



National Grid Electricity Distribution



Dear [REDACTED]

Re. Response to the Minded-to Consultation on CMP448: Introducing a Progression Commitment Fee to the Gate 2 Connections Queue

I am writing on behalf of National Grid Electricity Distribution (South Wales) plc, National Grid Electricity Distribution (South West) plc, National Grid Electricity Distribution (East Midlands) plc and National Grid Electricity Distribution (West Midlands) plc, collectively known as “NGED”, in response to the “**Minded-to Consultation: Connection and Use of System Code (CUSC) CMP448: Introducing a Progression Commitment Fee to the Gate 2 Connections Queue**”, which opened on 20 October 2025.

We welcome the opportunity to respond to this consultation, in which we highlight our position as presented through the CMP448 Workgroup Consultation. We also seek clarity on a number of points captured within the Minded-to decision for Ofgem to consider ahead of final decision on CMP448. Our thoughts on these points are captured under the consultation question responses below.

Should you have any questions about the points raised in this consultation, please reach out using the details below. We will continue to engage fully with NESO and other key stakeholders on ensuring the required processes are in place for delivery of CMP448 if approved.

Yours faithfully,



Connections Policy and Reform Manager, NGED



Responses to consultation questions:

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

No, we do not agree with the minded-to position to approve the Original Proposal. We believe the Original Proposal and alternatives raised through the Working Groups don't better facilitate the Applicable Objectives for connections in CUSC. Our preference would be for the baseline.

We do not believe the stated defect this code modification seeks to address exists. Effective application of ENA Queue Management milestones ensures those in the queue are progressing. Slow moving projects actively managed out of the queue. NGED have taken a strong position managing milestones, applying these to all generation and demand connections with a capacity greater than 69kW. Robust application of Queue Management milestones would have the desired impact, without placing additional financial burden on customers as is proposed here. Connections Reform has, to some extent, limited the ability for Queue Management milestones to demonstrate their impact, as these ceased to apply to projects in scope of reform. Notably, these were also projects that had initially incorporated Queue Management provisions into their contracts. This should not be misconstrued as that they cannot have the desired impact that the PCF seeks to achieve.

We do not feel that the approach outlined in the proposal is appropriate. We request further consideration is given by Ofgem when assessing whether the level of financial commitment proposed in WACM1 or WACM2 is more appropriate. We are particularly mindful of the impact on smaller developers and community energy groups connecting to the distribution network. The costs and uncertainty arising from the PCF could become prohibitive for an otherwise viable project.

We do agree with the Trigger Activation Governance process as outlined under the Original Proposal. This ensures the decision to activate the PCF is considered by both NESO and Ofgem. We do however request clarity on what assessment criteria will be used by Ofgem to decide whether the PCF should be activated. These criteria should be publicly available.

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?

We disagree with the limited recognition given as part of this minded-to decision for the additional administrative burden an approved CMP448 places on NGED. We request clarity from Ofgem on what data needs to be provided, the expected cadence for submissions and justification for each piece of data being requested. Only the minimum information required for its purpose should be gathered.

We will face challenges in accurately assessing whether projects are reducing capacity because of M1. This is not information the customer is obliged to provide, and more is needed to obligate customers to provide this information if their capacity is reduced by request.