

1A The Applicant must declare the target generating capacity. The ExA cannot determine whether the proposal provides satisfactory use of the land (hectares) if the output (either MW or GWh/year) is not known. Repeating "over 50 MW" a hundred times will not suffice. NPS EN-3 (2024) requests the output specification as export capacity (MW_{ac}), but given the tracker proposal (**1C** below), GWh/yr might be appropriate.

1B Output capacity [DCO Schedule 1 **2**]

Similarly to previous DCOs, this is specified as "over 50 megawatts"

If a solar farm that is approved at examination at 400 MW proves to generate only 51 MW in operation (peak output midday June), currently the SoS cannot complain that it is underperforming. This cannot be right. Should a minimum acceptable performance level be agreed, such as "over 350 megawatts" in the DCO Schedule (i.e. Rochdale Envelope)?

1C The use of tracker PV panel configuration will be unique in the UK. The decision is risky at best. Should the Applicant at least provide its comparative graphs of simulated projected output, etc, to justify this departure from received wisdom? (Ideally, expert analysis needed).

2A Given the government's ambition of urgent adoption of renewables (NPS, White Paper, Energy Security, etc, etc) and the Applicant's agreement [ES Introduction 1.6.6; Statement of Need 1.1.3, 1.2.5 &c; etc] should the start of construction [DCO Schedule 2 **2**] be reduced from the default 5 years to, say, 18 months?

2B Given the reasons in **2A**, should there additionally be a stipulated commission date, e.g. within 3 or 4 years?

2C Should the 40 years lifespan be removed? The Applicant's response [ES The Scheme 2.8.1-3] did not address the Scoping Opinion enquiry [ID 21.12]. There is no obvious reason for a solar farm to be a time-limited installation (unlike a nuclear reactor). Future generations must be allowed to determine its continuing operational life based on prevailing policies/conditions.

2D Decommissioning Fund - is addressed in ISH1 Item 3(f)

3 Battery (BESS). This was included in the Scoping Report, but removed for the final submission [Design and Access 4.3.15(a)]. The Battery has proved the most contentious issue in previous examinations. Nevertheless:

Does a solar farm require battery storage for compatibility with future energy requirements? [REDACTED]

[REDACTED] Pending NSIP proposals range arbitrarily from 100MW to 2400 MWh (where a battery capacity is specified). Is there a theoretically correct value? [REDACTED]

[REDACTED] Can the battery go anywhere on the grid, or is there an advantage in co-locating with solar PV? [REDACTED]

This might benefit from ISH examination, and expert consultation.

4A The Funding Statement [APP/4.2] has irregularities: not least, the Supporting Letter from Pellion does NOT agree to fund the project, only the DCO application ("Request for Proposal" in the obliquely translated German). Emphatically denies commitment to pay for a solar farm (paragraph 4).

I don't think the DCO needs proof of project funding, but compulsory acquisition [APFP Reg 5(2)(h)] does.

4B BOOM is the sole shareholder [Funding 2.1.2] yet Eclipse (an iDNO) is going to be "responsible for ongoing ownership" of substations, grid corridor etc [Grid Connection Statement 4.1.2]. Conflict? Should Eclipse at least contribute a confirmation letter of intent/commitment?