
From: [REDACTED]
Sent: 02 November 2025 19:01
To: connections@ofgem.gov.uk
Subject: Zenobe Energy Limited - CMP448 - Ofgem Minded to Consultation Response

Hello,

Please see below Zenobe's non-confidential response.

Questions

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

Given the options presented (Original Proposal, WACM 1, and WACM 2) we agree with Ofgem's minded-to position to approve the Original Proposal.

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?

Zenobe believes the proposed PCF process is overly complex and, given that implementation is subject to the meeting of the threshold criteria, does not represent an effective method of robustly incentivising projects to progress to achieving milestone M1 following acceptance of a Gate 2 connection offer. The Connection Reform process has been a major upheaval for industry and introduced significant uncertainty for developers. To ensure maximum benefit is gained from this process, Ofgem and NESO should ensure that the integrity of the Gate 2 queue is maintained at all times and not only when a prolonged period of project termination / TEC reduction has been experienced. Uncertainty over security requirements is difficult to manage for developers, a permanently active PCF would resolve this. Zenobe continues to support the permanent implementation of the PCF and would further support the implementation of the previously proposed flat rate requirement of £10,000/MW on projects that terminate a Gate 2 agreement prior to achieving milestone M1 directly as opposed to a catch-up mechanism as proposed. In our view, this approach would ensure only projects that are properly funded and actively proceeding would enter into Gate 2 agreements thus securing the NESO objective to have only "real" projects join the Gate 2 queue.

Regards

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Head of Engineering

ZENOBE



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