OFGEM [Connections end-to-end review – consultation](https://www.ofgem.gov.uk/sites/default/files/2024-11/Connections_End_to_End_Review_consultation.pdf)

Deadline 13th January 2025

SECTION 1

Issues

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?

It would be helpful if enough of an onus is put on providing up to date, correct information that a customer could ask for a refund on A&D fees had the information been included on the portal.

Proposals

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?

Yes this would be very helpful as the variance in the information between DNO’s is not helpful. It would be helpful if there were more ‘links’ between the information e.g a cable on the map should contain the details provided in the LTDS (CSA, rating, length, etc). Also standardised drawings would be helpful as there are variances between schematic diagrams between DNO’s.

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?

Having a single source would likely require an amalgamation of the various methods the DNO’s use to record data, it would be helpful if all changes are clarified along with links to more detailed drawings that are unique to that DNO.

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

It would be helpful if the DNO confirmed which software they use (e.g. Power Factory) and made the appropriate files available. This would allow a connections customer to carry out their own modelling and if necessary, provide this to the DNO to help speed up the connections process.

Other

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?

Having transparency from the DNO around their connections methodology would help customers make more accurate assessments e.g there is typically enough information about an existing substation with transformer sizes, cable specs, etc to determine any spare capacity but without the granularity of half hourly data, in flight connection offers, contracted demand (this could be provided with any commercially sensitive information withheld) it is very difficult to determine the accuracy of a self assessment.

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 made available, for example by aggregating it to appropriate levels/anonymising it etc.

As above, half hourly data and contracted demand would be beneficial.

Anything else

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

It would be helpful if heat maps could be reintroduced following the gated process to give a high level view of areas that may be viable for potential connections. Also, it would be helpful if online tools could provide some high level information about the network e.g fault level issues or issues that may impact a potential connection at a higher voltage.

SECTION 2

Issues

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?

The pre application stage is something that needs addressing as the standards of service and information provided varies massively between DNO’s. Also, it would be helpful if DNO’s could provide clarification around their assumptions, moving forwards it would be helpful if potential connections are discussed based on connections that are progressing with planning and the available capacity in the technology pot.

Proposals

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?

Set out a minimum standard of information that should be provided to customers, some of this may be a ‘data set’ that the customer has to interpret but this information should be consistent between DNO’s.

2c) Do you have any views on proposal 2b (new perspective 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?

The pre application stage for the reasons shown above. Also, as per the notes in the document, the Project Progression stage needs to be managed consistently, especially if the gated process leads to DNO’s having two windows per year to submit the necessary gate 2 information to NESO. With the technology pots having a finite resource for the region, errors from the DNO can have drastic consequences which will not be acceptable moving forwards given the huge up front costs required with the heightened barriers to entry.

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?

The pre application stage could be removed if the open data source discussed in part 1 provides enough information and this ensures that the DNO’s have enough resource to better manage the formal connection applications and submissions for the TIA.

Anything else

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?

The potential for extending existing switchboards shouldbe established at an earlier stage. It is possible to be in the scenario that a DNO will provide a connection offer that includes extending a switchboard without knowing if this is possible until detailed design starts. Considering that generation projects can be years down the line before this starts, this is information that should be held by DNO’s.

SECTION 3

Issues

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?

The issue with delays needs to be addressed. If the DNO or TO delays the connection date this there is no consequence where as a developer has defined milestones as per the ENA queue management guidelines which are managed very aggressively.

Proposals

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

There needs to be a definition of what is the DNO/TO’s control and a suitable tolerance for slippage should be considered.

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 needs to be transparency with the various activities that the DNO/TO are responsible for and requirements to complete them within a set period such as a defined number of weeks before the proposed connection date. For example, the DNO/TO should be able to demonstrate that sufficient notice was given to outage planning to secure an outage for the connection. If there extenuating circumstances that have prevented the planned work e.g volume of faults or a weather event then this should be considered. Simiarly, basic project management such as ordering plant and materials should be carried out within 3 days of a customer making payment.

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?

This is a reasonable and fair step. The financial penalty should be based on the level of impact to the customer which will largely depend on the stage of the project that the delay is notified. This could work similarly to securities with the penalty increasing the closer to the connection date the delay is notified to the customer. Also, as per above there should also be compensation if it is determined that the delay was as a result of incompetence rather than circumstances outside of the DNO/TO’s control.

Anything else

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

As the example of a planning submission being out of the control of the DNO was used an example, further leeway should be given to developers as the current ENA milestones do not allow a significant amount of time for planning. If a developer can prove that planning has been submitted, further updates to the DNO should be sufficient to demonstrate that everything is being done to progress the project.

SECTION 4

Issues

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?

For the most part, we have found connection offers to be to a reasonable standard, the problems arise with follow up questions sometimes taking months to get answered.

We’ve had multiple occasions of SSE issuing a revised offer for relatively trivial things without notice such as the cable spec in the reinforcements being revised and the revised offer having no cross reference to the previous connection offer or changes to the document e.g still had mention of the impact of the TIA even though this had been completed.

Proposals

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?

There should be guidance around changes and revisions to ensure consistency between DNO’s. For instance some DNO’s provide a technical analysis of the connection, specifications, network SLD, etc while other DNO’s don’t issue a PoC drawing or SLD unless requested.

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?

There should be an agreed minimum amount of data such as technical data, SLD and PoC drawing.

4d) What do you consider would constitute a ‘high quality offer’?

NPG’s connection offer are the best quality of the DNO’s.

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

No.

SECTION 5

Issues

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?

This is a reasonable default position, however there should also be scope for developers to make requests for connection dates other than the earliest available given the multiple variables associated with a generation project e.g details of the grid connection are required at an early stage to determine the project viability.

Proposals

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

If the earliest connection date is provided, it is vital that this clarifies if this includes any assumptions around the TIA. The connection date on DNO connection offers at present is largely irrelevant given that the outcome of the TIA is the determining factor.

Anything else

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

Would it be possible to provide a range of connections dates based on the state of the transmission network and the accepted to connect queue. This way the developer can provide details of a realistic connection date and if acceleration would be possible if the queue position were to change.

SECTION 6

Issues

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.

The proposal to increase the PP threshold to 5MW would be a welcome change and help unlock a huge number of renewable assets.

Proposals

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

The modelling of the behnd the meter generation should be considered as the worst case scenarios are often used e.g peak generation vs lowest demand. It would not be unreasonable to add further real time control measures such as ensuring that generation is turned down to meet demand in times of low or no load.

Also, there could be a range of flexibility options e.g incentivise the customer to import from the grid at times of high generation on the embedded or transmission connected generation so that the removal of demand on a network with significant generation does not detrimentally affect the DNO/TO network.

Anything else

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?

Full transparency on the PP threshold criteria for a customer to ensure that the application provides all the necessary information e.g is the threshold figure based on export or installed capacity so that applications aren’t delayed while this is clarified. It should also be easier to clarify around other determining factors such as could a fault level limitation device be installed on the customer network to allow for a higher installed capacity that won’t delay the application.

SECTION 7

Issues

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 have had several instances of DNO’s not actioning a complaint or taking months to respond. This makes it very difficult to meet the criteria of going through the DNO’s internal dispute resolution process first. I have also written to Ofgem several times and never received a response.

Also, the DNO’s use the ENA’s ‘Best Practise Guidelines’ either as they are written or making interpretations that are clearly well outside the intended use. Either the ENA needs to increase the number of scenarios or there should be a way of getting clarification around points that do not fit any of the scenarios in the guidelines.

Proposals

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

As above, I have never received a response from Ofgem to written correspondence. This would be the first step in improving the process.

Anything else

7c) Is there anything else regarding Theme 7 - Provisions and guidance for determinations?

Dispute resolution should be made public to be used as precedent in future, similar disputes.

SECTION 8

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.

Given that the increased requirements being put on developers as a part of Connections Reform and CP2030, it is important that DNO’s and TO’s also have additional performance metrics to ensure that they are also held accountable for their part in projects not progressing. Hopefully the increased requirements at the pre application stage will help resolve a lot of issues at source before they become a major problem.

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?

TO’s could be incentivised to find innovative solutions e.g renewable generation is intermittent and only operates at 100% export for portions of the year. Despite this, lots of the system models use the maximum export value when evaluating the impact on the network. TO’s should be rewarded for finding ways to allow the generation to connect that don’t require huge amounts of reinforcement to mitigate a scenario that is very infrequent e.g further refinement of the TANM or contractors with large demand customer who can turn up during times of high generation.