
From: [REDACTED]
Sent: 03 November 2025 16:57
To: connections@ofgem.gov.uk
Subject: (CUSC) CMP448: Progression Commitment Fee Response

Dear Ofgem Team,

We appreciate the opportunity to respond to the CMP448 consultation. While we recognise and support the intent to improve queue discipline and reduce speculative projects, we have **serious concerns regarding the one-sided nature of the proposed accountability framework.**

Question 1: Do you agree with our minded-to position to approve the Original Proposal of CMP448?

We do not agree with Ofgem's minded-to position to approve the Original Proposal of CMP448 in its current form.

While we support the principle of encouraging committed participation in the queue, we believe the proposal as drafted places an undue financial burden on developers without establishing reciprocal accountability for network operators, or accounting for delays by external parties. The Progression Commitment Fee (PCF) introduces an additional financial layer that may help reduce speculative activity, but it risks penalising legitimate projects that are delayed by issues outside developers' control.

Many developers, especially small and medium-sized enterprises (SMEs), operate under tight cashflow constraints. The proposed PCF — starting at £2,500/MW and capped at £10,000/MW — is likely to intensify these pressures. Expecting projects to commit substantial funds within a short timeframe creates disproportionate risk for smaller developers compared to larger, well-capitalised market players. This imbalance risks entrenching inequality by favouring organisations that can absorb early-stage financial exposure while discouraging credible smaller developers that play a vital role in delivering community-scale renewable generation.

Beyond the additional financial burden the PCF puts on SMEs, the criteria for having met M1 are not explicit enough. We would seek that language clarifying this position is included as part of CMP448. Submission of a planning application should either be confirmed as the act of submitting the application into the planning portal, or have sufficient time to allow for planning validation to be undertaken (with the option to extend if no response is forthcoming from the planning authority, and with a grace period on validation being withheld as this can come down to the preference of the planning authority rather than any real shortcoming of the planning submission itself.

There are also barriers to making a thorough and competent planning submission that are seasonal, and thus cannot be easily accomplished.

We therefore support WACM 1 as a more balanced and pragmatic alternative, featuring a 90 % lower fee and £0/MW for the first twelve months after PCF activation. This approach would maintain queue

discipline while allowing genuine projects to progress without creating unnecessary financial barriers or undermining the quality of a planning submission.

Question 2: Do you have any further remarks, comments, or concerns with our minded-to position or the accompanying Impact Assessment?

Yes — our primary concern relates to the absence of reciprocal accountability for Distribution Network Operators (DNOs) and the inefficiency of applying the PCF within the same short timeline as planning submission milestones. Gate 2 offers will remain subject to detailed assessment such as line and tower surveys, or compound surveys to facilitate expansion of an existing substation compound. We have seen these surveys frequently take months to arrange, and then subsequently require us to chase the results of these studies for a period of months, causing delays in preparing a planning submission as the point of connection is not yet fully confirmed. As such, under the present proposals we consider that developers are likely to face significant delays derived by delays caused by external parties without recourse.

If developers are to be held financially accountable through the PCF to deter wasted planning effort, then DNOs must equally be held to account for their persistent reinforcement and delivery delays, which are frequently the result of internal mismanagement, coordination issues, and resourcing limitations. These delays often undermine otherwise viable and consented projects, resulting in cost overruns, expired planning consents, and wasted investment. Penalising developers under such conditions is inequitable and risks undermining confidence in the connections process.

We urge Ofgem to:

- Introduce clear, measurable performance standards for DNO delivery of reinforcements.
- Hold DNOs financially accountable for delays caused by internal inefficiencies rather than genuine technical or consent-related constraints.
- Ensure that accountability for connection progress is shared proportionally between developers and network operators.

We also highlight practical inefficiencies under the current design. Under the new ENA queue management methodology for embedded generation, developers are allowed only two months after accepting a Gate 2 offer to achieve planning submission (Milestone M1). Requiring payment of the PCF within this same window — only to refund it after achieving M1 — does not represent an efficient or proportionate process for either developers or network companies. A more flexible timeline for the PCF, aligned with genuine project milestones, would improve both fairness and administrative efficiency.

Such adjustments would help maintain diversity and fairness within the UK's renewable development landscape and avoid creating unintended barriers to market participation for smaller, independent developers.

3. Conclusion

Without reciprocal accountability and proportional treatment, CMP448 risks reinforcing an unbalanced system that penalises smaller developers while allowing DNO inefficiencies to persist without consequence.

We respectfully urge Ofgem to adopt a more equitable and proportionate framework by:

- Introducing mutual accountability obligations for DNOs, and
- Provide a 12 month grace period of £0/MW or approving WACM 1 rather than the Original Proposal, to ensure a fair, transparent, and sustainable connection process.

Thank you for considering our response. We strongly encourage Ofgem to reflect these points in the final design and implementation of CMP448.

Mit freundlichen Grüßen / Kind regards,

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Head of Grid Development

UK Development Team
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