ambition to electrify and digitalise. Connections for both demand and generation/storage customers can be accelerated by moving away from first-come first-serve towards prioritization based on 'readiness' criteria (e.g., control of land, creditworthiness), as has been implemented in the UK, Norway and other markets.

Different, tailored criteria will need to be applied to the generation and storage queue vs. the demand connection queue, given the different nature of these projects.

Therefore, we believe it is crucial that **the introduction of a priority framework for transport requests should be accompanied by broader reforms to connection queue management to avoid unintended consequences**. Additional measures such as the adoption of a 'readiness' framework, and strategic coordination for the generation + storage queue (see below) are also needed to avoid delays for connecting parties that are not in one of the eligible priority connection categories. For example - prioritising connections for one particular sector or technology, without any additional measures to filter out speculative projects from within that sector / technology, could result in speculative projects blocking the progress in the queue of more mature projects from non-eligible sectors

Strategic coordination for the generation + storage queue

The guidelines should also promote the adoption of a more 'strategic coordination' approach to

managing the generation + storage connection queue, as has recently been applied in [Great Britain](#). In that example, by establishing regional quotas for each generation technology based on the anticipated needs to decarbonise the GB grid, and prioritising the most mature of those projects, the National Electricity System Operator (NESO) is able to remove a lot of speculative generation and storage projects from the queue. This allows for faster connection of 'ready' generation/storage projects, as well as demand projects. 'Strategic coordination' approaches must, however, avoid being overly prescriptive, particularly when setting quotas, in order to allow market forces to still play a strong role in delivering the optimal generation mix.

Examples: Recent reforms by NESO in Great Britain introduced elements of all of the above include i) a staged / gated process, ii) readiness criteria (land ownership / control required to progress to gate 2), iii) strategic coordination for shortening the generation + storage queue

Consultation Question 2 **b. If so, do you believe that grid operators should themselves establish transparent and objective criteria on the basis of which they determine in a non-discriminatory manner the order in which transport capacity can be granted to congestion relievers?**

Criteria that support accelerated connections for projects that contribute to alleviating congestion could be beneficial. However measures are needed to ensure that such criteria do not lead to increased connection timelines for demand connections, specifically:

- **Separating Generation/Storage and Demand Queues:** When applying a congestion reliever criterion, manage the generation + storage connection queue separately from the demand connection queue to avoid a situation where a large volume of demand connections are pushed to the back of the queue. For example - if all storage projects can qualify as congestion relievers, this would move all such projects to the front of their respective connection queues, regardless of their maturity, and push mature demand connections backwards in the queue. The generation + storage queue should therefore be treated separately from the demand connection queue.
- **Expand the definition of Congestion Reliever:** Ensure that demand connections can also qualify as congestion relievers provided they can demonstrate that their load profile and any co-located resources (e.g. battery storage) will provide congestion relief. When establishing a congestion reliever criterion, such rules must clarify that demand connections can qualify under these circumstances. It should be the connecting party's responsibility to demonstrate that they will relieve congestion in order to achieve eligibility. The criteria should also account for possible future congestion and the connecting party's ability to relieve this.
- **Transparent criteria:** more data and clarity must be provided to connecting parties about exactly what the source of congestion is, when it typically occurs, and what measures would alleviate it, so that they can work to address it. By being transparent about the constraints, market participants can more effectively resolve them.

Criteria that prioritize connection requests based on their contribution to the clean energy transition or other strategic goals like digitalization could be beneficial. However, such criteria

must be very carefully designed to avoid negatively impacting other customers with mature projects that are seeking to connect. Such criteria should be well-specified and targeted to ensure they do not apply to all projects that address this goal, or to an entire sector, but rather to a subset. For instance, a criterion that accelerates connections for projects contributing to the clean energy transition could bring forward all wind, solar and storage projects in the connection queue at the expense of demand projects.

Similarly, it is not advisable to grant an entire sector or technology type priority connection without an additional mechanism to assess projects' readiness and strategic alignment. Any prioritization framework must be accompanied by a 'readiness' framework to filter out less credible or speculative projects. This ensures that valuable, limited grid capacity is allocated to projects that are genuinely prepared to proceed, minimizing "capacity hoarding" by speculative ventures. If an entire sector is prioritised, projects that are not sufficiently mature could be brought forwards in the queue, at the expense of mature projects from other sectors. Therefore such criteria must i) be very well-specified so as to bring forward only the most impactful projects, and ii) be coupled with a readiness framework.