

GETLINK PROJECTS 2
LIMITED



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BY EMAIL ONLY

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Dear Ofgem Connections Team,

Consultation: Connection and Use of System Code (CUSC) CMP448: Introducing a Progression Commitment Fee to the Gate 2 Connections Queue

Getlink Projects 2 Limited ('Getlink') welcomes the opportunity to respond to Ofgem's minded-to position on the Progression Commitment Fee (PCF) Proposals ("the Consultation").

Getlink is a key player in mobility infrastructures, international transport and a leader in eco-responsible transport in Europe. Getlink is committed on a daily basis to facilitating trade, supporting economic activity between the UK and continental Europe and creating value for all its stakeholders, by bringing people, business and culture together.

Getlink has extensive experience in developing interconnector projects and operating interconnector infrastructure. Under the Getlink portfolio is Eleclink, a 1GW HVDC electricity interconnector between Great Britain and France. Commencing full operations in May 2022, Eleclink has helped strengthen the security of energy supply between Great Britain and France and is also the first HVDC electricity interconnector between Europe and the UK which is fully protected against sea-based threats.

Getlink is currently in the early stages of development of a new 1GW GB-France interconnector through the Channel Tunnel and is the preferred future project of choice on the GB-France border by CRE and RTE¹. This project is referred to as Eleclink 2 (previously Cobalt).

Q1. Do you agree with our minded-to position to approve the Original Proposal of CMP448? Please provide reasons for your answer.

Getlink support Ofgem's minded-to-position to approve the Original Proposal of CMP448. We hold that the PCF in its proposed form will promote the health of the connections queue by providing additional incentives to project developers to regularly access the viability of their projects and

¹ [Opportunity for new electricity interconnection capacity between France and the United Kingdom | CRE](#)

efficiently self-terminate if/when a project becomes unviable. We believe that this is especially important following the Gate 2 to Whole Queue exercise (G2tWQ), with this process providing little certainty that a project which achieves the Gate 2 criteria will continue developing at pace, particularly where a Gate 2 Agreement is achieved on the basis of historic land rights.

By promoting more regular project reassessments, we expect the PCF to contribute towards the advancement of viable projects. Those projects which are truly viable should not be negatively affected by the PCF, should it be triggered, given their ongoing commitment to project advancement, which would include timely application for planning consent. In contrast, by incentivising non-progressing projects to remove themselves from the queue the PCF should clear the path for the more efficient connection of viable projects.

Getlink also maintains that the timeframe to which the PCF is applicable seems appropriate, given the level of control that a project developer has over the M1 milestone (Initiated Statutory Consents and Planning Permission) and the backloading of existing securities across the later milestones.

Whilst Getlink is supportive of Ofgem's minded-to-position and agrees with the concept of the PCF overall, we hold that further consideration should be given to the potential advantages of WACM2. As outlined by both Ofgem and the NESO, a "healthy" reformed connections queue will include the presence of developers electing to self-terminate projects where they are determined as unviable. It seems that given the WACM2 proposal would incentivise this self-review and termination to a greater extent than the Original Proposal that it should be explored further. We recognise the concerns expressed by Ofgem regarding the potential of WACM2 to incentivise project developers to delay self-terminations, however we believe that this is an issue regarding the current drafting of WACM2 and not a fundamental flaw associated with the principle of the proposal.

As under the WACM2 proposal the fee associated with self-termination remains linked to the PCF, albeit discounted, developers will continue to be incentivised to undertake regular and prompt viability assessments as the charge associated with self-termination will also continue to rise with every six months that passes. We believe that the flaws associated with WACM2 relate to the specifics of its drafting regarding the value of the discount and most importantly the deadline. It seems feasible that such metrics could be redesigned to mitigate such a risk of delayed project terminations and in turn unlock the benefits offered by WACM2 to greater incentivise self-termination over the Original Proposal. We believe this is especially the case in circumstances where the maximum rate of £10,000/MW has been met. In this scenario projects which have become unviable would have no incentive to self-terminate over waiting for the M1 deadline to be reached. In contrast, a reworked WACM2 would continue to promote early self-termination in all scenarios. On this basis, we recommend that Ofgem further considers the possibilities offered by the WACM2 proposal including the necessary adjustments required to address the identified risks.

More widely, Getlink continue to support the use of discretion within the PCF framework, ensuring that activation of the PCF is always the right decision based on the prevailing market conditions at the time of the threshold being met. Moreover, Getlink strongly support's Ofgem's involvement in the PCF activation process, especially Ofgem's power to veto a decision taken activate the PCF. Similarly, we advocate for the highest levels of transparency as NESO monitors the health of the queue, as and when the activation threshold is met and through NESO and Ofgem's decision making process. Additionally, we strongly support the three-month notice period proposed by NESO

between approval of the PCF activation and its implementation. This notice period will provide a critical window for developers to review their projects, their overall planning strategy and how best to mitigate the upcoming PCF exposure.

Finally, we note that within the Original Proposal, NESO outlines that once the PCF has been activated for a particular 5-year period it cannot be deactivated. Whilst we appreciate the simplicity offered by this approach, we would welcome further consideration of the market conditions which might allow the PCF to be deactivated to prevent unintended consequences from historic or outdated PCF activations.

Q2. Do you have any further remarks, comments or concerns with our minded-to position or the accompanying Impact Assessment, that you would like us to take into account?

Getlink wishes to take this opportunity to reflect our concerns over the timeline associated within this consultation. Whilst we understand and support the need for urgency throughout the development and implementation of this proposal, a consultation period of only 2-weeks will undoubtedly impact the quality and range of stakeholder feedback which can be captured. To promote the quality of both the consultation and the proposal itself, greater time and emphasis must be placed on stakeholder engagement throughout the CMP448 code change process.



Eleclink 2, CEO