

SYMCA Consultation Response

The South Yorkshire Mayoral Combined Authority supports the proposals to enhance data visibility, service standards, timely connections, and the quality of connection offers. We support the creation of a unified data platform and the establishment of standards for data visualisation tools, which would improve planning for transport electrification projects. Continuous updates to connection lists and the additional provision of data on voltage and thermal constraints are essential to enable better planning. We support the proposals for principles-based licence conditions, and conditions to ensure consistent and timely service delivery, along with financial instruments to offer recourse to customers facing delays.

We highlight the need for high-quality connection offers that align with local priorities including local area energy plans, community-led energy projects, and public transport electrification. We support the prioritisation of projects that deliver significant societal and carbon reduction benefits. Streamlined processes for minor connections and technical guidance for community-led energy schemes would be beneficial to support the rollout of heat pumps, distributed renewables, and EV charging infrastructure. Collaboration between local authorities, strategic authorities, and energy providers will better facilitate the planning and execution of electrification projects.

We would welcome simplified processes to enable grid connections for Vehicle-to-Grid (V2G) technology to improve grid stability. We believe it is important to enable faster and easier grid connections for regions such as South Yorkshire that have relatively unconstrained, strong networks. Faster grid connections will enable South Yorkshire to attract industry and accelerate major housing and employment sites, supporting a stronger local economy.

Theme 1 - Visibility and accuracy of connections data and network capacity (page 16)		
Proposals		
1a	A new regulatory requirement on DNOs, TOs and NESO to create, maintain and continuously improve single digital view tools to provide accurate, usable connections data to interested parties.	
1b	A new regulatory requirement on DNOs, TOs and NESO to create and maintain guidance / minimum set of standards for connections data visualisation tools.	
1c	A new regulatory requirement on DNOs, TOs and NESO to provide compiled system-level connections data on a regular basis for external publication	
Questions		Answer
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?	Agree: Solving issues around data consistency and visibility into local grid conditions would be beneficial. This would enable effective planning for transport electrification projects such as electric bus depots and electric vehicle charging infrastructure. Consistent formatting of data nationally would support non-technical stakeholders such as community energy enterprises.
1b	Do you agree with proposal 1a (new regulatory requirement on single digital view	Support: We support the creation of a unified data platform, which would

	tools)? Do you have any views on how this should be implemented?	enhance planning for initiatives such as EV infrastructure deployment and bus depot electrification. It would be beneficial if data could be imported or exported to enable integration with transport electrification layers such as local transport plans and existing and planned EV infrastructure, as well as integration with local area energy plans.
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?	Agree: Standards should include compatibility with spatial plans and transport datasets, and clear metadata guidelines to support local area energy plans.
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?	Support: We support the proposal to provide connections data, and think that this should be continuously updated to enable stakeholders to access the most up to date information.
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?	<p>Current Tools: Current tools may be inaccessible to non-specialist users, particularly for community-led energy projects. Co-design workshops with local authorities, strategic authorities and community stakeholders may address these gaps.</p> <p>Additional Data: Data on voltage and thermal constraints would provide increased understanding and enable better planning.</p>
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.	N/A
1g	Is there anything else regarding Theme 1 – Visibility and accuracy of connections data and network capacity that you consider we have missed?	N/A

Theme 2 - Improved standards of service across the customer journey (not including “minor connections”) (page 25)

Proposals

2a	Principles-based licence condition, and supporting guidance, on DNOs, TOs and the NESO around standard of service required throughout the customer journey, AND / OR,	
2b	New minimum standards licence conditions and/or SLAs on DNOs, TOs and the NESO around standards of service required throughout the customer journey. Minimum standards could be accompanied by incentive or penalty mechanisms to further drive compliance.	
Questions		Answer
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?	Agree: Improved standards of service are crucial for ensuring a smooth customer journey.
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?	Support: We support the introduction of principles-based licence conditions and supporting guidance to ensure consistent service quality throughout the customer journey.
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?	Support: We support the introduction of new prescriptive conditions around standards of service to help ensure timely and effective service delivery.
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?	N/A
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?	N/A

Theme 3 - Requirement on networks to meet connection dates in connection agreements (page 33)	
Proposals	
3a	A strengthened principles-based licence requirement for DNOs, TOs and the NESO to ensure that they meet connection dates in connection agreements, and to provide timely and accurate information to developers in relation to issues that may impact their connection date or project viability.
3b	Minimum standards licence condition or SLAs for DNOs, TOs and NESO to ensure they meet connection dates in connection agreements and key timelines through the

	customer journey. Minimum standards could be accompanied by incentive or penalty mechanisms to further drive compliance.	
3c	A financial instrument that offers recourse to connecting customers who suffer detriment, such as a delayed connection date, due to poor practice on the part of the network company.	
Questions		Answer
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?	Agree: Ensuring networks meet connection dates is critical for project viability.
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?	Support: We support the introduction of strengthened principles-based licence conditions to ensure networks meet connection dates.
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?	Support: We support the introduction of minimum standards or SLAs around meeting connection dates to drive compliance.
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?	Support: We believe it is reasonable to have a financial instrument designed to offer recourse to connecting customers who face detriment due to delays.
3e	Is there anything else regarding Theme 3 - Requirement on networks to meet connection dates in connection agreements that you consider we have missed?	N/A

Theme 4 - Quality of connection offers and associated documentation (page 39)		
Proposals		
4a	Principles-based licence condition on DNOs, TOs and the NESO on the completeness / quality of the offer and supporting documentation provided to customers in a timely manner, both at the initial offer stage and at subsequent offer update events.	
4b	Minimum standards licence condition and/or SLAs on DNOs, TOs and the NESO on the completeness / quality of the offer and supporting documentation. Minimum standards could be accompanied by incentive or penalty mechanisms to further drive compliance.	
Questions		Answer
4a	Do you agree with the issues we have set out under Theme 4 - Quality of connection offers and associated documentation? Are there	Agree: The identified issues are valid.

	any other issues under this theme that we should consider or be aware of?	
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?	Support: We support the introduction of principles-based licence conditions on the completeness and quality of offers and supporting documentation.
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?	Support: We support the introduction of minimum standards/SLAs on the completeness and quality of offers and supporting documentation.
4d	What do you consider would constitute a 'high quality offer'?	A high-quality offer should align with local area energy plans, enable community-led energy projects, and support projects that demonstrate good feasibility of delivery. Offers should be clear to remove barriers for non-technical stakeholders such as community energy enterprises.
4e	Is there anything else regarding Theme 4 - Quality of connection offers and associated documentation that you consider we have missed?	N/A

Theme 5 – Ambition of connection offers (page 44)		
Proposals		
5a	A strengthened principles-based licence condition on DNOs, TOs and the NESO to offer the earliest achievable connection date to the customer, and to provide revised offers in a timely manner if it later became possible to connect the customer more quickly.	
Questions		Answer
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?	Agree: We are already seeing the provision offered being more flexible.
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?	Support: We support the introduction of strengthened principles-based licence conditions to ensure networks offer the earliest achievable connection dates.
5c	Is there anything else regarding Theme 5 - Ambition of connection offers that you consider we have missed?	Additional Consideration: We recommend prioritising projects aligned with local area energy plans

		and local decarbonisation strategies, such as those supporting public transport electrification and electric vehicle charging infrastructure. Consider special designations or "fast-track" connection pathways for these projects that deliver significant societal and carbon reduction benefits.
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Theme 6 – Minor connections (page 48)		
Proposals		
6a	Delays / Timelines – we propose as a minimum to set principles-based licence obligations for DNOs and/or guidance to define clear objectives and expectations for timelines and delays, AND / OR, set Service Level Agreements (SLAs) and/or minimum standards that DNOs are obliged to meet for minor connection requests, including but not limited to increased transparency, standardising of approaches to the highest standard achievable and defining criteria for auto-approvals.	
6b	Inconsistencies – we propose as a minimum to set obligations on DNOs to determine how best to align their processes to ensure high standards are set and consistent across the processes discussed in this theme, and where appropriate, meet the SLAs/minimum standards.	
6c	Monitoring – we propose to consider monitoring SLAs and/or minimum standards with compulsory reporting from the DNOs, and/or publishing the resulting data as aligned to SLAs and/or minimum standards if set.	
6d	Enforcement– we propose to consider whether the current arrangements for financial recourse are sufficient for minor connection customers, and if not, whether there is a need for a consumer body, or an improvement of what already exists for connection customers, to ensure minor connections are facilitated to a high standard and in a timely manner. This includes consideration of whether expanding / extending the GSOPs for minor connection customers would deliver better outcomes.	
6e	G98 Limit - We propose to set an obligation on DNOs to review their policy towards the G98 limit, including increasing the current limit unless there is a justification of why uplift is not in the consumer interest, or could have unintended consequences for the network. This would allow more connections to proceed as ‘Connect and Notify’.	
6f	Notifications - We propose to investigate how to strengthen the notification obligation on LCT installers, i.e. where they must notify the DNOs of all new LCT connections.	
Questions		
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.	Agree: Identified issues are valid.
6b	What are your views on our proposals designed to address these issues? Are there other proposals you consider would achieve the intended outcomes?	Support: We support streamlined processes for minor connections. We are supportive of measures that would enable the rollout of heat

		<p>pumps, distributed renewables, and electric vehicle charging infrastructure. Technical guidance for community-led energy schemes would enable them to effectively navigate the minor connections process.</p> <p>Additional Proposal: Enabling Vehicle-to-Grid (V2G) connections at bus depots and other facilities can provide valuable frequency response services, helping to maintain grid stability. Streamlining the process for V2G connections would support the integration of this technology and enhance the resilience of the grid.</p>
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?	Consider monitoring SLAs and/or minimum standards with compulsory reporting from DNOs and publishing the resulting data. Introduce financial recourse for connection customers where SLAs are not met.

Theme 7 - Provisions and guidance for determinations (page 56)		
Proposals		
7a	Ofgem to review the guidance for connection determinations with a view to updating it if changes are considered appropriate / necessary for the current connections process and landscape.	
Questions		
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?	N/A
7b	Do you have any views on proposal 7a (Ofgem to review the guidance for connection determinations)?	N/A
7c	Is there anything else regarding Theme 7 - Provisions and guidance for determinations?	N/A

RIIO T3 – Electricity Transmission Network Incentivisation (page 60)	
Proposals	
<p>“We are concerned that the existing RIIO-ET2 incentives have enabled the TOs to earn rewards at a time when the transmission connections queue is at historically high levels with instances of customer dissatisfaction not uncommon. We therefore decided to develop a new incentive structure to drive faster connections times and a more effective overall connections process, which would replace the two existing connections ODI-Fs.</p>	

We have narrowed those solutions down to three options, which are set out below. Our working assumption is that these options would be mutually exclusive. In response to this consultation we welcome any views on the options presented, as well as any additional proposals stakeholders believe we should consider not presented here.”

1	A Post Price Control Performance Review
2	Connection Timeframes
3	Supergrid Transformer Capacity

Questions		
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.	N/A
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?	N/A