

By email only to: [aldasair.macmillan@ofgem.gov.uk](mailto:aldasair.macmillan@ofgem.gov.uk)

12 February 2025

Dear Alasdair,

## **Connections end-to-end review of the regulatory framework**

Thank you for the opportunity to respond to the above consultation. This response is on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc (EPN), London Power Networks plc (LPN), and South Eastern Power Networks plc (SPN).

### **Connections to the distribution system are key to delivering net zero**

Based on the Government's Clean Power 2030 Action Plan, distribution networks will connect c. 60% of the renewable generation and storage required to help meet the goal of Clean Power by 2030. It is with this in mind that we fully support this review and are committed to delivering the improvements it seeks to achieve for all connections customers across Great Britain.

### **Harness the power of incentives based on customer satisfaction to drive real improvements that are naturally aligned to customers' wants and needs**

The RIIO framework has successfully proven that incentives lead to genuine, measurable improvements in service for customers. This was particularly apparent in RIIO-ED1 where strong, well-defined incentives led to step changes in performance through mechanisms such as the Broad Measure of Customer Satisfaction (BMoCS) which applied to smaller connections – UK Power Networks increased its BMoCS score by 13% to 94% over the RIIO-ED1 price control. Other mechanisms such as minimum standards risk only “freezing” performance at standards currently considered to be acceptable. They do not encourage companies to explore the art of the possible and deliver continuous improvement based on evolving customer and stakeholder feedback. It is crucial therefore that regulatory mechanisms that measure and reward improvements across a broad spectrum of customer experience are present. These arrangements will keep companies responsive to changes in customer priorities without the need for regulatory adjustments to arrangements.

We have proposed in our RIIO-ED3 framework consultation response, a thoroughly revamped Major Connections Customer Satisfaction Survey (MCCSS) incentive for RIIO-ED3. This should be broadened and significantly strengthened compared to the current RIIO-ED2 mechanism as we believe this will give good coverage of the areas identified in this consultation and achieve the aims we state above. Our view is that the revamped MCCSS should:

- measure all connections customers not included in the current BMoCS;
- be symmetrical (not downside only);
- be high powered – i.e. circa 1% of RoRE;
- segment demand and generation customers, as well as LCT customers; and
- measure customer satisfaction with delivery timescales.



### **The issues identified in the consultation need to be kept in context**

We recognise many of the issues raised in the consultation as concerns occasionally raised by some customers seeking connections to the electricity system in Great Britain. However, it is important to keep these issues in context. UK Power Networks had over 70,000 customer enquiries relating to connections to the network last year. The vast majority of these fully met customers' expectations leading to excellent customer satisfaction as demonstrated by our overall customer satisfaction score of over 90%. This demonstrates that, whilst issues do occur, they are the exception, not the rule. By taking an approach that seeks to implement separate mechanisms to directly address each issue individually, as suggested by the multiple proposals under each theme, we risk them being fragmented, inflexible and potentially leading to unintended consequences. A broader incentive mechanism would avoid this.

### **We need to remain mindful that most connections market segments have well-established competition at distribution level**

Last year, c. 75% of the capacity connected by larger customers (i.e. Major Connections) in our licence areas was delivered by competitive providers. This demonstrates the success of the work carried out by Ofgem, the DNOs and other stakeholders to foster a competitive market for connections in Great Britain. It is also important to remember that this means customers have real choice in who delivers their connection which in itself will drive innovation and efficiency in the marketplace. Any new arrangements introduced need to be mindful of this and ensure a level playing field rather than creating new market distortions. Notwithstanding this, we understand that we, as a DNO, still have a critical overall role to play in the connections market and are committed to delivering improvements, including where we provide a service to the independent connection providers and independent DNOs. This will naturally improve the experience of all customers.

The table below provides some high-level views against the themes identified in the consultation document.

Theme	UK Power Networks' High-level View
Visibility and accuracy of connections data	<ul style="list-style-type: none"><li>• We are aware of the importance of accurate data and its usefulness to our customers.</li><li>• In general, we agree that there could be improvements in overall quality and consistency of data regarding connections.</li><li>• It is critical that any regulatory mechanisms introduced are proportionate and factor in the outcome of engagement to fully understand the requirements of connecting customers.</li></ul>
Improved standards of service across the customer journey	<ul style="list-style-type: none"><li>• We agree with Ofgem that industry should pursue greater consistency of experience for customers on their connections journey, where this is appropriate. This consistency could be explored through industry working groups which we support.</li><li>• Different requests and customer types necessarily mean that some aspects of the customer journey must be bespoke.</li><li>• Connection providers need to be able to respond to the needs and preferences of their connecting customers.</li><li>• Instead of time-bound regulatory mechanisms as proposed, we believe that a mechanism based on customer satisfaction would avoid the unintended consequence where time pressure that is not coming from the customer is driving outcomes.</li></ul>

Requirement on networks to meet connection dates	<ul style="list-style-type: none"> <li>• The GSoPs mechanism already exists to address network companies meeting connections dates.</li> <li>• We accept these may not be exhaustive in covering the desired areas within this theme, however use of a financial instrument risks increasing the cost for connecting customers as potential losses under this instrument must be priced in to ensure connections charges remain cost reflective.</li> <li>• We believe the strongest indicator of how well customer expectations are met is through directly surveying them and incentivising customer satisfaction.</li> </ul>
Quality of connection offers and associated documentation	<ul style="list-style-type: none"> <li>• As with theme 2, we support greater consistency in connection offers where possible.</li> <li>• It is not clear, however, how the proposed mechanisms would operate, particularly noting that connection offers require a large amount of bespoke content.</li> <li>• Rather than regulating on inputs, this is a prime area where an output measure for satisfaction should be set and the DNOs given the incentive to innovate.</li> </ul>
Ambition of connection offers	<ul style="list-style-type: none"> <li>• We agree with the content of this theme in principle, however we have some minor concerns with the proposals as currently written which we explain in our full response below.</li> <li>• Noting that the end-to-end proposals represent very early-stage proposals, we are keen to work with Ofgem to improve the ambition of connection offers.</li> </ul>
Minor connections	<ul style="list-style-type: none"> <li>• We support reform in this area, particularly considering the importance to Low Carbon Technology (LCT) installations.</li> <li>• We believe a fourth category should be added to the Broad Measure of Customer Satisfaction incentive to cover the works under this theme.</li> </ul>
Provisions and guidance for determinations	<ul style="list-style-type: none"> <li>• We support the proposals in this theme and have no further comments at a high level.</li> </ul>

As well as the above, we also note that, in general, we prefer prescriptive licensing rather than the introduction of principles-based licence conditions. This way, there is little confusion between licensees and involved stakeholders as to the exact obligations of the licensee and licensees can clearly demonstrate compliance to the Authority.

We are keen to continue to engage with Ofgem throughout the connections reform process and would welcome the opportunity to discuss our response further. As the RIIO-ED3 price control is already underway, we believe there would be merit in Ofgem exploring how the development of the proposals from the end-to-end review could be aligned with RIIO-ED3 development. This will ensure that the final policy positions are well integrated and proportionate in the wider context of the regulatory framework and provide genuine value to customers.

We propose that industry working groups, similar to those used for price control development, should be set up to further develop the proposals in the end-to-end review. These working groups should be formally aligned with RIIO-ED3 and the wider regulatory framework and allow all key stakeholders to discuss the proposals in-depth. Our preference would be for these working groups, and by extension the end-to-end proposals, to be fully embedded into the RIIO-ED3 scope. This

would ensure proper alignment and an embedded set of regulatory arrangements for connections and could still see improvements implemented ahead of the start of the RII0-ED3 period through a separate, earlier decision process, noting that Ofgem's Sector Specific Methodology Decision is expected to be published in June 2026. We would welcome the opportunity to explore this further with Ofgem and industry.

In summary, based on our market experience and customer engagement, we believe that the key changes needed in the connections arena that would make the biggest difference in driving better service are:

- An overhaul of the MCCSS to measure all connections customers not included in the BMoCS above. The incentive should be symmetrical (not downside only). It should be high powered – i.e. circa 1% of RoRE. It should segment demand and generation customers, as well as LCT customers.
- Creating a fourth category in the Broad Measure of Customer Satisfaction to cover small works associated with customers connecting LCTs (i.e. works under the scope of Theme 6).
- These proposals, alongside others from responses to this consultation, should be discussed through working groups established to bring all stakeholders together to agree the most effective approach to achieving the goals stated in this consultation.

You can find our response to the consultation / call for input questions in the appendix to this letter. If you have any questions regarding our response, please do not hesitate to get in touch.

Yours sincerely,



**Mark Adolphus**

Director of Connections and Sustainability, UK Power Networks

Copy: Suleman Alli, Director of Finance, Customer Service and Technology, UK Power Networks  
James Hope, Head of Regulation & Regulatory Finance, UK Power Networks  
Ross Thompson, Head of Commercial Services, UK Power Networks

## Appendix: Response to Consultation Questions

Our responses should be read in conjunction with the Energy Networks Association response which we have contributed to and support.

### Theme 1 - Visibility and accuracy of connections data and network capacity

**Question 1a. Do you agree with the issues we have set out under Theme 1 - Visibility and accuracy of connections data and network capacity? Are there any other issues under this theme that we should consider or be aware of?**

We carry out extensive stakeholder and customer engagement both specifically on the theme of connections and on our wider programme of Open Data. Through this engagement we have built a good understanding of what our customers expect from us in terms of connections related data and information and the issues raised under this theme align with this picture. We have worked extensively to triage the requests of our customers and, on the basis the request is justified and commercial or security sensitivities can be addressed, make the data openly available through our Open Data Portal. Specifically, we were one of the first DNOs to publish our digital view of our connections pipeline openly. Our work to make data open is an ongoing process and we continue to triage new requests and make more data available to customers and stakeholders. In addition to this, we are exploring options for providing greater transparency of the connections pipeline against the Clean Power 2030 allocations. We intend to develop new tools in this area while being mindful of the confidentiality of the underlying data.

We are not aware of any other issues under this theme.

**Question 1b. Do you agree with proposal 1a (new regulatory requirement on single digital view tools)? Do you have any views on how this should be implemented?**

We have combined our responses to question 1b, 1c and 1d under question 1d below.

**Question 1c. Do you agree with proposal 1b (new regulatory requirement on the creation of guidance / standards for data visualisation tools)? Do you have any views on how this should be implemented?**

We have combined our responses to question 1b, 1c and 1d under question 1d below.

**Question 1d. Do you agree with proposal 1c (new regulatory requirement to provide connections data)? Do you have any views on how this should be implemented?**

We agree that having regulation and guidance can help drive consistency of available data. There are already a multitude of regulatory requirements and associated guidance which cover the areas of capacity, forecast demand and headroom such as:

- Long Term Development Statement
- Network Development Plan
- Load Index
- Smart Optimisation Output
- Data Best Practice Guidance

These existing requirements themselves already have considerable overlap so we would encourage any new requirements to be considered in the context of the wider regulatory

landscape. There could be merit in exploring a wider review of these requirements to rationalise the publications and make things simpler for customers and stakeholders.

**Question 1e. What are your views on the completeness and discoverability of connections data that would be useful to you? Are the existing resources clear and transparent?**

We continuously engage with stakeholders to better understand their views in this area including promoting and seeking feedback on our Open Data Portal through our Connections engagement events. We believe we are keeping pace with customer expectations and welcome any new insight that will be available from the wider responses to this consultation.

**Question 1f. Is there additional connections data that would be of use but legal barriers prevent it from being published? If so, do you consider that there are solutions that would enable this data to be made available, for example by aggregating it to appropriate levels / anonymising it etc.**

An assessment of legal barriers and commercial/market confidentiality is a core part of the triage process we employ before making any data openly available. While in rare circumstances this means we are not able to publish exactly what has been requested, we are often able to take steps to mitigate the risk and publish data or information with similar stakeholder benefit.

**Question 1g. Is there anything else regarding Theme 1 – Visibility and accuracy of connections data and network capacity that you consider we have missed?**

No, we have not identified any missing aspects to Theme 1 at this stage.

**Theme 2 - Improved standards of service across the customer journey (not including “minor connections”)**

**Question 2a. Do you agree with the issues we have set out under Theme 2 - Improved standards of service across the customer journey (not including “minor connections”)? Are there any other issues under this theme that we should consider or be aware of?**

Currently, UK Power Networks carry out extensive engagement with our customers to ensure that standards of service are constantly evolving to meet the needs of customers across the entire customer journey. Through this engagement we aim to identify customer requirements and implement them wherever possible. This engagement process and ever-evolving standards of customer service are fundamental to how we continue to achieve industry-leading customer satisfaction scores.

We have not identified any additional issues under this theme.

**Question 2b. Do you have any views on proposal 2a (general principles-based licence condition and supporting guidance around standards of service throughout the entire customer journey)? Do you have any views on how this could be implemented?**

Our opinion is that the issues raised in Theme 2 would be better addressed by the strengthened MCCSS noted in our cover letter and our response to Ofgem’s RIIO-ED3 Framework Consultation. The strengthened MCCSS would cover all elements of the customer journey, whereas it is possible a general principles-based licence condition could leave key areas open to interpretation. It is our view that the strengthened MCCSS would also be better placed to adapt to changing customer needs, both across the individual customer journey and as industry evolves towards Net Zero. This



ensures innovation continues to be incentivised, rather than potentially stifled as noted in the ENA response to this question.

Furthermore, one of the major difficulties with principles-based licence conditions is the difficulty for companies to demonstrate compliance, ultimately leaving the exact obligations of both parties open to some degree of interpretation. Having an incentive based on customer views of service received removes this ambiguity – companies will be rewarded or penalised based exactly on the service they have given customers – and removes the difficulty of having to test / prove compliance with a non-prescriptive licence condition.

**Question 2c. Do you have any views on proposal 2b (new prescriptive condition(s) around standards of service)? Do you have any proposals for any specific areas of the connections customer journey that should be subject to such a requirement?**

We generally support prescriptive licence conditions, on the basis that they should be outputs-based rather than inputs-based. In this context, this means basing conditions on customer satisfaction rather than process inputs such as timeframes. Many areas of the connections process are necessarily bespoke to the individual customer journey, meaning any licence condition based on inputs would have to be extremely broad to the point of being difficult and inconsistent to apply.

A focus on customer satisfaction further avoids the issue of standards freezing at the prescribed level. Incentivising companies to focus on constantly improving the customer experience should ensure that underlying processes are improving to meet expectations.

The vast majority of connections jobs progress well and without any issues brought to the attention of Ofgem. Those few that do reach the attention of Ofgem should be put into context of the wider performance in the connections sphere. Nevertheless, we agree that there is some merit in exploring issues raised by customers through the RIIO-style connections working groups proposed in our cover letter.

**Question 2d. Do you consider that any of the existing standards of service requirements set out in the regulatory framework for provision of specific products / services should be revised or removed? Do you consider that there is any duplication or overlap of regulatory requirements across the regulatory framework that needs addressed?**

As noted in our cover letter, we believe the MCCSS should be revised and significantly strengthened. The revamped MCCSS should:

- Measure all connections customers not included in the current BMoCS;
- Be symmetrical (not downside only);
- Be high powered – i.e. circa 1% of RoRE;
- Segment demand and generation customers, as well as LCT customers; and
- Measure customer satisfaction with delivery timescales.

For completeness, a summary of our reasons for this noted in our cover letter can be found below:

- The RIIO framework has successfully proven that incentives lead to genuine, measurable improvements in service for customers;
- Powerful incentives based on customer satisfaction drive real improvements that are naturally aligned to customers' wants and needs;
- Mechanisms based on minimum standards risk freezing industry practices at a contemporary view of what is acceptable; and

- Customer satisfaction mechanisms keep companies responsive to changes in customer priorities without the need for regulatory adjustments to arrangements.

**Question 2e. Is there anything else regarding Theme 2 – Improved standards of service across the customer journey (not including “minor connections”) that you consider we have missed?**

No, we have not identified any missing aspects to Theme 2 at this stage.

### **Theme 3 - Requirement on networks to meet connection dates in connection agreements**

**Question 3a. Do you agree with the issues we have set out under Theme 3 -Requirement on networks to meet connection dates in connection agreements? Are there any other issues under this theme that we should consider or be aware of?**

We consider that the high customer satisfaction scores demonstrate that there are not systemic issues with DNOs failing to meet customer expectations for connections timescales. This is a fundamental aspect of the connections process and if DNOs were consistently failing to meet customer expectations in this area we would expect to see this reflected in customer satisfaction scores. We do not see this in the current high customer satisfaction scores awarded to UK Power Networks and other DNOs.

We nevertheless do appreciate that there may be some customers in the process who do not feel like their expectations have been met with regards to connection dates in connections agreements. However, as stated in our response to an earlier question, the vast majority of connections jobs progress well and the needs of the customer are indeed met. The examples where this is not the case are almost certainly isolated ones, nonetheless we are committed to tackling these wherever possible. It is therefore important that any regulatory mechanisms are done so with this context in mind.

The exception to this is projects with particularly long timescales driven principally by issues with transmission constraints, where Connections Reform is being implemented to unblock those projects ready to proceed.

**Question 3b. Do you have any views on proposal 3a (strengthened principles-based licence condition around meeting connections dates)? Do you have any views on specific wording that would achieve the intended outcome?**

We do not believe a principles-based licence condition is the most appropriate approach to achieving improvements in this area. There are numerous factors which influence the connections date a customer receives, often these are individual to each customer as connections processes are necessarily different for each project. Some of the factors involved are also not within the control of the network company. Introducing a principles-based licence condition around meeting connections dates therefore risks being very subjective and leaving networks at fault for factors beyond their control.

We consider a better way to measure how closely we have met customer expectations is through a direct measure of customer satisfaction. This would be covered by our suggestion to expand and strengthen the MCCSS. Connecting customers who have not had their connections date met through subpar practice would reflect this in their satisfaction scores. This would, therefore, directly incentivise companies to continue to deliver connections in timescales that meet customer



expectations. For detail on our proposal to expand the MCCSS, please refer to our cover letter and our response to Question 2d.

**Question 3c. Do you have any views on proposal 3b (minimum standards / SLAs around meeting connections dates)? Do you have any views on specific standards that could be introduced and how they would work in practice?**

There is already a regulatory mechanism that achieves this through Guaranteed Standards of Performance to meet agreed connection dates. We have not seen any evidence that the current arrangements are not appropriate.

Further, we believe that minimum standards risk freezing performance at levels which are acceptable when the standards are set. It is our view that our suggestion to expand the MCCSS would provide utility in this area as measuring satisfaction allows adaptability to specific and ever-changing customer needs, meaning that DNOs are incentivised to continuously improve in areas that are the most important to their customers.

**Question 3d. Do you have any views on proposal 3c (a financial instrument designed to offer recourse to connecting customers who face detriment due to delays)? Do you have any views on how this should be implemented?**

We would need to see further detail of this before being able to provide a clear view, at present the mechanism proposed is not clear. Broadly, however, it is important that any arrangement must be calibrated correctly as this financial instrument has the potential to increase the cost of connections for all connections customers. The introduction of an additional financial instrument risks exposing the regulated party to disproportionate financial detriment. These new costs and risks would therefore have to be factored into connections charges. It is also important to remember that the connection to the network is to facilitate the customer's wider project. These projects are often complex programmes themselves which can be subject to serial delays and complications on the customer side. DNOs will work with customers to accommodate this and support any re-programming of works required.

**Question 3e. Is there anything else regarding Theme 3 - Requirement on networks to meet connection dates in connection agreements that you consider we have missed?**

No, we have not identified any missing aspects to Theme 3 at this stage.

**Theme 4 - Quality of connection offers and associated documentation**

**Question 4a. Do you agree with the issues we have set out under Theme 4 - Quality of connection offers and associated documentation? Are there any other issues under this theme that we should consider or be aware of?**

We are acutely aware of the importance placed by customers on receiving high quality accurate information in their quotes. We therefore agree that Ofgem is correct when it highlights that a trade-off exists between time taken to issue an offer and the quality of the offer. However, we do not believe there are significant issues in this area. Our MCCSS quote score for 2024 was over 90% and this score includes our customers' views of the quality of the connections offers. This indicates that customers are generally happy with the quality of the quotes that they are receiving.

**Question 4b. Do you have any views on proposal 4a (principles-based licence condition on the completeness / quality of the offer and supporting documentation)? Do you have any views on specific wording that would achieve the intended outcome?**

Similarly to our answer to question 3b, we do not believe a principles-based licence condition is the best approach when regulating the quality of connections offers. Individual connections projects often vary significantly from each other and the overall spectrum of connections projects is wide, from small domestic connections to large generation and storage connections with flexibility and curtailment. This means that defining principles would be difficult and measuring compliance against these principles in a consistent and useful way would be even more challenging.

We believe that a better measure of how companies have adapted the information provided in the quote to match a customer's requirements is by using a customer satisfaction metric. As noted in our answer to question 3b, subpar performance in this area would see companies receiving lower satisfaction scores. We therefore consider our proposed expansion and strengthening of the MCCSS to be the most appropriate way to regulate this area. Please refer to the cover letter and our answers to previous questions for more detail on this.

**Question 4c. Do you have any views on proposal 4b (minimum standards / SLAs on the completeness / quality of the offer and supporting documentation)? Do you have any views on specific standards that could be introduced and how they would work in practice?**

As noted in our response to previous questions, we believe minimum standards risk freezing performance at levels currently considered acceptable. We also consider that it will be difficult to define appropriate standards owing to the range of connections projects that network companies see.

Again, as with our response to a number of the other questions in this consultation, we believe that our proposal of an expanded and strengthened MCCSS is the most appropriate way to regulate this area. Please refer to the cover letter and our answers to previous questions for more detail on this.

**Question 4d. What do you consider would constitute a 'high quality offer'?**

Owing to the range of connections projects and the individual connections journey each customer goes on, what constitutes a 'high quality offer' will be extremely customer specific. We engage with customers regularly to seek feedback and build this into our quoting process, ensuring customers get the highest quality offer possible. An example of this is the self-service tool that we developed for flexible connections customers to provide better clarity on their potential curtailment.

We look forward to any further insight from customers that may be gained from responses to this consultation.

**Question 4e. Is there anything else regarding Theme 4 - Quality of connection offers and associated documentation that you consider we have missed?**

No, we have not identified any missing aspects to Theme 4 at this stage.

## **Theme 5 – Ambition of connection offers**

**Question 5a. Do you agree with the issues we have set out under Theme 5 - Ambition of connection offers? Are there any other issues under this theme that we should consider or be aware of?**

We agree with Ofgem and understand firsthand that it is extremely important to customers that companies meet their expectations with regard to connections dates. Again, however, we do not believe there is evidence of a systemic failure by DNOs to meet customers' expectations in this area.

**Question 5b. Do you have any views on proposal 5a (strengthened principles-based licence condition around offering earliest achievable connection dates)? Do you have any views on specific wording that would achieve the intended outcome?**

We consider that the proposed mechanism as currently worded could be problematic, particularly because of the phrase "earliest achievable date". If interpreted literally, this could be taken to mean that companies must provide their customers with the absolute earliest connection without any consideration as to what is reasonable and with zero tolerance for delay in any situation. This would obviously lead to inefficiencies and could be interpreted as a requirement that DNOs spare no expense in order to remain compliant. These inefficiencies would ultimately be passed down to the end consumer. There must be some measure of reasonableness to avoid this.

This proposal is also particularly problematic when combined with proposal 3c, meaning companies must set unrealistic connection dates and strong penalties for not achieving those dates.

We believe our proposal of a strengthened MCCSS would cover this most appropriately. As noted previously, the strengthened MCCSS is a true measure of how well we have matched our customers' expectations and by design would cover the whole connections process. Please refer to the cover letter and our answers to previous questions for more detail on this.

**Question 5c. Is there anything else regarding Theme 5 - Ambition of connection offers that you consider we have missed?**

No, we have not identified any missing aspects to Theme 5 at this stage.

## **Theme 6 – Minor connections**

**Question 6a – Do you agree with the issues we have identified? Are there any other issues under this theme that we should consider? Please provide data and evidence to support your views if possible.**

One of our core principles is ensuring we are not a blocker to the country achieving net zero. As such, we fully acknowledge that we play an important role in our customers' journey to decarbonisation of their heat, transport and generating low carbon power. We do accept that there are factors, often outside of the DNOs' control, that can cause delays to the necessary work being carried out such as gaining access to properties when providing installations or unlooping.

Both UKPN and the ENA have undertaken extensive work to smooth the process of adopting low carbon technology and embedding our role in that process to be as smooth as possible, for example through our work on Fuse Upgrades and Connect Direct. Over 80% of applications for

domestic low carbon technologies into UK Power Networks are now auto-approved within minutes through our Smart Connect portal.

**Question 6b – What are your views on our proposals designed to address these issues? Are there other proposals you consider would achieve the intended outcomes?**

To address this, we believe that the BMoCS could be expanded to include a fourth category focused on Low Carbon Technology (LCT) adoption. This would include all general enquiries and connection customers that are related to LCTs. We already report on this metric in RIIO-ED2 so inclusion into the BMoCS to make this area directly incentivised should be a simple but significant addition to ensure these customers are receiving the same high levels of service. We believe this mechanism would achieve the same outcomes being sought by Ofgem's proposals or mechanisms focused on timescales, but with a focus on outputs rather than inputs thus ensuring the focus remains on what is important to the customer journey.

Please see the ENA response for feedback on the other specific proposals in the consultation – we support this response.

**Question 6c – Do you have views on how poor performance could be addressed under these proposals to ensure the smallest scale customers are protected and LCT roll out is supported?**

Our proposal regarding expanding the BMCS would naturally address subpar performance by incentivising companies to perform in areas which are important to the connecting customer. Unlike minimum standards, this ensures performance keeps pace with changing customer expectations and industry landscape and that the definition of good performance continues to evolve. Please see our responses to previous questions for further information on our BMCS proposal.

**Theme 7 - Provisions and guidance for determinations**

**Question 7a. Do you agree with the issues we have set out under Theme 7 - Provisions and guidance for determinations? Are there any other issues under this theme that we should consider or be aware of?**

We agree with the issues identified by Ofgem under this theme. We recognise that customers need a route to seek recourse however determinations are very resource intensive and should only be sought where the issue is significant and there is not another route for resolution.

**Question 7b. Do you have any views on proposal 7a (Ofgem to review the guidance for connection determinations)?**

We support this proposal. We believe this proposal could help customers to find the right route to seek resolution while negating the need to commit significant resource where this might be inefficient.

**Question 7c. Is there anything else regarding Theme 7 - Provisions and guidance for determinations?**

No, we have not identified any missing aspects to Theme 7 at this stage.