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13/01/2025

Dear Mr MacMillan,

**Connections End to End Review Consultation, January 2025**

Getlink Projects 2 Limited ('Getlink') welcomes the opportunity to respond to Ofgem's consultation on the end-to-end review of the GB connections process ("the Consultation").

Getlink is a key player in mobility infrastructures, international transport and a leader in eco-responsible transport in Europe. Getlink is committed on a daily basis to facilitating trade, supporting economic activity between the UK and continental Europe and creating value for all its stakeholders, by bringing people, business and culture together.

Getlink has extensive experience in developing interconnector projects and operating interconnector infrastructure. Under the Getlink portfolio is ElecLink, a 1GW HVDC electricity interconnector between Great Britain and France. Commencing full operations in May 2022, ElecLink has helped strengthen the security of energy supply between Great Britain and France and is also the first HVDC electricity interconnector between Europe and the UK that has no impact on underwater ecosystems.

Getlink is currently in the early stages of development of a new 1GW GB-France interconnector through the Channel Tunnel and is the preferred future project of choice on the GB-France border by CRE and RTE<sup>1</sup>. This project is referred to as ElecLink 2 (previously Cobalt).

Throughout the remainder of this response, we have provided direct commentary to the questions provided within the Consultation which we believe we are well placed to answer in our position as an interconnector developer and operator. The following sections address each of Ofgem's proposals and questions as requested by the Consultation.

**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?

**Getlink response:** Getlink agrees with the issues identified by Ofgem in terms of the visibility of connections data and network capacity which often results in connection applications being submitted blind to the likelihood of an offer being made for the requested connection location. This

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<sup>1</sup> [Opportunity for new electricity interconnection capacity between France and the United Kingdom | CRE](#)

results in an inefficient process whereby developers are limited to submitting uninformed connection offers and waiting until a connection offer is received to understand whether their original connection preference was viable or if they need to adapt their project to a new connection location.

**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?

**Getlink response:** Getlink support the implementation of a regulatory requirement for NESO and the DNO's to develop a tool to provide a digital view of connections. Whilst we do not have a strong need for a single platform across NESO and the DNOs to fulfil this requirement, we understand the benefits that this may provide for developers of other technology types. We also encourage Ofgem to consider which option will allow such a digital tool/s to be delivered at pace. As proposed within the consultation drafting, a central delivery body such as the Energy Networks Association could facilitate a more efficient and consistent solution.

**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?

**Getlink response:** Getlink also supports the introduction of a regulatory requirement on the creation of guidance/ standards for such data visualisation tools. Without such guidance the tools will be of limited use to industry. Similarly, without set standards it is feasible that these tools could cease to be updated and maintained, again limiting the use to industry.

**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?

**Getlink response:** To compliment the delivery of visualisation tools, Getlink also supports the proposal to introduce a new regulatory requirement to provide compiled system-level connections data. Whilst digital tools are useful in visualising a specific connection area, compiled system-level data which is easily accessible will enable industry to undertake its own assessments and analysis with ease and in doing so support the quality of connection applications.

**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?

**Getlink response:** Getlink welcomes the work that has already been undertaken by NESO to develop the Connections 360 portal and view such a development as a step forward in the availability of connections data. We also understand that this portal remains in development, we look forward to its full implementation in the coming months.

However, in the meantime, we believe there is a significant absence of transparent and easy to use connection data. The data which is available on the 360 portal and the connection registers is piecemeal and often outdated, with the registers sometimes not being updated for weeks following the finalisation of new connection agreements. Moreover, whilst a record of connection agreements

per substation is useful, information on enabling works and dependencies between projects is fundamental to ensuring quality connection applications. At present this information is not available to industry in any form other than through commercially sensitive individual connection offers.

**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.

**Getlink response:** As outlined within our response to Question 1e, we believe the publication of information regarding required enabling works and dependencies between projects is critical to ensuring quality connection applications. Whilst we do not envisage significant legal barriers to the publication of this detailed information, we believe that aggregation/ anonymisation at a suitably localised level should address any such concerns.

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

**Getlink response:** No response provided.

## **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?

**Getlink response:** Getlink agrees with the issues set out under Theme 2 and recognises a number of these concerns through our own recent experiences within the transmission connection process. Due to the vast number of live connection applications/ offers and the lack of clear performance standards to which the networks are held to account, the level of service provided can vary significantly, with substantial involvement from the developer often required to receive and progress with a competent connection offer. This places an inefficient burden of connection experience and resource within the developer’s organisation in order to support the connection process.

**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?

**Getlink response:** Getlink supports a general principles-based licence condition and supporting guidance on the standards of customer service as a minimum, in the case that minimum standards and/or SLAs are not feasible.

**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?

**Getlink response:** Getlink welcomes the proposed introduction of prescriptive conditions around standards of service. These standards should cover the full connections journey including the pre-application period, the application to offer period, the provision of the offer itself, the offer acceptance period and the connection construction period.

**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?

**Getlink response:** At the transmission level, Getlink is not aware of any service requirements which should be revised or removed in order to improve the quality of connection offers. Instead, Getlink supports the maintenance of the requirement for transmission level connection offers to be made within a 3-month period, regardless of the introduction of wider requirements on the standards of service. In contrast, wider conditions on the standards of service should increase the likelihood that competent connection offers are provided in advance of this timeline with the 3-month deadline only coming into effect during most complex cases.

**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?

**Getlink response:** No response provided.

### **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?

**Getlink response:** Whilst Getlink does not have recent direct experience of the issues identified within the consultation, given the early stage nature of our current connection agreement, we strongly support a balanced approach to the standards applicable to project developers and NESO/the DNOs, on the basis that both the developers and the networks should be held equally accountable and incentivised for delivery against the agreed connection date.

**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?

**Getlink response:** Getlink are of a view that under the current regulations, the existing applicable licence conditions are open to interpretation (i.e., “*must use its best endeavours*” and “*use all*

*reasonable endeavours*") and could lead to inconsistencies in the way licensees adhere to the condition and apply it when progressing different connection applications. As such, Getlink supports the introduction of a strengthened principles-based licence condition on meeting connection dates as a minimum, in the case that minimum standards and/or SLAs are not feasible.

**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?

**Getlink response:** Getlink welcomes the proposed introduction of minimum standards/ SLAs around meeting connection dates. We believe one approach to the implementation of these standards could include the introduction of milestones equivalent to the Queue Management Milestones imposed on project developers, setting out what deliverables must be achieved by the network/s and by when in relation to the agreed connection date.

**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?

**Getlink response:** Getlink strongly supports the introduction of a financial instrument designed to offer recourse to connecting customers which face detriment due to network delays. The introduction of such an instrument will be essential if developers are to effectively balance the risks associated with such connection delays. Additionally, the implementation of a financial instrument will ensure that it always remains in the network's best interest to prevent a delay to the connection date, in all scenarios where such a delay can be avoided.

**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?

**Getlink response:** No response provided.

#### **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?

**Getlink response:** Getlink agrees with the concerns raised regarding the quality of provided connection offers. Specifically, Getlink experienced numerous delays to the connection offer for ElecLink 2 (previously named Project Cobalt) due to relatively simple administrative issues with a competent offer not received for over 4 months following the original 3-month deadline.

At the transmission level we do, however, question whether this lack of quality is driven by the required speed associated with providing a connection offer within 3 months. In our experience, the

inaccuracies and quality issues which exist within connection offers seem to be more closely linked to the increasing volume of applications and what appears to be limited experience within the network connection teams (especially for more unique technology types) and a lack of a robust quality review process prior to the distribution of the connection offers.

**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?

**Getlink response:** Getlink supports a principles-based licence condition on the completeness/ quality of the offer and supporting documentation as a minimum, in the case that minimum standards and/or SLAs are not feasible.

**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?

**Getlink response:** Getlink welcomes the proposed introduction of minimum standards/ SLAs on the completeness/ quality of the offer and supporting documentation. The specific standards which are introduced could include a limit to the number of revisions by the network which are permissible post offer, a limit to the volume of changes which must be requested by the developer in order to achieve a competent offer which are permissible and/or a maximum extension of any connection offer period in order to achieve a competent offer which is permissible, with a failure of the networks to comply with these limitations resulting in a penalty.

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

**Getlink response:** Getlink believes that as an absolute minimum a “high quality offer” should:

- Accurately reflect the technology type and entry/exit capacity requested
- Is thoroughly reviewed by both NESO/the respective DNO and NGET, and as such is not subject to substantial updates to the enabling works
- Provides clear reasoning for any changes to the requested connection date/ point/ capacity
- Clearly sets out the required enabling works, dependencies and interactions with other projects
- Correctly references and is in full alignment with the CUSC
- Is reflective of the applicable connection process at the time of providing the offer
- Contains limited administrative, grammatical or spelling errors

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

**Getlink response:** No response provided.

#### **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?

**Getlink response:** Whilst Getlink supports the proposal to strengthen the requirements on networks to meet connection dates, we also recognise that this could incentivise networks to offer more conservative connection dates as outlined by Ofgem under Theme 5. Additionally, we believe there would be benefits in promoting the ambition of connection offers separate to Theme 3, with a lack of ambition in some recent connection offers seeming to be already present within the connections queue.

**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?

**Getlink response:** Getlink agrees with the proposal to strengthen the principle-based licence condition around offering the earliest achievable connection date. We envisage that such a condition could include reference to the original connection date requested by the project developer and a maximum acceptable delay to this date, subject to the enabling works being satisfactorily demonstrated as unfeasible in time for the requested date. As outlined by Ofgem, Getlink is also in favour of the introduction of a requirement on networks to offer an earlier connection date to a project developer if/when it becomes available and the provision of alternative options which would achieve the requested connection date if the developer was to “opt-in”.

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

**Getlink response:** No response provided.

#### **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.

**Getlink response:** No response provided.

**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?

**Getlink response:** No response provided.

**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?

**Getlink response:** No response provided.

### **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?

**Getlink response:** Although Getlink is aware of improvements which could be made to the determinations processes, we believe that the majority of determinations are the result of unclear NESO and DNOs performance metrics and standards throughout the connection process. Without clear guidance to refer to in these areas, project developers are often forced to proceed through the determination route in order to gain clarity on the level of service that they should expect. Therefore, whilst we believe that improvements to the determination process would bring benefit (especially through a focus on increasing the efficiency of the determination process) we envisage that the improvements outlined in the previous Themes will have a larger impact on reducing the number of cases requiring determination.

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

**Getlink response:** Getlink supports the proposed review into the connection determination process as outlined by Ofgem. We would encourage this review to consider how this determination process is best adapted to reflect the changes proposed within the previous Themes and the wider Connection Reform.

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

**Getlink response:** No response provided.

### **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.



**Getlink response:** On the whole, Getlink supports the proposed “Post Price Control Performance Review” over the two other presented options. Primarily this option is preferred as it is the only proposal that covers the full range of network performance metrics with both the “Connection Timeframes” and “Supergrid Transformer Capacity” proposals being fundamentally too limited in scope to incentivise comprehensive improvements in performance.

We do, however, have concerns that the “Post Price Control Performance Review” approach is proposed to be solely reflective in nature with projects and government decarbonisation targets being potentially at risk due to this delay between action and regulatory assessment. Therefore, if this approach was to be implemented, we would encourage regular regulatory reporting requirements throughout the RIIO-ET3 period to enable performance to be monitored, incentivised and corrective action to be taken, if needed, between review periods.

**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 RIIO- ET3 and drive behaviours that have a positive long-term impact on the network?

**Getlink response:** No response provided.

A handwritten signature in black ink, appearing to read "Alice Varney".

Alice Varney

**Development Manager, ElecLink 2**