

Connections Reform - Policy Consultation on Required Licence Changes Response Form

We are consulting on conditions in the Electricity System Operator, Transmission and Distribution licences in relation to the ongoing connections reform process, which aims to enable quicker connection for ready-to-connect projects that align with strategic energy system plans and provide a more coordinated and efficient network design for connections.

We would like views from stakeholders with an interest in the electricity connections process and the ongoing reforms. We particularly welcome responses from connection customers, developers and network companies. We also welcome responses from other stakeholders including members of the public.

Your feedback is important to this process. Please take this opportunity to provide any feedback that you may have. To aid your response, each question is linked back to the relevant document for ease of reference.

We encourage you to read the Connections Reform - Policy Consultation on Required Licence Changes and the subsidiary documents:

- **Annex A:** Proposed NESO Licence Modifications; and
- **Annex B:** Proposed Transmission Standard Licence Modifications before responding to the consultation questions.

This document outlines the questions for this consultation and once the consultation is closed, we will consider all responses.

Please provide your feedback using this response form and sending a copy to connections@ofgem.gov.uk by 5pm on 6th January 2025.

We encourage early submission ahead of the deadline where possible to aid the processing of responses.

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Data and confidentiality

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Date of submission:
6 January 2025

Do you want your response treated as confidential? Please choose the option that is relevant to you.

Yes / No No

Please tell us if parts of your responses or your whole response contains confidential information and explain why below.

[Write your response here]

Consultation questions

Proposed Electricity System Operator Licence Conditions

General approach to changes to the Electricity System Operator licence

1. Do you agree that licence changes are necessary to adequately facilitate the policy intent of the reformed Connection Process, if it is approved?

Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

2. Do you agree with the approach summarised in paragraphs 3.2 to 3.8?

Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

3. Do you agree that we have considered all relevant areas of the licence which might need modifications, and that we have proposed changes in relation to all relevant matters? If there are areas we need to consider further, please specify. Also, please specify any matters that we have addressed but which you do not think should be relevant.

Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

Section A: Definitions and Interpretation

Condition A1:

4. Do you agree that the new definitions as set out in paragraphs 3.12 to 3.19 and draft legal text in condition A1, as set out in Annex A, are necessary to and adequately facilitate the policy intent of the reformed Connection Process?

Please provide the reasons for your answer and any alternative suggestions if you disagree.

Yes/ No Click or tap here to enter text.

[Write your response here]

5. Do you agree that no changes are required to the existing definitions in condition A1, as set out in Annex A, and that the proposed new changes are enough?

Please provide the reasons for your answer and identify any changes you consider to be needed.

Yes/ No Click or tap here to enter text.

[Write your response here]

Condition B3: Conduct of ISOP Business

6. Do you agree this clarification in paragraph 3.21 and proposed text in condition B3, as set out in Annex A, is required?

Please provide the reasons for your answer.

Yes/ No Yes, clarification is needed

We agree that clarification is needed as the principles behind TMO4+ does risk that they would be in breach of this obligation.

The 'Project Designation Methodology' is new and provides high-level criteria as to how it will be applied but has not been used in practice. As it could be argued that introducing such a methodology could inherently be in conflict with the aim of B3.2, we would suggest alternative drafting along the lines of:

"Compliance with the Connections Methodologies will not be deemed a breach of this obligation."

Condition C11: Requirements of a Connect and Manage Connection

7. Do you agree with the policy intent behind the changes we are proposing that these types of “full” offers will only be made to the “non-gated” applications or “Gate 2” applications?

Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

We understand the policy intent for these offers. Our concern is that the status of embedded projects that do not meet the Connections Criteria is unclear. This applies to both existing projects that do not meet the Readiness Criteria and new projects that do not meet the Strategic Alignment Criteria. The implications for Distribution are described in our answer to question XX below.

8. Do you agree that proposed text in condition C11, as set out in Annex A, gives appropriate effect to the policy intent?

Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

Section E: Industry Codes and charging

Condition E2: Connection and Use of System Code (CUSC)

9. Do you agree with the policy intent behind the changes we are proposing in paragraphs 3.28 and 3.29?

Please provide the reasons for your answer.

Yes/ No yes

[Write your response here]

10. Do you agree that proposed text in condition E2, as set out in Annex A, gives appropriate effect to the policy intent? Do you think any further changes would be appropriate?

Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

We note the different phasing used here "*consistent with E15.5*" compared to other sections where "*in accordance with E15.5*" is used and suggest standardising the phraseology.

Condition E12 (New): Connection Criteria Methodology

11. Do you agree with the proposal for the licensee to create and maintain the Connections Criteria Methodology as in paragraphs 3.30 and 3.34?

Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

12. Do you agree with the objectives and scope of the Connection Criteria Methodology as in paragraphs 3.32 and 3.33, respectively?

Please provide the reasons for your answer.

Yes/ No No

We do not think that E12 clearly sets out the relevant objectives of the Connections Criteria Methodology. We would expect the relevant objectives to define what the Methodology seeks to achieve and its purpose. In the proposed drafting the wording merely requires consideration of the Clean Power 2030 Action Plan and the readiness of applicants to connect. Without clear objectives embedded in the licence we are concerned that that the Methodology could change completely and thus compromise the levels of governance associated with it.

Additionally, we note that the Methodologies covers aspects where DNOs and Transmission Connected IDNOs preform some of the activities.

The Methodology does not propose to issue "Gate 1" offers to embedded projects and we think this will cause issues for embedded projects, this if further explained in our response to question XX.

13. Do you agree that the new condition E12, as set out in Annex A, provides the right level of governance and industry engagement to ensure that the Connections Criteria Methodology is developed and modified in a robust manner?

Please provide the reasons for your answer.

Yes/ No No

We are concerned that the licence drafting only has provision for NESO or Ofgem to initiate changes. Whilst there is an obligation for NESO to consult, this could be interpreted to be limited to any specific change being consulted on. We think that some additional wording that NESO needs to have regard to issues that are raised by any party that is materially affected should be included. This would provide a route for third parties to raise issues and place a requirement on NESO

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to have due regard of them and publish its consideration, justifying where they deem no changes are action is necessary. Similarly, where NESO does consult on a change, then it should have an explicit obligation to at least consider the responses.

This would mitigate the risk for parties affected by not having the Methodologies under full open governance. Without this formal route to raise issues and have them considered, the only route for affected parties would be to lobby Ofgem to seek the instigation of the change. We think this works against the intention of defining the governance process in the licence.

Condition E13 (New): Connection Network Design Methodology

14. Do you agree with the objectives of the Connections Network Design Methodology as in paragraph 3.38?

Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

We do not think that E13 clearly sets out the relevant objectives of the Connections Network Design Methodology. We would expect the relevant objectives to define what the Methodology seeks to achieve and its purpose.

The bullet points in 3.35 includes suitable wording that could be used to make the relevant objective clearer.

We would expect these objectives to be what any proposed changes to the Methodologies as assessed against under the governance arrangements. These therefore need to provide sufficient 'guide rails' as to what the Methodology's purpose is.

15. Do you agree with the scope of the Connections Network Design Methodology as set out in paragraph 3.35 and 3.37 is aligned with the TMO4+ connection reform process?

Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

The scope needs to provide clarity for what will happen to embedded projects. See also our response to **question XX**.

16. We have kept the licence change broad for 'preparing offers' as in paragraph 3.37. Should we be more specific with the scope to include further description in the licence that it will determine the queue order, study applications and assess the infrastructure required to enable/prepare offers to enter into a "Gate 2" agreement?

Please provide the reasons for your answer.

Yes/ No [Click or tap here to enter text.](#)

We think this is the sort of wording that should be in the relevant objectives.

17. Do you agree that the proposed addition of conditions E13 , as per Annex A, and in this section provides the right level of governance and industry engagement to ensure that the Connections Network Design Methodology is developed and modified in a robust manner?

Please provide the reasons for your answer.

Yes/ No [Click or tap here to enter text.](#)

We are concerned that the licence drafting only has provision for NESO or Ofgem to initiate changes. Whilst there is an obligation for NESO to consult, this could be interpreted to be limited to any specific change being consulted on. We think that some additional wording that NESO needs to have regard to issues that are raised by any party that is materially affected should be included. This would provide a route for third parties to raise issues and place a requirement on NESO to have due regard of them and publish its consideration, justifying where they deem no changes are action is necessary. Similarly, where NESO does consult on a change, then it should have an explicit obligation to at least consider the responses.

This would mitigate the risk for parties affected by not having the Methodologies under full open governance. Without this formal route to raise issues and have them considered, the only route for affected parties would be to lobby Ofgem to seek the instigation of the change. We think this works against the intention of defining the governance process in the licence.

Condition E14 (New): Project Designation Methodology

18. Do you believe the NESO should be able to designate projects for prioritisation in the circumstances as specified in paragraph 3.42?

Please provide the reasons for your answer.

Yes/ No [Click or tap here to enter text.](#)

Whilst we recognise that there could be situations whereby certain projects should have some preferential treatment, the mechanism of a Project Designation does raise some concerns.

Firstly, by design, this creates a situation where certain projects will get preferential treatment and therefore raises the risk that other projects are disadvantaged which is against the existing obligations set out in B3.

We note that the criteria set out in 3.42, vary in terms of the threshold applied with some requiring it to be "critical" whereas others are to "materially reduce". The criteria for these are not fully defined and therefore will require a degree of subjectivity and we think clear justification of these is necessary.



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We think that embedded projects should also have the ability to become Designated Projects. Whilst not precluded by the drafting, explicit acknowledgement would be welcome.

19. Do you agree that the NESO should only be able to designate projects after a period of consultation as in paragraph 3.43, for existing agreements also in the first application window?

If not, please explain your reasoning, along with alternative suggestions if appropriate.

Yes/ No [Click or tap here to enter text.](#)

The description in 3.43 is confusing as it implies a route in lieu of consultation. We think there needs to be quite exacting requirements as this process conflicts with the current obligations under B3. We agree that NESO should publish its minded to decision, including the supporting rationale and subsequently take due regard of any representations made. The rationale and response to representations should be included in its published decision and this added to the drafting.

20. Do you agree that the proposed additions of conditions E14, as set out in Annex A, provide the right level of governance and industry engagement to ensure that the Project Designation Methodology is developed and modified in a robust manner?

Please provide the reasons for your answer.

Yes/ No No

We are concerned that the licence drafting only has provision for NESO or Ofgem to initiate changes. Whilst there is an obligation for NESO to consult, this could be interpreted to be limited to any specific change being consulted on. We think that some additional wording that NESO needs to have regard to issues that are raised by any party that is materially affected should be included. This would provide a route for third parties to raise issues and place a requirement on NESO to have due regard of them and publish its consideration, justifying where they deem no changes are action is necessary. Similarly, where NESO does consult on a change, then it should have an explicit obligation to at least consider the responses.

This would mitigate the risk for parties affected by not having the Methodologies under full open governance. Without this formal route to raise issues and have them considered, the only route for affected parties would be to lobby Ofgem to seek the instigation of the change. We think this works against the intention of defining the governance process in the licence.

Condition E15: Requirement to offer terms

21. Do you agree with the requirements that an application window as in paragraph 3.56 is practical and sufficient? Please provide the reason for your answer. What is the right maximum and/or minimum period prescribed in the licence for how long the application window should be open? Is the minimum requirement of at least once every year sufficient?



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Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

We are concerned that the minimum of a single application window is inadequate. We think that the licence should have a minimum of two application windows per annum. We could accept an explicit carve out to reduce this with Authority consent and think this would be a better outcome for customers.

We are concerned that the timing of offers being issued and allowing a period to accept and cascade to embedded customers might mean that there will not be sufficient clarity if there is only a single annual window.

We can see the merit in setting a minimum period for a window but less convinced about the maximum limit. The key benefit of windows is to allow the network modelling to take place with a static set of assumptions being applied and therefore it is the date that the window closes that is most important rather than the length of the window. A window longer than four weeks might be beneficial as it would allow some applicants to apply earlier and this would potentially allow the assessment of the criteria to be made over a longer period and therefore be more efficient overall.

22. Do you agree that 6 months as mentioned in paragraph 3.59 to provide an offer once the application window closes is adequate? Do you agree with our proposed option regarding timing for the NESO to make offers, or do you prefer any of the alternative options set out in paragraph 3.60? Are there any other options we should be considering? Please provide the reasons for your answer and suggest alternative.

Yes/ No Click or tap here to enter text.

We support the proposed approach as this gives certainty for customers.

We think that the "*unless otherwise agreed by the Authority*" in E15.14(c) is superfluous as the provision already exists in E15.10.

23. Do you agree with our proposed approach of specifying which type of applications get which type of offers as in paragraphs 3.52 to 3.55? Does this cover all type of applications?

Please provide the reason for your answer and mention if any type of applications is not captured in here.

Yes/ No No

We believe that the situation for embedded projects is not fully clear. This is compounded by the fact that these customers will have their contract with the DNO.

The two situations that need clarity are;

- 1) Existing projects that do not meet the Readiness Criteria
- 2) Existing and new projects that meet the Readiness Criteria but do not meet the Strategic Alignment Criteria.

24. Do you agree that the proposed legal text in condition E14, as set out in Annex A, meets the policy intent above?

Please provide the reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]



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Proposed Electricity Transmission Standard Licence Conditions

General approach to modification of the Electricity Transmission Standard Licence Conditions

25. Do you agree with our approach mentioned in paragraphs 4.1 to 4.3?

Please provide the reasons for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

26. Do you agree that we have considered all the areas of the licence which might need modifications?

Please provide the reasons for your answer and specify if you think we have missed some areas.

Yes/ No Click or tap here to enter text.

[Write your response here]

Section D: Transmission Owner Standard Conditions

Condition D1: Interpretation of Section D

27. Do you think any other modifications to definitions are required for the transmission licence in addition to the ones proposed for the System Operator Licence in paragraphs 3.12 to 3.19, in the consultation document?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

28. Do you agree that the proposed text in SLC D1, as set out in Annex B, meets the policy intent?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

29. Would you suggest any changes to the new and existing definitions in SLC D1 that are pertinent to Connections Reform?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

**Condition D4A: Obligations in relation to offers for connection etc.
(Transmission Owners)**

30. Do you agree with the policy intent and the rationale described in the paragraphs 4.6 to 4.10, in respect of the changes to SLC D4A.1, in the consultation document?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

31. Do you agree with the proposed changes to the text of SLC D4A.1, as set out in Annex B?

If you disagree or partially agree, please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

D4A.2- New proposed Paragraph 2 – requirements to offer terms requirements to offer to enter into agreement with the ISOP and provisions for that offer

32. Do you agree with the policy intent and the rationale for the proposed changes described in the paragraphs 4.11 to 4.13, in respect of the changes to SLC D4A.2, in the consultation document?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

33. Do you agree that the proposed changes to the text of the new paragraph 2 of SLC D4A, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

D4A.2, D4A.3, D4A.4, D4A.5- Proposed paragraphs 3, 4, 5 and 6 (formerly paragraphs 2, 3, 4 and 5)

34. Do you agree with the policy intent described in paragraph 4.17, in respect of the changes suggested in paragraphs 2, 3, 4 and 5, now amended to become paragraph 3, 4, 5 and 6, of SLC D4A, in the consultation document?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

35. Do you agree that the proposed changes to the text of the amended paragraph 3, 4, 5 and 6 of SLC D4A, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

Condition D16: Requirements of a connect and manage connection

36. Do you agree with the policy intent and the rationale in respect of the proposed changes to SLC D16 as described in paragraphs 4.19 to 4.23, in the consultation document?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

37. Do you agree that the proposed changes to the text of SLC D16, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

New Condition D18: Requirements to comply with connection network design methodology for Use of System and connection (Transmission Owners)

38. Do you agree with the policy intent behind the proposed new licence condition as explained in paragraphs 4.24 to 4.26, in respect to the proposed SLC D18, in the consultation document?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

39. Do you agree that the proposed text gives appropriate effect to the specific policy intent, as detailed in Annex B?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

Section E: Offshore Transmission Owner Standard Conditions

Condition E17: Obligations in relation to offers for connection etc. (Offshore Transmission Owners)

40. Do you agree with the policy intent and rationale in respect of the changes proposed to SLC E17, in paragraphs 4.28 to 4.34, in the consultation document?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

41. Do you agree that the proposed changes to the text in SLC E17, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

New Condition E25: Requirements to comply with connection network design methodology for Use of System and connection (Offshore Transmission Owners)

42. Do you agree with the policy intent behind the proposed new licence condition as explained in paragraph 4.35, in respect of the SLC E25, in the consultation document?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

43. Do you agree that the proposed text of the new condition, as detailed in Annex B, gives effect to the policy intent?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

[Write your response here]

Distribution Standard Licence Conditions – Policy Intent

Chapter 1: Interpretation and application

Condition 1: Definitions for the standard conditions

44. Do you agree that changes are likely be required to some of the definitions within licence condition 1?

Please provide the reasons for your answer.

Yes/ No Yes

We expect that some new definitions will be needed arising from the issues identified below.

Chapter 2: General obligations and arrangements

Condition 4: No abuse of the licensee's special position

45. Do you consider any modifications to licence condition 4 are required?

Please provide the reasons for your answer.

Yes/ No Yes

We think a change to include specific drafting to make explicitly clear that compliance with these new TMO4+ processes would not constitute discrimination is necessary. There are inherent differences in these processes (eg large embedded are assessed by NESO, Project Designation etc) such that there could be different treatments arising from these differences and these are outside a DNO's control.

Chapter 4: Arrangements for the provision of services

Condition 12: Requirement to offer terms for Use of System and connection

46. Do you agree with the policy intent to modify licence conditions 12.1 and 12.4 under both scenarios?

Please provide the reasons for your answer.

Yes/ No Yes

We agree that SLC 12 will need to change under either scenario. We also believe that changes to primary legislation may also be required.

Currently we have obligations under the Electricity Act (and its subsequent modifications) to connect and whilst there are some general exceptions in section 17, we do not consider them sufficient to cover the situation where we are not able to make a connection offer that contemplates a specific date of connection. We therefore think explicit criteria should be added to section 17 of the Electricity Act.

In addition, SLC 12 would need to alter. We think it needs to be altered such that the application of the Strategic Alignment Criteria in a way that does not give the application a firm connection date (and may never do so) would not be in breach of SLC 12.4.

In addition, we consider that there needs to be an express provision to the effect that in responding to a request for a connection, the licensee must comply with the Readiness and Strategic Alignment Criteria (or NESO's decision relating to the Strategic Alignment Criteria in the case of Scenario 1).

Condition 19. Prohibition of discrimination under Chapters 4 and 5

47. Do you agree with our view that no changes to licence condition 19 are necessary under any of the two scenarios?

If no or you partially agree, please provide the reasons for your answer.

Yes/ No No

We think that an express provision that states that complying with the TMO4+ processes does not result in discrimination is required. This is in particular in relation to the Strategic Alignment Criteria and exacerbated if Scenario 2 is implemented.

48. If you disagree, what kind of change to the licence condition 19 do you believe is necessary?

Please provide the reasons for your answer.

An explicit exemption that complying with the TMO4+ processes does not constitute discrimination.

Chapter 5: Industry codes and agreements

Condition 20. Compliance with Core Industry Documents

49. Do you see any risk related to introducing an obligation for DCUSA licensees to comply with the Clean Power 2030 Action Plan and SSEP?

Please provide the reasons for your answer.

Yes/ No Yes

Only one of these documents currently exists and is very general and lacks any specific requirements for DNOs to comply with, therefore it is unclear how DNOs would comply.

The SSEP does not exist yet and therefore agreeing to comply with an unseen document would impose unacceptable risk to DNOs.

We think an overarching obligation as described in our response to Question 45 would suffice.

50. Do you agree with the changes suggested to licence condition 20?

If no or you partially agree, please provide the reasons for your answer.

Yes/ No No

The purpose of both documents is to set the thresholds for the Strategic Alignment Criteria and therefore direct compliance is unnecessary. We think an overarching obligation as described in our response to Question 45 would suffice.

Condition 12A. Requirement to progress User applications into the Gated Window process

51. Do you agree with the proposal to define a new licence condition 12A.1 – requirement to perform “Gate 2” checks in line with the NESO methodology?

Please provide the reasons for your answer.

Yes/ No No

We note that the proposed drafting of changes to CUSC arising from CMP 434 and 435 introduce new obligations on DNOs and therefore will form new obligations via SLC 20 obligation to comply with industry codes.

We therefore think that an overarching obligation to comply with TMO4+ processes would be helpful in providing clarity. We think that adding such specific obligations as proposed introduces a duplication of obligations and a disproportionate new obligation whereby a single instance could constitute a 10% of turnover penalty.

52. Do you agree with the proposal to define a new licence condition 12A.2 – requirement to perform “Gate 2” checks in a timely manner? If so, do you consider the approach to the condition should be principles-based or prescriptive?

Please provide any information / evidence you can to support your response.

Yes/ No No

Similar to our response to question 52, we think that this is a duplications and a disproportionate obligation. The CMP 434 drafting sets out specific timescales for DNOs to undertake certain activities with five and 15 working days of the window closing. The introduction of an additional new obligation with no such specific timescales leaves it open to interpretation as to whether compliance with the proposed CUSC timescales meets a “timely manner” obligation or not.

New Conditions

New Conditions 12A.3 and 12A.4 - Submission of projects for transmission assessment

53. Do you agree with the proposal to define new licence conditions 12A.3 and 12A.4 – this would introduce a requirement to submit projects for transmission assessment within a timely manner?

Please provide any information / evidence you can to support your response.

Yes/ No Click or tap here to enter text.

Similar to our response to question 52, we think that this is a duplication and a disproportionate obligation. The CMP 434 drafting sets out specific timescales for DNOs to undertake certain activities with five and 15 working days of the window closing. The introduction of an additional new obligation with no such specific timescales leaves it open to interpretation as to whether compliance with the proposed CUSC timescales meets a “timely manner” obligation or not.

Proposed Electricity Transmission Special Licence Conditions

54. Do you think any Electricity Transmission Special Licence Conditions changes are required?

If you think that changes are required, please provide the reasons for your answer.

[Write response answer here]

Proposed Electricity Distribution Special Licence Conditions

55. Do you think any Electricity Interconnector Standard Licence Conditions changes are required?

If you think that changes are required, please provide the reasons for your answer.

We presume that there is an error in Question 55 and it should relate to Electricity Distribution Special Licence Conditions. On that basis, we do not think any changes are required.

Proposed Electricity Interconnector Standard Licence Conditions

56. Do you think any Electricity Interconnector Standard Licence Conditions changes are required?

If you think that changes are required, please provide the reasons for your answer.

[Write your response here]

Proposed Electricity Generation Standard Licence Conditions

57. Do you think any Electricity Generation Standard Licence Conditions changes are required?

If you think that changes are required, please provide the reasons for your answer.

[Write your response here]



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General feedback

We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:

Do you have any comments about the overall process of this consultation?

Do you have any comments about its tone and content?

Was it easy to read and understand? Or could it have been better written?

Were its conclusions balanced?

Did it make reasoned recommendations for improvement?

Any further comments?

[Write your response here]