



Long Duration Electricity Storage Team

Ofgem  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

**Uniper UK Limited**  
Compton House  
2300 The Crescent  
Birmingham Business Park  
Birmingham B37 7YE  
[www.uniper.energy](http://www.uniper.energy)

Registered in  
England and Wales  
Company No 2796628

Registered Office:  
Compton House  
2300 The Crescent  
Birmingham Business Park  
Birmingham B37 7YE

**Call for input - LDES Cap and Floor Regime: Our Role, Plan, and response to the DESNZ publication**  
January 8, 2025

**About Uniper**

Düsseldorf-based Uniper is a European energy company with global reach and activities in more than 40 countries. With approximately 7,400 employees, the company makes an important contribution to security of supply in Europe, particularly in its core markets of Germany, the UK, Sweden and the Netherlands.

Uniper's operations encompass power generation in Europe, global energy trading, and a broad gas portfolio. Uniper procures gas—including liquefied natural gas (LNG)—and other energy sources on global markets. The company owns and operates gas storage facilities with a total capacity of more than 7 billion cubic meters.

Uniper intends to be completely carbon-neutral by 2040. Uniper aims for its installed power generating capacity to be more than 80% zero-carbon by the early 2030s. To achieve this, the company is transforming its power plants and facilities and investing in flexible, dispatchable power generating units. Uniper is already one of Europe's largest operators of hydropower plants and is helping further expand solar and wind power, which are essential for a more sustainable and secure future. The company is progressively expanding its gas portfolio to include green gases like hydrogen and biomethane and aims to convert to these gases over the long term.

Uniper is a reliable partner for communities, municipal utilities, and industrial enterprises for planning and implementing innovative, lower-carbon solutions on their decarbonization journey. Uniper is a hydrogen pioneer, is active worldwide along the entire hydrogen value chain, and is conducting projects to make hydrogen a mainstay of the energy supply.

In the UK, Uniper owns and operates a flexible generation portfolio of power stations and a fast-cycle gas storage facility.

**Response to Call for input**

Uniper is a developer of LDES projects and responded to the 2021 BEIS Call for Evidence and the 2024 DESNZ consultation. We do not answer each question in this call for input, but would like to offer the following perspectives.



The timeline for Window 1 is ambitious, especially since developers have not yet had sight of the proposed process and rules. To streamline application submissions and the project assessment process, we would like to see:

- Early Access to Guidelines: Offering developers early access to the proposed process and rules will allow them to better prepare their submissions. This can help in identifying potential issues and addressing them proactively.

- Flexible Eligibility Criteria: While projects that are further advanced in their development stage may seem more prepared, this doesn't necessarily mean these are better projects. Therefore, the eligibility criteria should not exclude projects that are currently less mature, but that could be deliverable on faster timelines. This approach ensures that innovative and deliverable projects are not overlooked.

- Streamlined Documentation Requirements: Simplifying the documentation requirements for the initial submission can reduce the burden on developers and expedite the review process. Essential documents can be prioritised, with additional details requested at later milestone stages if needed.

- Clear Communication Channels: Establishing clear and open communication channels between developers and the assessment team can facilitate quick resolution of queries and issues. Regular updates and feedback can help developers stay on track and make necessary adjustments promptly.

This will enable an efficient application submission and project assessment process, ultimately supporting the successful delivery of projects within the ambitious timeline.

Some of the criteria proposed will exclude projects that have not already begun FEED, entered the planning permission process and sought a grid connection, from this first round of funding. This is likely to be broadly true for more novel storage solutions that have not previously had a route to market, such as compressed air energy storage. Early visibility of future windows and indicative capacity requirements will encourage developers to bring forward further projects featuring a wider range of technologies.

The relationship between the Strategic Spatial Energy Plan (SSEP), the Centralised Strategic Network Plan (CSNP), the Clean Power 2030 Plan and the connection reform process is evolving. Ofgem should clearly establish with NESO how LDES projects will be treated in the context of these plans. This is essential for LDES project developers if a connection offer is required to be eligible to apply for the LDES cap and floor regime.

In conclusion, Uniper welcomes the introduction of a cap and floor regime for LDES. Mature technologies such as pumped hydro are likely to strongly feature in the first window but Ofgem should ensure that the regime is accessible to a wide range of technologies.

Uniper UK Limited