



ChargeUK's response to the Ofgem end-to-end review

About ChargeUK

ChargeUK is the voice of the UK's electric vehicle (EV) charging industry. Our 40+ members are the companies that install and operate the UK's charging infrastructure. Together they play a central role in delivering the Government's mission to make Britain a clean energy superpower.

The UK's charging network is growing rapidly - in 2023-24 alone, our members grew the public network by 47%, installing a new charger every 26 minutes¹. However, this growth needs to continue accelerating as more drivers transition to EVs. Grid connections remain one of the most significant barriers to faster deployment. Our members regularly experience delays of several years for connections, face significant variations in requirements between regions, and must navigate processes that slow down deployment rather than support it.

We welcome Ofgem's end-to-end review of the connections framework. Our response draws on evidence from across our membership about their experience of the connections process - from on-street residential charging to ultra-rapid charging hubs. We highlight where current processes create unnecessary delays and complexity, share examples of good practice where we see it, and suggest practical improvements that could accelerate deployment while recognising the constraints faced by network companies.

We look forward to working with Ofgem and other stakeholders to create a connections framework that enables the rapid deployment of charging infrastructure needed for net zero.

¹ Powering Ahead to 2030, ChargeUK, July 2024. URL: <https://www.chargeuk.org/post/ev-charging-network-can-deliver-half-a-billion-miles-of-motoring-every-day>

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 strongly agree with the issues identified and our evidence demonstrates additional challenges. Network data that is provided is often outdated or inaccurate, leading to connection offers that prove undeliverable when detailed design work begins. Our members report particular issues with as-laid records and information about reinforcement works, which affect connection timelines and add significant cost to projects.

Data provision varies significantly between network areas. Some DNOs provide clear information about non-firm capacity availability at substations, helping customers identify potential connection opportunities. However, this good practice is not consistent across all regions. In one region, for example, reinforcement works increased from 30 in Q1 2024 to 110 in Q4, yet this information was not made readily available to help customers understand potential impacts on their projects. Greater transparency at even this basic level would be beneficial to customers.

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 data available is often incomplete or insufficient in three key areas:

- 1. Connections data for on-street chargers:** DNOs' current data provision lacks clear information about connection points to lamp columns and the presence of "5th core" cable networks across their regions. The existence of looped supplies to lamp columns is also frequently missing from supplied information. These data gaps mean physical surveys are often the only way to verify connection possibilities, leading to increased costs, extended project timelines and sometimes site abandonment when installations prove non-viable after investigation.
- 2. Third party land rights:** Current data portals and connection information lack clarity on required wayleaves and easements for proposed connections. When receiving a point of connection offer, it is unclear how many third-party agreements might be needed, which landowners might need to grant rights, or what the potential costs of securing these rights might be. This information only becomes apparent later in the process, by which point significant time and resource may have been invested in sites that ultimately prove impossible or uneconomic due to third party requirements. Having this information available at the point of connection identification would allow charge point operators to better assess site viability from the outset.
- 3. Visibility of competing applications:** The current system lacks transparency around multiple applications made for the same tender or area by different charge point operators. This creates artificial demand for power that can inflate connection costs and trigger unnecessary upgrade requirements. DNOs need a mechanism to identify and manage these overlapping applications – for example, by requiring tender IDs to group related applications or developing area-specific pricing that would apply equally to all applicants for a particular location, with the successful bidder ultimately paying for the connection. This would help prevent market distortion and ensure more accurate assessment of true power requirements in any given area.

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.

Current data provision falls short in several key areas:

1. First, information about reinforcement works that could affect connection timelines is often unclear or unavailable.
2. Second, data about network capacity frequently proves inaccurate when tested through the connection process.
3. Third, the relationship between transmission and distribution constraints is poorly explained.

We support proposals for improved data visibility but would emphasise that accuracy and timeliness are as important as availability. Data must be regularly updated and validated to be useful for connection customers. The regulatory framework should require DNOs to maintain accurate records and make them available in a consistent format across all regions.

As raised in response to Question 1e, when a point of connection offer is provided it would be helpful to understand whether the DNO has existing legal rights to lay new cables with the landowner where the POC is situated. While we understand that there may be some legal barriers that make this challenging to share, transparency in this instance would help developers better understand whether a site is proceedable or not. As such we would be keen to see solutions that enable it to be made available.

Theme 2: Improved standards of service across the customer journey

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 broadly agree with the issues identified and consider them an accurate reflection of the challenges faced by EV charging infrastructure providers. Our members suggest that on average, between 30% and 60% of applications experience delays due to problems with the connection process, with this figure being even higher for certain types of connections such as unmetered supplies for on-street charging.

Based on our members' experience, there are several additional significant issues that warrant attention:

- **Unmetered connections for on-street charging** face particular challenges. Our members report that almost every application experiences some form of delay, primarily due to DNOs' unfamiliarity with these types of connections. This is particularly acute for lamp column charging, where there can be misalignment between published DNO standards and advice given during the application process. In some cases, DNOs have suggested inappropriate connection routes that contradict their own published standards.
- **Communication and account management** is inconsistent and often inadequate. While some DNOs provide dedicated account managers and regular project updates, this good practice is not standard across all regions. Our members have found that where DNOs hold regular progress meetings including all stakeholders (CPOs, landowners and other relevant parties), projects progress more efficiently towards energisation.
- **Digitisation** should play a central role in the future of the connections process, as we have seen with the ENA's Connect Direct portal for domestic EV charging applications. Extending or replicating this system for public charging - in particular for on-street charging which has similar connection requirements to domestic applications - would be a significant contribution to the ease of deployment of charging infrastructure.
- **Technical requirements** can be inflexible and poorly aligned with commercial realities. Often these are designed and implemented unilaterally by individual DNOs, which makes it challenging for operators to roll out infrastructure across the country.
- **Application requirements** vary significantly between DNOs, creating unnecessary complexity and increasing the likelihood of delays. For instance, some DNOs require detailed site layouts at application while others do not. This lack of standardisation makes it difficult for charging providers to develop efficient processes, particularly when working across multiple network areas.
- **Escalation routes** remain unclear and insufficient. In our members' experience, some DNOs are better than others when dealing with matters that require escalation: the best performers have clear escalation contacts and email addresses that can support developers when things go wrong. Unfortunately, this is not the case for most networks and this can lead to lengthy delays and developers waiting weeks for specific individuals to respond.

While individual elements of good practice exist across different network areas, the overall standards of service remain inconsistent and often inadequate for the rapid deployment of charging infrastructure needed to support net zero. Without regulatory intervention to drive



improvement, charge point operators will continue to face unnecessary delays and costs that ultimately slow the rollout of charging infrastructure.

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?

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?

Whilst we welcome the introduction of principles-based licence conditions to set general expectations on service quality, we strongly believe that specific prescriptive requirements must be the primary mechanism for improving connection services. Without clear, measurable standards, connection customers will continue to face significant variations in service quality and timeline certainty across different network areas.

In our view, solely relying on principles-based conditions risks leaving charge point operators in a similar position to today, with networks deprioritising service quality in order to meet the more specific regulatory requirements in other areas.

We recommend prescriptive requirements focus on four key areas of the connection journey:

1. The grid application and offer process requires specific timeframes for review, feedback and offer provision. This should include standard documentation requirements across all DNOs and clear timelines for responding to alternative connection proposals.
2. Project communication needs specific standards around frequency and quality of updates, including mandatory project initiation meetings and maximum response times for technical queries. DNOs should not be able to delay projects by not responding to queries.
3. Design review and approval processes need clear timelines and standards, including specific timeframes for review completion and requirements for detailed feedback when designs are rejected.
4. Legal and documentation processes require standardised approaches and clear timelines, particularly for reviewing and processing wayleaves and land rights.

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?

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 strongly agree with the issues identified.

Our members' experience is that delays to agreed connection dates are common and cause significant commercial damage. For example, several of our members are still awaiting connections for schemes where connection was awarded in 2021 or 2022, due to delays in grid reinforcement. This is despite paying tens or hundreds of thousands of pounds at the start of the process. Our members also report instances where – after years of delays – they are told that their Point of Connection offer has been cancelled or reinforcement work has not even been started.

Delays in projects are frustrating and damaging in themselves, as they slow operators' ability to begin generating revenue with new sites. However, they also have knock-on commercial impacts, including the invalidation of lease agreements with landlords which can lead to complex and costly renegotiations.

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?

We support both a strengthened principles-based requirement and specific standards around meeting connection dates, working together. The principles-based requirement should establish clear accountability for delivery to agreed dates. However, this must be supported by specific standards covering:

1. Maximum timelines between agreement of a connection date and completion of necessary works
2. Requirements to provide regular updates on progress towards connection dates
3. Clear processes for managing and communicating any necessary changes to agreed dates
4. Standards for coordination between parties where multiple organisations are involved in enabling connection

These requirements should recognise legitimate reasons for delay while ensuring DNOs take all reasonable steps to meet agreed dates. When delays do occur, DNOs should be required to provide detailed explanations and revised completion dates.

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 strongly support the introduction of a financial instrument to provide recourse when connection dates are not met. Our members' experience is that delays cause both direct financial losses and significant indirect costs that are currently not addressed through existing mechanisms.

Any financial instrument should be based primarily on the length of delay, with penalties increasing the longer a connection remains outstanding beyond its agreed date. However, the framework must also recognise the broader commercial impact of delays. Our members regularly face additional costs from having to reschedule contractors, renegotiate land agreements and miss contractual targets due to connection delays, and these costs should be considered too.

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 the issues identified but note several additional significant concerns based on our members' experience:

- Connection offers can prove undeliverable due to inaccurate or outdated network information. This creates significant wasted cost and time for charging providers who progress detailed design work based on offers that later prove unfeasible. Some DNOs work constructively with operators to offer alternative Points of Connection, for example, but this good practice is not consistent across the networks.
- The handling of curtailment in connection offers is often poor. Our members report receiving offers with unworkable levels of curtailment, including instances of 100% curtailment being offered for EV charging sites. This demonstrates a failure to understand the operational requirements of charging infrastructure.
- Standing charges are often not communicated until late in the process, sometimes revealing costs ten times greater than expected. This fundamentally affects project viability and should be clear at offer stage.

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?

While we support introducing principles around offer quality, we believe prescriptive requirements would be more effective in driving improvement. These should cover:

- Requirements for DNOs to validate network data, including as-laid records, before issuing offers. Our evidence shows that undeliverable offers based on incorrect network information cause significant wasted cost and delay.
- Standards for assessing and communicating curtailment risk, with specific requirements to model the impact on different types of connection customer. This is particularly important for EV charging, where unexpected curtailment can make projects unviable.
- Clear timelines for offer production, reinforcement works and delivery dates, with obligations to explain any deviation from these timelines. Transparency on DNOs' expected timelines for each phase of the process would be valuable for operators' planning and resourcing.
- Requirements to explore and present alternative connection options where available, supported by clear analysis of their implications.

These requirements should be backed by monitoring and reporting obligations to ensure compliance and drive continuous improvement.

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

A high quality connection offer gives customers the confidence and information needed to make informed investment decisions. It must start with accurate network information and a clear understanding of available capacity. The offer should explain any constraints or risks, particularly around curtailment, and their practical implications for the project.

For larger projects, the offer should consider options for staged or ramped capacity increases where full capacity cannot be delivered immediately. This flexibility is particularly valuable for EV charging infrastructure, where the ability to scale over time can significantly impact project viability.

The offer must provide transparent cost information and clear timelines for delivery, including any required reinforcement works and third party land rights requirements. Where alternative connection solutions exist, these should be presented with analysis of their relative benefits and drawbacks. Finally, the offer should set out clear next steps and contact points for progressing the connection.

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

We believe there are two additional issues regarding connection offers that merit consideration, specifically relating to public funding schemes like the Local Electric Vehicle Infrastructure (LEVI) fund:

1. First, the current 90-day validity period for connection offers does not align with public procurement timelines. When bidding for local authority tenders, CPOs must obtain connection offers for sites that may not be developed for months or years following a successful bid. By the time deployment can begin, these offers have expired. It would be sensible for DNOs to offer the flexibility for longer-term indicative quotes that can be tied to actual projected deployment dates.
2. Second, the current system creates inefficient duplication of work, as multiple CPOs bidding for the same tender must each obtain separate connection offers for identical infrastructure in the same location. This creates artificial demand signals and wastes resources for both DNOs and CPOs. We recommend introducing mechanisms to better manage these overlapping applications, such as area-specific pricing that would apply equally to all bidders, with only the successful bidder ultimately proceeding with the connection.

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 strongly agree with the identified risk that strengthened requirements around meeting connection dates could drive more conservative offers. Our members experience significant variation in DNO approaches, with some providing ambitious timelines and working collaboratively to meet them, with others defaulting to distant dates with limited explanation.

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 support the proposal for strengthened requirements around connection date ambition. Our evidence shows that where DNOs take a proactive approach to connection dates – for example, by clearly communicating available non-firm capacity or offering alternative connection solutions – projects can progress more quickly.

The requirement to provide revised offers when earlier connections become possible is particularly important. We have seen examples of good practice where DNOs actively monitor their network capacity and inform customers when opportunities for earlier connection arise. This approach should be standard across all network areas.

However, this requirement must work alongside robust obligations to meet connection dates once agreed. The regulatory framework needs to strike the right balance between encouraging ambitious timelines and ensuring deliverability.



Theme 6 – minor connections

We have understood this section of the consultation to refer to residential connections, which are not relevant for the majority of ChargeUK members. We have included key issues relating to on-street, unmetered connections at the lower voltages in our responses to other questions.

Theme 7 – provisions and guidance for determinations

Question 7a: Do you agree with the issues identified?

We strongly agree with the issues identified and believe the current determinations process requires significant reform. Our evidence shows that connection customers often struggle to understand when and how they can seek Ofgem's involvement in resolving disputes. This uncertainty creates additional burden for both connection customers and network operators, who may spend considerable time and resource pursuing inappropriate routes for resolution.

Question 7b: Views on reviewing determinations guidance

We strongly support the proposal to review determinations guidance. However, we believe this review should go beyond simply clarifying the current process. The regulatory framework needs strengthening to give Ofgem greater powers to intervene where connection customers face persistent issues.

The current system leaves connection customers largely alone in resolving disputes with network operators. This creates an imbalance of power that can lead to delays and additional costs. Charge point operators regularly face significant challenges in progressing disputes, particularly where issues relate to connection dates or design requirements.

We recommend the review considers:

- Creating clearer triggers for when Ofgem can become involved
- Establishing stronger powers for Ofgem to resolve disputes
- Developing standardised processes for escalating common issues
- Setting clear timelines for dispute resolution