**RE: Ofgem Consultation: ''Connections End-to-End Review of the Regulatory Framework’’**

Stoke-on-Trent City Council welcomes the opportunity to comment on Ofgem’s consultation regarding the ‘Connections End-to-End Review of the Regulatory Framework’, and appreciates the recognition of electric vehicle (EV) infrastructure as a critical component of sustainable transportation. Below, we share our thoughts and feedback on the points raised regarding EV infrastructure:

**1. Ofgem’s Regulatory Reforms**

The "Connections End-to-End Review of the Regulatory Framework" outlined in the bulletin is a promising step forward. We support Ofgem’s proposed reforms to prioritise ready-to-go projects (such as the ongoing LEVI Pilot and LEVI Capital projects) and to enforce stricter deadlines for network operators. These measures can significantly reduce delays in deploying EV charging infrastructure as DNO capability remains a hurdle for the validity of EVI in certain locations..

However, we recommend further emphasis on the following:

* Stakeholder Coordination: Enhanced communication channels between local authorities, energy providers, and EV infrastructure teams are essential to ensure these reforms address practical challenges in project execution.
* Capacity Building: Technical and financial support for local authorities will be crucial to help them assess readiness and accelerate project development.
* Grid Modernisation: Alongside reducing delays, grid capacity enhancements should remain a top priority to accommodate increasing demand for EV chargers, especially for high-capacity public transportation fleets.

**2. Alignment with Strategic Goals**

The alignment of energy planning with strategic transport goals is an important objective. We encourage the Department for Transport (DfT) and Ofgem to integrate these goals into a clear, actionable roadmap that:

* Identifies high-priority locations for EV charging stations, focusing on underserved and high-demand areas.
* Establishes timelines and milestones to track the progress of EV infrastructure deployment.
* Links public transport electrification plans with broader renewable energy initiatives to ensure sustainability.

**3. Transparency and Accountability**

We agree with the inclusion of transparency improvements and stricter penalties for poor performance. To further this objective, we suggest:

* Data Sharing: A centralised platform to share data on project status, grid capacity, and anticipated energy needs will help stakeholders make informed decisions.
* Performance Metrics: Introducing key performance indicators (KPIs) specific to EV infrastructure deployment, such as connection lead times and reliability, will drive accountability.

**4. Stakeholder Consultation**

We encourage DfT and Ofgem to:

* Facilitate targeted workshops for EV infrastructure teams to voice challenges and share best practices.
* Provide interim updates on the feedback received and how it will shape the final recommendations.

**5. Funding and Support**

While the bulletin outlines funding mechanisms for bus services, including BSIP funding, we urge the inclusion of dedicated allocations for EV infrastructure. This funding should also cover capability costings for local authorities to provide expert human resources to manage and deliver any potential infrastructure projects.

**Conclusion**

The Council’s EV Infrastructure team is optimistic about the direction outlined in the BSIP Bulletin and Ofgem’s regulatory review. By fostering collaboration, transparency, and focused investments, we can collectively accelerate the transition to cleaner, electrified public transport systems. We remain committed to supporting these initiatives and look forward to contributing to the consultation process.

The above response is from an EV Charging infrastructure perceptive.

**Orron**

Re Connections end-to-end review of the regulatory framework consultation.

As part of the ongoing Connections End-to-End Review of the regulatory framework, we would like to highlight a fundamental issue that we believe is at the core of the challenges facing the UK’s energy transition. While we frequently hear concerns about queue sizes, ‘zombie’ projects, and the need to reduce the numbers in the queue, our experience across multiple European markets—including Germany, France, Sweden, and Finland—suggests that the primary challenge in the UK is the ineffectiveness of Transmission Owners (TOs) in building out the necessary network infrastructure. Unlike their European counterparts, UK TOs have consistently failed to deliver the new capacity required to enable renewable projects to connect efficiently and UK investments in grid infrastructure significantly lag comparable markets. We also note that the approach adopted under the grid connections reform and clean power 2030 are already significantly hampering and slowing down investments into new projects due to increased uncertainty around grid access and market reform.

Many of the proposed reforms seem to focus on limiting the number of connection requests rather than addressing the real issue: the urgent need for increased transmission capacity. If there were sufficient grid infrastructure, queue sizes would naturally decrease, consumer bills would benefit from increased competition among generators, and the UK would make meaningful progress towards its net zero commitments. However, due to the monopolistic nature of TOs, their profits remain secure regardless of their underperformance in delivering essential new capacity.

Instead of focusing on accelerating network expansion, we find ourselves stuck in cycles of reform, consultation, and review—ultimately delaying renewable investment and undermining the UK’s attractiveness as a destination for international capital, slowing down the energy transition and move towards cleaner, cheaper energy and economic growth. If this fundamental issue is not addressed head-on, we fear that all other reforms will be in vain. Whilst we are encouraged by section 3 of this consultation, we urge regulators and policymakers to prioritise the expansion of transmission infrastructure as the key enabler of the energy transition. Without decisive action in this area, the UK risks falling further behind in its renewable ambitions and driving investment away to more proactive markets.

In terms of the consultation specifically, our biggest issue is the time it takes to get a response to any question and also the time it takes to get a connection agreement sent and signed by NESO. We have also set out some specific thoughts on question 3 and 8 in red below.

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? Yes this is accurate.

Are there any other issues under this theme that we should consider or be aware of? With no financial penalty on the TO’s, they have no incentive to get this right.

Proposals:

Question 3b.

Do you have any views on proposal 3a (strengthened principles based licence condition around meeting connections dates)? We agree that this should be a licence condition.

Do you have any views on specific wording that would achieve the intended outcome? No

Question 3c.

Do you have any views on proposal 3b (minimum standards / SLAs around meeting connections dates)? The TO’s should have milestones, exactly like the customers connecting do have. This should be based on a standard model, as the customer dates are.

Do you have any views on specific standards that could be introduced and how they would work in practice?

Question 3d.

Do you have any views on proposal 3c (a financial instrument designed to offer recourse to connecting customers who face detriment due to delays)? Yes, we absolutely believe that there should be some sort of liquidated damages type instrument that would be in force for delays.

Do you have any views on how this should be implemented? Include this in the GCA.

Anything else: 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? We are so worried about stranded assets, when the whole industry is crying out for more capacity. If we build it, the generation will come. Even if one project falls away, another one will take it’s place, if we get the investment opportunity / environment correct.

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. We prefer a mix between option 2 and 3. Driving SGT installation is a good idea and we would be very supportive of this. However, we also believe that the TO’s could easily increase capacity by non-SGT installation also, such as better modelling, leading to option 2 being a good proposal. We believe a balanced scorecard approach to this would work best.

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? We believe that the TO’s should be measured against how many renewable connections are made also in pure volume. This would ensure that they go for the quick wins first, building out renewable capacity more quickly and turning to those more challenging projects once the quick wins are completed towards the end of the RIIO period