



Tristan Bishop  
Transmission Network Planning  
Ofgem  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

Fiona Morrison  
Head of Regulation  
Green Gen Cymru  
Hodge House  
Guildhall Place  
Cardiff  
CF10 1DY

1<sup>st</sup> September 2025

By Email to:  
[strategicplanning@ofgem.gov.uk](mailto:strategicplanning@ofgem.gov.uk)

[Fiona.Morrison@greengencymru.com](mailto:Fiona.Morrison@greengencymru.com)

Dear Tristan,

### **Consultation on the draft Centralised Strategic Network Plan Guidance**

As an IDNO, Green GEN welcomes the opportunity to contribute to the above consultation.

Green GEN Cymru ('Green GEN') is a licensed Independent Distribution Network Operator ('IDNO') pioneering the UK's largest linear distribution network outside of traditional frameworks. Green GEN's network is critical for connecting up to 3.3 GW of new generation and demand capacity in Wales. Whilst IDNOs are more commonly associated with owning and operating smaller sections of the UK's distribution networks, Green GEN differs in developing over 300km of new 132kV distribution grid network infrastructure across Wales, connecting rural communities which suffer some of the largest grid constraints. The distribution network is crucial to the electricity system. The proactive investment and development which Green GEN is making in Wales will ensure capacity is delivered efficiently to support decarbonisation and the economy.

The boundary between transmission-led and distribution-led solutions is becoming increasingly blurred, particularly with growth of embedded generation, co-location of flexible assets, and new developments served by IDNOs. Within the Clean Power 2030 Plan, published by the UK Government in December 2024, expanding and upgrading distribution network is recognised as being a critical lever to delivering the 2030 target.

To ensure that the CSNP delivers its goals effectively, it must more explicitly account for the role and needs of electricity network companies other than Transmission Owners. IDNOs operate in the most competitive part of the lower voltage sector and are best able to offer innovative approaches and solutions.



In its Clean Power 2030 advice to the UK Government the National Energy System Operator (NESO) identified unlocking flexibility of demand and supply as a priority for clean power. To do this the distribution network must be strengthened as significant growth of distributed flexibility will be fundamental for delivering a decarbonised electricity system.

We are therefore frustrated at the lack of transparency around how DNOs and IDNOs will be accounted for within NESO's strategic planning work.

We are particularly concerned by paragraph 1.3 of the Guidance consultation:  
*"...It has proposed that the electricity infrastructure in the CSNP will be endorsed in the NPS. This will mean that the needs case and technology type for projects that adhere to the recommendations of the CSNP, do not have to be examined in the consenting process."*

While we appreciate that not all projects will be assessed to be viable as part of the CSNP, by failing to consider anything other than transmission infrastructure other developers are immediately at a disadvantage. The exact consequences of being excluded from the strategic plans remain uncertain however, it is to be expected that such exclusion will impact both investment and the likelihood of consent being granted. If planning and consenting bodies are essentially 'told' which projects will be moving forward they may not consider other applications, or could overlook other projects, because they are not 'part of the plan'.

We have set out further comments in relation to the specific chapter questions in the Appendix to this response.

We welcome the opportunity to meet with Ofgem, NESO and DESNZ to discuss our concerns with the approach to the CSNP and wider strategic planning work.

Yours Sincerely

Fiona Morrison  
Head of Regulation – Green GEN Cymru



## Appendix 1 – Consultation Questions

### Chapter 2 - Developing and submitting the CSNP Methodology

Do you agree that Chapter 2 – developing and submitting the CSNP Methodology - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree

We welcome confirmation that Ofgem will have oversight of the methodology and will send back, and direct amendments, should the methodology not align with the stated objectives. Transparency around the criteria and processes Ofgem will employ to assess the methodology would be beneficial.

The CSNP contents requires that it must define clear data inputs, modelling methods and details of analysis so that users can clearly understand it, and outputs and areas of engagement and cooperation with relevant stakeholders. It also requires that consistent and transparent criteria are applied by the licensee. We agree that these elements are crucial to ensuring that the CSNP methodology meets its objectives.

In addition to oversight by Ofgem, we propose stakeholders should also be given the opportunity to comment, challenge and seek clarity on the methodology and NESO's decision making.

### Chapter 3 - General requirements applying to all CSNP stages

Do you agree that Chapter 3 – general requirements applying to all CSNP stages - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

By not recognising IDNOs as Network Owners, the CSNP is unlikely to fully meet its policy intent.

Excluding IDNOs risks developing a solution that is not reflective of the whole energy system, potentially leading to inefficiencies—up to and including the duplication of plans.

There are also clear additional benefits to including IDNOs from the outset. For example, paragraph 3.25 of the CSNP highlights the importance of data sharing for clarity and consistency. Taking an inclusive approach now will be significantly more efficient than retrofitting systems and methodologies later. The Market-Wide Half-Hourly Settlement (MHHS) programme provides a relevant precedent, illustrating the challenges of adapting existing systems to accommodate new requirements.

Membership of the working-level governance body should include:

- IDNOs
- Distribution Network Operators (DNOs)
- Representatives from:
  - Large-scale generation



- Flexible generation
- Renewable generation

If, for any reason, direct inclusion of all these stakeholders is deemed unfeasible, an alternative would be to establish sub-groups for each stakeholder category. Each sub-group would nominate a representative to sit on the main governance body, ensuring balanced and informed input across the industry.

We welcome the pragmatic approach Ofgem has proposed for managing the resolution of disagreements. This will enhance the efficiency of the CSNP development as well as the effectiveness of its solutions.

### **Stage 1: model future energy supply and demand**

Do you agree that Chapter 4 – Stage 1: model future energy supply and demand - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

The scope of the CSNP should be extended to consider other network providers like IDNOs. Unless distribution networks are considered, the outcome will not be a “whole system CSNP” and will therefore not achieve the policy intent.

### **Stage 2: identifying system needs**

Do you agree that Chapter 5 – Stage 2: identifying system needs – adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

Despite the expectation that the licensee should consider future changes it is being enabled to overlook a key component – local flexibility, or flexibility provided by domestic consumers connected to IDNO networks and the solutions offered by IDNOs.

Communicating the CSNP system needs to interested stakeholders must be done so as not to exclude any relevant stakeholders. For example, by using TO network focused forums which do not include important stakeholders.

### **Stage 3: identifying options**

Do you agree that Chapter 6 - Stage 3: identifying options - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

We do not disagree that the policy intent of the CSNP is met by Stage 3. We are however concerned by the lack of clarity around the criteria that will be applied to assessing the eligibility of options.

While the guidance suggests that transparent criteria should be considered, it does not establish a requirement for licensees to involve stakeholders in the development or



review of these criteria. Nor does it provide assurance that the criteria will be equitable and consistently applied across all parties.

#### **Stage 4: decision-making framework**

Do you agree that Chapter 7 - Stage 4: decision-making framework - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree

#### **Stage 5: develop the CSNP**

Do you agree that Chapter 8 – develop a CSNP - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

We welcome Ofgem’s guidance that, given the complexity of the CSNP, it is important that all users understand the detail behind this. NESO’s role is inherently complex and cannot be replicated by other participants. Ensuring the CSNP can be understood by all parties will increase its effectiveness as confusion will be avoided.

We would welcome discussion with Ofgem and NESO, perhaps also including DESNZ to understand what the anticipated outcome if a project is not included in CSNP that a developer intends to progress.

#### **Stage 6: handover to delivery body**

Do you agree that Chapter 9 – Stage 6: handover to a delivery body - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

#### **Other planning roles in CSNP**

Do you agree that Chapter 10 – Other planning roles in CSNP - adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

We’re proposing that offshore connections should be planned within the scope of the CSNP. We set out our requirements on the licensee with regards to this additional scope (see chapter 10: Electricity - offshore network planning in the CSNP). What are your views on this proposal?