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Swindon, 12.02.2025

**RWE RESPONSE TO OFGEM CONNECTIONS END-TO-END REVIEW OF THE REGULATORY FRAMEWORK**

Dear Alasdair MacMillan,

We welcome the opportunity to respond to the consultation: Connections end-to-end review of the regulatory framework, published in November 2024.

Answers to the specific questions in the consultation are set out in Appendix 1 below. These answers are non-confidential.

Yours sincerely,

**Andrew Allan, Claire Hynes & Tim Ellingham**

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## **Appendix 1**

RWE is the leading power generator in the UK, with a diverse operational portfolio of onshore wind, offshore wind, hydro, biomass and gas. We produce enough energy to power the equivalent of around 12 million UK homes, with a combined installed renewable capacity of over 4.8GW (2.79GW pro-rata share) complemented by around 7GW of modern and efficient gas-fired capacity, crucial for UK security of supply.

RWE intends to maintain the pace of investment with an ambition to invest around €8 billion net in the years 2024 to 2030 in developing clean energy projects in the UK to support the energy transition, creating high quality jobs across the length and breadth of the country.

We are investing today, with 2.2GW of new renewable projects currently in construction. This includes our 1.4GW Sofia offshore wind farm, three new onshore wind farms totalling 169MW, 11 new solar farms totalling 530MW and four co-located battery storage sites totalling 105MW.

We have ambitious plans to expand our UK footprint even further, with over 17GW of renewables at various stages of development. This includes nine new offshore wind farms totalling nearly 10 GW, c.1.8 GW of onshore wind and 3.9 GW of solar. Complementing our renewables pipeline, we have over 3.6 GW of battery storage under development, and we are in the early stages of developing four gas carbon capture and storage (CCS) projects across the UK, totalling up to 4.6GW.

In addition, as a key component in the energy transition, RWE is developing ~500 MWe green hydrogen opportunities across the UK.

We directly employ over 3,100 people across the UK and our planned investment will continue to create green jobs, developing green skills up and down the country.

We are committed to working in partnership with the government to deliver its 2030 clean power mission, and to deliver clean, secure and affordable energy for the UK.



## **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 would agree with the issues identified in respect to network capacity.

However, Theme 1 title is also “connections data” and the problem statement should not just be about network capacity, it should also be about connecting assets – both generation and demand. However, issues identified focus on network capacity, grid / grid assets.

It is important not just to know where there is capacity to connect, but also the details of the other local assets, to avoid oversupply in one region and undersupply in another, and assist in market delivery of economic build out. Consideration needs to be provided as to the level of hardware redundancy required at a connection point, for example, a connection site may state it has three times 200MW transformers and a maximum demand capacity of 300MW. This may imply a headroom of 300MW where in reality there is only say 100MW as one transformer is required for redundancy reasons. Supplied information need qualifying to avoid unintentional conclusions.

In principle we welcome the development of a geospatial tool to represent the connections in the TEC register (Connections 360). However, in reality we are disappointed in the level of functionality of the product. We trust that it will be developed further. There are several points that could be improved upon before the new transmission connection process pre-application phase in Q2 2024.

For example: Test Onshore Windfarm (Inveroykel)

- The site’s connection point is available in the table but not in the map.
- It is not clear that Inveroykel is connecting to Loch Buidhe substation or even that Loch Buidhe substation exists and could be an available connection point.
- At pre-application, if wanting to connect a site in the north of Wales, it doesn’t appear to show that a new substation is planned to be built in the area and any of the sites contracted that we already know are connecting there.



We suggest that all of the planned substations that projects have connections to are represented on the map if possible. Appreciate that it will take some time to get this geospatial tool into its preferred state.

We are keen to see the full TEC queue published on Connection 360 when the queue is reordered in line with the date the Gate 2 Criteria is submitted in the Gate 2 submission window by the end of 2025. We consider that this level of transparency would go a long way to giving comfort to developers, given the range of new powers that NESO is expected to receive under connection reform.

We would highlight a concern that Data transparency may be limited by the overlap of the proposed bi-annual TMO4+ transmission connection process where the pre-application process starting at Month 7 is running at the same time as the Gate 2 design process for projects who applied in Month 1. For the pre-application data to be effective, it requires a much more nuanced approach by the network operators. The Connect 360 tool should ideally list all applications to connect at a substation and update in real time once a smart contract has been counter signed via electronic signature software such as docu sign so that applicants know that the capacity is unavailable. Each contract will hold milestones and therefore, it should be transparent how progressed a project is to connecting at the substation.

Building on automated online application forms, Smart contracts would be electronic, with built in scripts which can provide automated updates to databases confirming that they are now signed, and key details contained within – which could be used to auto populate associated network maps/details. Smart contracts would reduce the requirement for manual entry and therefore reduce the chance for user error and provide a near real-time reflection of the connection queue.

**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 agree with the proposal in principle

Whilst we note that NESO as ISOP is strategically best placed to deliver a single digital view across the whole network system, we note that the Energy Network Association (ENA) historically has a better record and expertise in delivering these types of projects through



their Open Networks Programme. The ENA has a broad range of IT contacts through the development of a single digital platform for DNOs. We would therefore suggest a collaborative project between the ENA and ISOP, with the ENA leading the project.

Once the CUSC and DCUSA industry codes are held under one code, we would hope to see this more centralised approach extend to a single source for connection applications at both DNO and TO level. In terms of the ongoing management, we note that should the ENA as a network trade association have the contract for code managing the D Code removed under code reform, that it may be considered inappropriate for the ENA to be holding the networks to account to maintain and develop accurate tools that generators can rely on as these two roles may be seen as incompatible. This is in the scenario that the ENA do not hold another role in the industry that gives them the vires to provide oversight and to have sufficiently ringfenced powers to hold network operators accountable.

**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 agree that it's "very important that the types, format and granularity of data available to users within the different tools is standardised across DNO regions and across transmission and distribution boundaries to ensure maximum usability". We agree with direction of travel towards a single holistic tool, acknowledging the potential challenges in achieving this across all of T&D

We are comfortable to leave identifying the specific location of these requirements to be advised by network operators and owners, who are closest to these licenses and guidance documents.

**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 with a proposed new regulatory requirement to provide "compiled system-level connections data on a regular basis for external publication".

For DNOs, there would seem to be some logic in aligning the proposed requirements with Part C of Standard Condition 46 of the Electricity Distribution Licence. However, whether or



not it is also the best place to define requirements for transparency data related to connections may be best answered by Distribution Licensees closest to these requirements.

**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?**

The existing sources are neither clear or transparent, and they are also not reliable or of sufficient quality. The Transmission connections data is quite incomplete. Distribution Embedded Capacity Registers provide some additional useful information.

Connections registers should comprehensively identify for both generation and (large) demand connections their:

- Project connection ID/code
- Project name
- Company
- Queue position (with the context of full transparency of the connection queue, and any inter project relationships)
- Connection GSP/NETS substation
- Coordinates of GSP/NETS substation
- CP30/other central planning Zone of GSP/NETS substation
- Coordinates of project
- Connection status (planning status, built etc.)
- Connection date / MWs effective from
- Clear identification of MWs of each technology behind a multi-technology/hybrid/co-located connection/ site
- Projects at Gate 1 with indicative substation connection points
- Projects that have applied but not yet accepted their connection offer
- Projects that have accepted their connection offer for a substation for the purposes of providing transparency at the pre-application stage

At transmission level, we believe the NESO should also share:

- Information whether the connection is firm and non-firm.

- Sharing the power system model. All the EU operators sharing the power system model through ENTSOE. Other TOs such as Spain sharing their power system model monthly. ETYS includes the network connection elements (lines, transformers, single line diagram, capacitors/reactors), while the TEC register shows the connection the point for connected and accepted plants. In transmission the network controllers influence the flows ( reactive power compensation voltage control, transformer taps, quadratic boosters) which are not confidential information as they are owned by NGET. Given that the majority of the power system model is already shared, we believe that the model should be shared for transparency.
- Clarity on how non-firm connections are managed (pre/post fault).
- Sharing the Cost Benefit Analysis (CBA even redacted, anonymised) during the connection procedure and investment decisions.

Additionally, there should be detail in respect of:

- Physical characteristics of the current substations and/or the proposed substations/extensions (including redline boundary, general arrangement overview, SLD, switchgear type [AIS, GIS] etc.)
- number of bays (detailing contracted and available)
- number of transformers,
- rating of transformers
- redundancy requirement (GSP)
- tertiary windings
- demand MWs (total installed, and available headroom)
- accessible generation MWs (total installed, and available headroom)
- GSP demand class

**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.**

We consider that all reasonably required connections data when accessed via a password protected connections portal or connect 360 by invested parties who sign up to the platform's relevant terms and conditions, should be able to be published. This model has



already been rolled out in other markets such as by the U.S. Midcontinent Independent System Operator's (MISO) which applies a universal NDA to clustered projects so that they can access load flow models and detailed studies stored on MISO's Extranet. This approach may mitigate concerns for NESO around data protection later in the process when projects want access to the detail of projects involved in the same enabling works.

We do acknowledge there are several other parties who do not have direct development interests such as consultancies, research/educational institutions and others who should reasonably have access to data, but perhaps limited, and similarly required to contract under an end user agreement for access.

Regarding non-firm connection, we propose the below information be shared as without it, a project cannot confidently make a business decision.

- Normal and short-term ratings (3,5,10,60min, 6hour ratings) and under which circumstances they are used.
- The full connection queue, position within it, and relational context
- Network power system model (the Power system model is shared by ENSOE for European Countries).
- Clear identification of the assets which can be overloaded and under which conditions.
- In which situation the network security is managed pre-fault or post-fault (inter-trips or turn down scheme). Security of supply standards is vague referring to unacceptable loadings.
- How often the available capacity will be allocated to the generator (single export for the whole day/week, different output every half hour through the balancing mechanism platform)

NESO selectively shares data. Engagement with the industry is recommended on which data is considered as confidential/non-confidential. It is worth considering that there is already available data which may not be directly linked with data considered confidential but with basic processing, the data could be derived. For data considered as confidential, industry engagement can identify if the data can be shared in a different format by aggregating or anonymising it. For example, the assumptions made on an offshore plant connecting in





HND/Beyond 2030. Whilst HND does not mention specific projects, the quoted capacities could easily identify the projects.

Currently there is no consistency on which data is confidential and which is not, resulting in instances where the same data is treated differently in respect of network publication, network operators or even the individual you are dealing with.

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

At this point in time, prepared to the best of our ability, we believe our positions on this theme are represented in responses above.

**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?**

We fully agree that there are limited or no “standard of service” requirements in certain phases of the customer journey and that this is a problem. We would highlight that this has resulted in perverse incentives – for example prioritising resourcing getting offers out (due to a timebound requirement to do so) over delivery of contracted connections (where there is no incentive to deliver this). And, most impactfully, connections which are delayed years, at a late stage in the project – meaning the Generator has already invested and is shouldering substantial economic losses due to the connection companies.

**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?**

From the information available, we believe a principles based approach would not provide a sufficient incentive.



**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 agree a minimum standards licence condition would be most appropriate. With a condition, there must also be appropriate incentives/penalties to ensure these requirements are met.

We have a preference for a more prescriptive condition so that it is clearly defined:

The requirements should be defined for and apply to the holistic customer journey from making available pre application data, through contracting (timeline, quality), to connected asset (programme, price, quality).

As well defining service standards related to each stage of process, there must also be standards of service defined for responses to questions and interaction, where there are changes, clarifications or deviations that arise.

For example, there should be a standard of service for providing a quote for example for a three phase connection up to 69kVA, it should be delivered within 30 Working Days from acceptance. There is legislation for the small demand connections on how they are treated and the timeframes under which they are responded to which could be introduced for large scale connections.

**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?**

We expect that any change to requirements should not in any case reduce existing obligations upon connection providers, rather only enhance them where there is currently a deficiency of defined requirements.

It is important to avoid duplication of requirements, but also to have clarity on requirements throughout the customer journey, with consistent weight behind the obligations.



Consideration for standardisation of the connections journey post the standardised ENA application form would be desirable.

**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?**

It is important to highlight the resourcing implications of the proposals throughout this consultation. It appears there is a lack of experienced and capable resource employed across network companies. Even where roles are filled, there is a distinct lack of efficiency – for example non-engineers managing engineering topics, or excessive workload placed on individuals. A degree of underpinning electrical appreciation/understanding cannot be avoided when working on connections topics.

Essential therefore is raising the standards of employment within network operator and owner companies, to enable improvement.

If greater burdens are placed on these teams, without upskilling and appropriately resourcing, it's hard to understand how any of the proposed reform would be realised in practice.

Better employment of tech and data tools, such as AI, in reviewing and validating content before issue might also be valuable in streamlining the process.

**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 agree with the issues set out under Theme 3.

It is noteworthy, that in any other contractual relationship with a private company, the contractor (in this case network companies) would themselves be liable for costs incurred beyond the quoted amount, or be subject to Liquidated Damages in the event of delays beyond contracted completion date.



It is therefore also worth emphasising that from the customers perspective, we would expect to receive an offer with firm scope, programme, costs and exclusions. Not one which includes only poor estimates, where the customer foots an uncapped bill for any increases in costs, or suffers revenue losses where there are delays in providing the connection.

Additionally, we have observed that a key stage in the process with respect to securing land rights for wayleaves is often started too late, with knock on impacts in the connections programme.

We also believe there may be merit in reviewing procurement requirements which appear to stipulate gold standard requirements, and therefore may limit competition and the breadth of suppliers that could reasonably help accelerate the process.

**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 approach would provide sufficient incentives for delivery (to time, cost and quality) or structure to be able to enforce requirements or penalise non-compliance.

Implicitly principles based is already in the licenses condition (“best endeavours”/ “all reasonable endeavours” 2.71-74) and this is clearly not delivering desirable outcomes.

**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?**

We believe a minimum standards approach would be necessary.

It is noteworthy that minimum standards in a license condition without defined recourse also does not deliver desirable outcomes (DNOs currently are required to operate as presented in 2.75-77)

It is important to also determine a solution which remains anchored in the principle of cost reflectivity, and with some incentive to accurately advise of these costs at the offer stage,



such that the connecting customer is able to accurately assess the financial and programme impacts on their project before making decisions to accept, or subsequently proceed to Final Investment Decision.

The network companies should then hold some liability for deviation from contracted scope, programme or pricing.

For example, similar to demand connections, where the network operator is quoting for a high voltage connection, if it delivers the connection over 35 days (illustrative) late then the network operator should face penalties.

**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 prioritise a mechanism which ensured delivery on time, over delivering financial recourse. Each project will have a different financial profile and there may be difficulty in establishing a fair and balanced financial instrument. However, we agree with the proposed principle of an incentive to drive better forecasting (of scope, price and programme in particular).

**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?**

At this point in time, prepared to the best of our ability, we believe our positions on this theme are represented in responses above.



## **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 agree with all the issues highlighted in Theme 4. In addition, we draw attention to and emphasise the poor quality estimation that we have observed, and which puts all liability and risk from the network operator and owner's poor quality offer, onto the customer (predominantly price and programme risk).

We believe this trend is related to volume of offers and complexity of network development, as well as resource level and competence employed. We understand the balance between time and quality, but rather than a possible outcome being increasing the duration for the offer, we would expect that a high quality offer should be deliverable in current timeframes, with increased capability and capacity (resourcing effectively – both the size of the team, and the competence employed)

For transmission offers in particular, we also note there is often poor quality drafting, and the difficulty in following amendments to existing offers. When there is an Agreement to Vary, often several parts are not restated with the offer, and there is no redline provided of the changes made.

We have observed changes being made in sections that shouldn't have been edited (literally comparing contractual text side by side and word for word, in the absence of a red line copy from the contracting counterparty)

There have been scenarios where the network operator did not hit clockstart on the agreement in error. This can have significant ramifications on development programmes. For example, without escalation and intervention at the most senior levels, this could have resulted in projects consequently being unable to participate in the Capacity Market auctions or other market opportunities. It also impacts the actual queue position secured, and could therefore have serious implications on project viability depending on other applications progressed in the intervening period. There should be a standard checklist that should be carried out as a bare minimum.

Common questions on an offer could be covered by an AI chatbot. The e-mail system needs to be embedded in the connections portal so that the account manager can be notified and the customer can be notified when they receive a reply. It would also be beneficial to have a dashboard for all projects which shows where responses are received or remain unanswered.

AI could be used to check if there is an anomaly in the connection form and notify the User to confirm submission.

**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?**

We believe a principles based solution would not be sufficient to deliver the desired and required outcomes. There needs to be some incentive.

**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?**

We believe minimum standards are at this point the only way that improvement will be delivered. Years have demonstrated that the motivation from the existing system is insufficient.

For example, there should be standards for:

- ‘*Cost Firmness*’ - the cost should stay within a defined range of the original quote unless, there is something arising that was reasonably excluded from the initial quote. Access should be provided to the most recent pricing and procurement information for transparency.
  - There are many instances where a project enters into contract on the basis of a quotation, where final costs at completion are significantly in excesses of the initial quotation – and for which the project has full liability. There is no penalty to the network operator or damages payable to the customer associated with these significantly impactful additional costs.

- In the scenario where a quote of 5 million is provided and the initial quote is accepted, and at a later date a further additional 5 million quote or bill (total £10m) is issued, there should be repercussions for the level of inaccuracy. For example, wording could state that the network operator '*Produced a non-compliant offer, at the point of replacement with correct document then pay the relevant penalties*'. This is to ensure that the customer can rely on the quote received within a certain parameter.
- 'Cost Fairness' – an obligation for DNOs to publish accurate benchmark information on asset and works costs.
  - For example, per unit price per kilometer of cable, some metric for excavation works, £/MVA for transformers. If these are not defined, it's not possible to hold to account where inefficient procurement results in above market value costs. This already conditioned behaviour where the network operator is cost neutral to any inaccuracies or quality of service provided is unlikely to change unless a more prescriptive licence condition is introduced.
  - There should also be some incentive to ensure that the network operator is providing value for money. An incentive to undertake competitive procurement. And in the end drive value for the end consumer. Currently we believe these pass through asset costs are often above what a user would be able to procure from the market (for example for a GIS bay).

Given that there are monopolies operating by network area and voltage level, there should additionally be full transparency and published performance metrics across all network operators. These could include on a monthly or quarterly basis

- Average time between application and offers issued
- Average time between offer date and the offered connection date (at DNO level this would show up where some network operators are clearly providing conservative offers that they have high confidence they can deliver)
- Average cost to connect

All of the above tagged by region, voltage level and technology such that customers could reasonably draw conclusions on comparable performance – who is charging too much, and who is taking too long to deliver it.





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

As described in Theme 3, we would consider a high quality offer to be one which is firm on

1. Programme,
2. Scope,
3. Cost and
4. Exclusions.

With deviations from that contracted position (as with any other contract for products/services with a private organisation) being at the contractor’s (connection provider’s) cost/or some associated incentive.

We welcome the proposals also on providing alternative connection options, and ensuring there is clarity on connection dependencies (particularly TO dependencies at DNO level offer).

In addition, for an Agreement to Vary with NESO for example as a result of a Modification Application or Admin Change Mod App, we would expect to see

1. Complete restated offer with every Mod App/ Agreement to Vary, rather than only updated sections. This is for two reasons:
  - a. For connection agreements where there have been multiple updates, it is often hard to identify the relevant version for reference, where certain appendices which are not updated, are not reshared.
  - b. There have been occasions where changes have been made to parts not shared, and therefore the customer is unaware of these changes.
2. Full red line of ALL changes to the contract.
  - a. Regularly NESO include amendments within sections of Appendices that they do not tell the customer about, and these are often hard to find.

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

It is worth considering the contractual relationships that exist in the current model. Why does a user have to contract with NESO? A significant proportion of issues arise from having to



contract via the ISOP, in this case NESO, in the middle. We observe resource capability and capacity at NESO often results in delays and inefficiencies. Like on DN, could it actually be most efficient if users were to contract directly with the respective Transmission Owner (akin to the distribution world)?

We would welcome the introduction of an internal benchmarking system across network operators for producing a good quality connection offer in a timely fashion that Ofgem could hold the network operators to. A picture of the performance of network operators could then be built over time.

It's worth acknowledging observed differences and that the future system could reward positive aspects to incentivise improvement, as well penalties. For example, in NGED DNO offers, we see a good cost break down, and technical details. Whereas from NGET we don't get very much at all by comparison. Sometimes the information is more readily available from the DNO than the TO, demonstrating inconsistency.

## **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 that adding obligations on delivery could result in lack of ambition (late dates) in offers generated. We acknowledge the tension between imposing incentives to deliver as per contract, and the detail/content of the associated offer – especially when working with monopoly providers. We agree there needs to be a balance found between implementing incentives, while not delaying Clean Power 2030 and subsequent strategic energy plan delivery

We believe at DNO level, transparency around performance could be a useful method/tool to hold companies to account on performance.

This is perhaps most challenging at TO level with fewer providers for competitive comparison, and more complex infrastructure projects required.



It is important to also recognise good aspects and outputs. A scoring system should also highlight and potentially reward good performance, as well as creating the framework to drive improvement in other areas.

**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 agree that there should be a strengthened principles-based licence condition around offering earliest achievable (and not likely to slip incrementally!) connection dates, and also to accelerate existing connections where opportunities arise to do so.

We also would like to see some requirement for engagement from the network operator/owner in refining a proposal (connection application) to meet what is achievable with the system requirements. Eg. if a project reduced in MW by 10% - would it be possible to connect earlier?

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

At this point in time, prepared to the best of our ability, we believe our positions on this theme are represented in responses above.

## **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.**

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**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?**

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**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?**

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## **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?**

It would appear that several of the issues raised may have come from networks stakeholders, so do not necessarily recognise these from our own experience.

We do however agree that “the determinations process can be lengthy, protracted and inefficient”. We also note the significant expense and resource commitment associated. And this being true to the extent that we have not regularly engaged with this route, even where it could/should have been a useful next step.

Connecting customers can be left feeling helpless, where network operators and owners are not meeting expectations or requirements, and the routes to escalate feel pointless to engage with – given the complete imbalance that exists in the contracting relationship (limited rights, and all liabilities, with the connecting customer).

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

We agree with the proposal to review the guidance for connection determinations

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

At this point in time, prepared to the best of our ability, we believe our positions on this theme are represented in responses above.