

To: RIIO-3 Network Price Controls Team  
[RIIO3@ofgem.gov.uk](mailto:RIIO3@ofgem.gov.uk)

Date: 26<sup>th</sup> August 2025

Dear Network Price Controls Team,

## RIIO-3 Draft Determinations Consultation Questions: ET Annex

### Overview

Eclipse Power Group is pleased to respond to this consultation. We operate within several areas of the electricity sector. We are a leading Independent Distribution Network Operator (IDNO), we run a skilled and efficient grid consultancy, and we are a microgrid and private networks specialist. Collectively, we bring together a team of experienced electricity industry experts.

The RIIO-3 Draft Determinations are largely beyond our area of operations, but they do touch on at least one area which impacts us directly, the efficient delivery of grid connections. We have been actively involved in the current Connections Reforms at all stages, and spend a considerable part of our time working with, and guiding customers who are seeking to connect to the grid at Transmission as well as Distribution voltages. We know the value that timely connections create, and the adverse impact of delays and complex processes. We believe that it is in all parties' interests that strong incentives (and penalties) remain in place to encourage network operators to engage quickly and efficiently with connections requests. We have accordingly decided to respond to questions ETQ6 and ETQ7 which concern TO financial Output Delivery Incentives for Connections Capacity.

### Responses

**ETQ6 Which of the two proposals for the Connections Capacity ODI-F target setting methodology do you think is most appropriate and why?**

We agree with OFGEM that Option 1 is likely to provide the better results. It is more focused on getting projects connected - ultimately what all developers want to see. The financial reward or penalty, dependent upon the results, provides a simple and effective driver to support this.

Additionally, by focussing on TO performance in connecting the generation projects prescribed in the newly reformed connections queue, it helps to provide a clear indicator of national progress towards the delivery of CP2030.

We note that "large demand" is becoming a huge issue too, so suggest that the strategic focus of the ODI-F be adjusted to include this, over and above CP2030.

**ETQ7 Do you have any further considerations on our chosen direction for a RIIO-ET3 Connections Capacity ODI-F, including detail on how the targets could be built up?**

OFGEM states that it is minded to remove the ODI-F for the TO Quality of Connections Surveys.

We believe that the "customer voice" is very important, and often seems not to be clearly heard when industry plans and procedural changes are put forward. Without the QoCS, this voice will be quieter still.

We note and agree with OFGEM's concerns about small sample sizes. Strengthening the QoCS rather than removing it would seem to be a better approach. The number and diversity of customers is increasing as new technologies seek to connect to the grid, so tapping into their experience will only increase in importance.

We suggest that these changes be considered to add value to the QoCS:

1. Improve the quality of the questions that need to be asked, and mandate a "Net Promoter Score" methodology.
2. The questions should be more joined up in getting to the heart of TO, DNO and Customer relationships and how they are functioning.
3. Add minimum standards for engagement and follow-up.
4. Data gathering methodology should be improved. Current questions are often project-by-project, and may be conducted by phone, by marketing agencies. If the calls come at inconvenient times, and the questions are cumbersome, the results for and value of the QoCS will be adversely impacted. Ongoing periodic surveys focussing on holistic customer experience rather than project-by-project may offer more insight.
5. Consider adding more heft by increasing the penalties for poor performance.

We believe that having the QoCS as an ODI-R is a minimum requirement, but observe that reputational results may not get as much attention as financial ones. As an ODI-F, customers' experience would be given much more visibility at C-suite levels in the TOs. Delivering the planned customer connections in the RIIO-ET3 period is critical to CP2030.

Providing that it can be strengthened as suggested above, and the sample size of customers broadened and deepened, we believe that the QoCS ODI-F should be retained.

We are happy for this response to be treated as non-confidential.

Kind regards,

*W D Scott*

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