**Ofgem: Connections end-to-end review consultation (deadline 12 Feb 2025)**

[**Connections end-to-end review of the regulatory framework | Ofgem**](https://www.ofgem.gov.uk/consultation/connections-end-end-review-regulatory-framework)

**Responses to** [**connections@ofgem.gov.uk**](mailto:connections@ofgem.gov.uk)

**Port of London Authority Approach:**

The PLA has considered the proposals based on our current and future needs as a small operator, investor and promoter of Net Zero transition on the river.

Overall the PLA is supportive of this reform, but question how the costs of SLA standards will be met and whether it will shift focus towards meeting services standards will detract from the actual work of the DNO.

**Port of London Authority Responses:**

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

**Answer:**

*We assume that this would take a form that is similar to the National Planning Portal, though appreciate it would be more complicated from a power point of view.*

*Enabling access to view the queue would likely stimulate proactivity from the medium and big developers, rather than the smaller enterprises.*

*There is currently only a low cost to reserve connections, if these were higher it would be off-putting to people holding onto this capacity.*

*It would be useful to see timescales of project progress, or length of queue, to see how far a project is along the queue.*

*In terms of display, some substations have more capacity than others, it would be useful to show the capacity at each – current and planned.*

*Currently it’s possible to pay and run searches to see what voltage cables are in the ground. It would be useful to have a GIS-based system, showing what is available each day, to help project managers understand the costs involved in running cable from different locations.*

*Different areas of the country have different DNOs. It would be helpful to have something that encourages collaboration between different DNOs e.g. if there is s substation that is in a different jurisdiction with preferable proximity, could the system show preference to connect via that route?*

**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?
* 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?
* Consultation – Connections end-to-end review – consultation
* 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?
* 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?
* 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?

**Answer**

*2b is stronger than 2A – as there are consequences of good or poor performance.*

*A league table or reference points between the DNOs might be useful but there will need to be fair treatment of KPIs (as some will have smaller requests that are more chunky).*

*With penalties, this could lead to increased costs which need to be funded from somewhere. There is also a risk to setting standards that become a stick rather than a carrot – SLAs need to be realistic, and loopholes for taking advantage need to be reduced.*

**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?
* 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?
* 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?
* 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?
* 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?

**Answer**

*The PLA has had direct experience of this. The timeline for connection date being live is critical. Without power it means projects can be stopped entirely. We would expect dates to be committed to. However, we have concerns that applying large financial penalties could get passed onto the customer.*

*Each DNO has a license to run the network, so if they don’t deliver, who else is going to pick this up? There is no competition so having a principles-based piece doesn’t have enough weight.*

*Have they considered opening out the competition so that all DNOs bid for work regardless of location? It is recognised that this may be too complex to actualise, especially in the short term.*

**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?
* 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?
* 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?
* Question 4d. What do you consider would constitute a ‘high quality offer’?
* Question 4e. Is there anything else regarding Theme 4 - Quality of connection offers
* and associated documentation that you consider we have missed?

**Answer**

*How will this be monitored without oversight from within an organisation or oversight from the regulator? It could end up being a box-ticking exercise. The information DNOs ask for in proforma doesn’t allow for much detail, so site visits tend to take place over documented information. The form is simple, and therefore the quality of the response can only respond to this. Representatives of DNOs usually visit the site and walk the routes and in our experience this takes weeks rather than months. However, this only takes place once you have reached and met the offer stage, so is there support that could be given ahead of that?*

*The associated workload will be contingent on demand in an area, so how will this pan out for individual teams if there is more uptake in an area? Technical considerations can be hugely complex, and therefore take time. Having good relationships with the representatives and therefore having local knowledge and being contactable are the key factors helping the quality of connection offers.*

*The most useful elements are understanding the process and what things should be considered i.e. what information is required at different stages. At present the form isn’t very sophisticated, and this means that different issues will always emerge.*

*Another useful thing would be to know who to speak to if there are systems errors, e.g. where flow stages haven’t been updated on the central system (we have had an example of this). Having a dedicated case manager helps here.*

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

**Answer:**

*Target dates are passed to decision-makers in organisations so it’s critical that connection dates are realistic rather than optimistic. We would prefer to have a date and stick to it. We recognise though that for larger projects, there is less accuracy on long-range dates.*

**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.
* 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?
* 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?

**Answer:**

*We agree that changes need to be made but more bureaucracy and service standards adds costs and delays and possibly unintended consequences – more focus on SLA than actually doing the job.*

*The costs will be met via higher electrification process. What stepping stones could be made so encourage evolution rather than revolution?*

*Would incentive payments work – those that can afford to pay for a better service / timescales guarantees, do so? This would create an income stream to develop resources/capacity.*

**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?
* Question 7b. Do you have any views on proposal 7a (Ofgem to review the guidance for
* connection determinations)?
* Question 7c. Is there anything else regarding Theme 7 - Provisions and guidance for
* determinations?

**Answer**

*How many third party connection requests are there and what are the DNOs doing to meet those requests?*

*We assume Ofgem would be playing a role in ensuring compliance.*

**RIIO T3 – Electricity Transmission Network Incentivisation**

* Question 8a - What are your thoughts on each of the three ideas we have presented?
* In your response, please identify positives and negatives you see in each of the
* proposals, and if you have a favoured option and why that is.
* Question 8b - With reference to our Future Considerations, do you have any further
* ideas on how TOs could be incentivised through a financial penalty and reward model, to
* deliver faster connections times, a more effective overall connections process in RIIOET3 and drive behaviours that have a positive long-term impact on the network

**Answer**

*TBD*

**Appendix 1**

**Context notes:**

* Queue is oversubscribed, and rate of growth and mix of energy technologies don’t align with GB future energy needs e.g. far more storage and solar than is likely to be needed.
* Decarbonisation = high demand
* Renewable generation and grid connections
* Connection rates (wait times) are various – av more than 5 years 2030sa and beyond – too late
* Queue = 730 GW across transmission and distribution – growing all the time
* NESO advice to gov on pathways to deliver clean power needs 200-225 GW of generation project connected by 2030
* ‘Connect and manage’ stimulated access and investment in renewables, but network infra has not kept pace with volume, project then held up by volume of projects and by wider enforcement needed.
* ‘First come first served’ with low queue entry requirements, All leads to delays.
* Connection Action Plan (CAP) aims to reduce connections timescales.
* In order to achieve this the CAP set out actions across six key action areas:
  + 1 - Raise entry requirements
  + 2 - Remove stalled projects
  + 3 - Better utilise network capacity
  + 4 - Better allocated available network capacity
  + 5 - Improve data and processes, and sharpen incentives and obligations
  + 6 - Develop longer term connections process models aligned with strategic planning and market reform.

Target Model Option 4 – the name given to NESO’s electricity connections process reform

Aims to produce a streamlined queue of ready projects and align the connection process with the first Strategic Spatial Energy Plan (SSEP)

Accordingly, there are now four important aspects to the TMO4+ proposal:

• The introduction of criteria which projects must meet to receive an offer to connect or use the electricity transmission system. It is proposed that there is a minimum readiness criterion, and criteria aligned with strategic energy plans;

• Introduction of two types of offers, one which contains only an indicative connection location and connection date, and one which contains an actual firm connection location, connection date, and a queue position.

• The application of this new criteria to the existing connections queue (in addition to future applicants); and

• The introduction of two application windows each year allowing for a batched application process and more coordinated network design.