

Theme 1 - Visibility and accuracy of connections data - useful data must be made transparent to connecting customers and other interested parties in order to inform customers connection applications

We agree that a digital tool that demonstrates accurate, real-time connections data would be highly beneficial. It would give connecting customers like us a clear idea of entry-point viability for projects. This would hopefully translate into a reduced number of applications that materialise into higher-quality connection offers, resulting in much less time wasted by both customers and DNOs.

As the grid becomes increasingly congested, the current lack of transparency is becoming more of an issue. Fastned often needs to submit for several new connection applications at any given location in order to explore the maximum load available for a site.

We believe that any tool would need to be introduced in a standardised format across all DNOs. The tool cannot be dealt with separately by each individual DNO as inevitably some would produce a better system than others. This could lead to an increase in applications in DNO regions where the tool is most accurate; the current connection queue would not be reduced but rather get concentrated into specific areas.

Thinking further, this tool could also be used as an opportunity to precipitate greater standardisation across the DNO regions. The tool could be extended to incorporate the application process. This would allow the connections application process to be made identical across all of the DNOs. This would create a clearer, less confusing system that is up-to-date and fit-for-purpose (unlike existing systems such as SPEN's RAdAR).

The tool would also need to provide detailed information. Simply showing how much headroom capacity is available at primary substations is not a great deal of use. The tool would ideally provide the specific capacity available and identify the possible point of connection location. If this is not available, purposeful and targeted applications still cannot be made.

If such a tool was successfully implemented, it would reduce the oversubscribed connections queue issue. The gains/savings made here would therefore need to be reinvested into improving limited network capacity.

Theme 2 - Improved standards across the customer journey - connecting customers must receive a high standard of service at all stages of the customer journey, from pre-application to energisation.

We agree that high standards of service need to be across all stages of the connections journey, not simply concentrated on the applications/offer stage.

Improved standards are desperately needed on projects that are dependent on reinforcement works. There currently seems to be a complete lack of communication post-offer acceptance in schemes that are dependent on reinforcements. When information is sought, there appears to be internal confusion within the DNOs regarding who can provide this. Any information received is vague and often misleading. For example, at our site in Balhaldie (SSE ref: EZW675). Here, we accepted a 1500kVA connection in September 2023. This connection is dependent on reinforcements; nearly 18 months since we accepted and paid for the scheme, all SSE have told us is that the works will take roughly 3-4 years to complete. We have no concrete timeframes, no direct contacts and no certainty of when the works will actually complete.

We would also like to see more transparency when looking at DNO performance alongside the service levels that they are regulated against. For example, the timeframe required to provide a connection date. It is very clear what happens to the customer if they do not meet milestones/timeframes, however, to us, it seems the DNOs have very little accountability. This was evidenced when attempting to energise our connections in Haydock (ENW ref: 5500244454) and Basildon (UKPN ref: 8200051256). At both sites, we were not given an energisation date within 20 working days. This had apparently no consequences for the DNOs concerned.

To provide a better service, network companies must improve their understanding of individual customer needs. Not all projects are the same and therefore standardising timeframes/services is not always appropriate. Raising the standard of service must mean meeting the specific needs of the customer and not adopting a one-size-fits-all approach. To explain, our sites are much more complex than others, they have higher planning risk and more consent requirements (such as S278 for new highway access points) that take longer to realise yet we still need to secure our grid connection offer early to ensure a site is viable as we spend hundreds of thousands of pounds to design and obtain all necessary consents.

Finally, putting greater emphasis on service across all stages of the connections journey should not distract from the fact that service at the application/offer stages is still generally poor (ad hoc, unresponsive and vague communication). Improving communication across the wider connections journey does not mean that the initial stages do not need improvement too.

Theme 3 - network companies being required to meet connection dates in connection agreements - there should be proportionate requirements on network companies and NESO to meet agreed customer connection dates in connection agreements, commensurate with those on developers to meet project milestones

We strongly encourage a regulatory framework that ensures there are proportionate requirements on network companies to meet agreed customer connection dates. It currently feels that increasing requirements are being put on connecting customers to meet certain milestones/dates (with big consequences if these dates cannot be met), however, DNOs are not

held accountable. This is echoed in the when obtaining grid-related consents; the customer is held ransom to strict time pressures, yet any legal matters involving the network companies are addressed with an apparent lack of urgency. A clear regulatory framework that ensures the DNOs meet their requirements would also help to overcome the aforementioned issues surrounding reinforcements.

Further to our above suggestions, we believe that regulatory requirements should be more bespoke to the project at hand. Current milestones being imposed (to ease the connections queue) are completely unrealistic; they do not align with the logical processes of securing land, planning permission and power simultaneously. The current system of cancelling schemes if milestones are not met in fact exacerbates the connections queue as it leads to increased administration and duplicate applications. It is our hope that with a more nuanced, two-way information exchange, customers could be regulated based on their specific needs and be understood as more than simply a number reserving capacity in a queue. In turn, this would allow the customer and the DNO to understand each other's requirements better, allowing more viable projects that make more realistic progress.

Theme 4 - Quality of connection offers and associated documentation - network companies and NESO should be suitably required to issue high-quality offers and associated documents and information to connecting customers

A regulatory framework that drives the creation of high-quality offers and associated documents/information is much needed.

At present, the connection offer process is far too rigid and has very limited scope to allow high-quality connection offers to be made. Any regulatory framework that is put in place, needs to allow the application process to become more qualitative. As previously mentioned, connecting customers are currently only understood in terms of how much capacity they require (and when they applied for this capacity). If connecting customers could be seen as individuals with unique and specific project requirements, DNO planners would be able to produce much more suitable, higher-quality offers.

Taking this further, greater (and regulated) collaboration between connecting customers and DNOs is needed in situations where requested connections are not possible. At the moment, when an unsuitable connection offer is provided by the DNO, there is essentially no scope for comment, revision or compromise. If additional information is given, it is entirely dependent on the humour of the individual project planner. In most cases, if alternative connection routes are sought, a completely new application is required. For example at our site in Northop (SPEN ref: S123582, S262827), to date, we have made four separate connection applications in order to get a clear picture of what the network is able to offer at this location. This is clearly costly and completely inefficient and further exacerbates the oversubscribed connection queue. For us

then, higher quality connection offers must be understood as offers that are adaptable and bespoke to the project at hand.

Moreover, on a practical level, we also believe there needs to be standardisation in the formatting of connection offers. The current system of providing long documents with huge amounts of irrelevant information adds to the overall inefficiency and confusion within the system. Important information is easily lost amongst pages of terms and conditions (eg, NGED tightly enforce milestones but give no clarity of real dates that need to be met). Offers should be technically concise and outline key features of the connection and any crucial dates that the customer should be aware of.

Theme 5 - Ambition of connection offers - network companies and NESO should be suitably required to offer connecting customers ambitious connection dates, to ensure they are doing everything possible to expedite connections

We appreciate that if DNOs become more heavily regulated in terms of time, they may be naturally incentivised to self-preserve by offering conservative connection dates. In this vein, regulation that requires network companies to offer ambitious but achievable connection offers is needed.

Following on from our response to Theme 4, regulation could be differentiated between straight forward connections and those that are more complicated/bespoke to the individual connecting customer. This would allow ambition to persist whilst greater flexibility is cultured.

As previously mentioned, greater transparency around regulation (how DNOs are regulated and the consequences if they fail to meet standards) would allow connecting customers to get a better picture of the impact that regulation actually has on the network companies. It should also be noted that we currently have an issue not only with conservative connection dates but also vague connection dates. More detail needs to be given with regards to how connection dates are calculated.

Theme 6 - Minor connections - minor connections, ie those seeking to make connections at low voltages (such as domestic and small business customers installing heat pumps or electric vehicle charge points) should receive a prompt and consistent high standard of service from network companies

This section does not concern the type of connections that Fastned deals with.

Theme 7 - Provisions and guidance for determinations - there should be greater clarity and transparency for all parties on the determinations process, including on Ofgem's role in managing complaints and issuing determinations

The connections landscape has changed significantly over the past few years. There is a rising number of disputes. From our perspective, if action is required, it only seems to be the connecting customer who is required to respond; we run the risk of losing our connections should we not meet the seemingly random timeframes set by the DNOs. By the same measure, we are frequently ignored by network companies when chasing for resolution. There appears to be no consequences if the network companies act in this way. This is particularly prevalent with connections in NPG region. Over the past 12 months NPG have attempted to close 3 of our accepted connections (refs: ENQ23135116, ENQ23065898, ENQ23109999). In each of these cases, attempts to find resolution have been entirely one-sided with all impetus and effort coming from us, the customer.

This issue is also acutely evidenced when trying to discover the outcome of interactivity. In some cases, we have chased for over 5 months (eg SSE ref: FPC042 and FCR729) to get information on the process. Again, in these situations, the customer has to commit to strict timeframes, however, the DNO does not. In order to get a response, we are required to make increasing numbers of formal complaints. This process does usually bring resolution however, is time-consuming and frustrating. With this in mind, we believe Ofgem's position in determinations is currently highly ineffectual. We need to know what role Ofgem are playing, how they are regulating determinations and how this approach can be improved.