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Dear Electricity Connections Team

**Statutory Consultation on Connections Reform Costs related Modifications to Electricity Distribution Licence Special Conditions**

We welcome the opportunity to respond to the above consultation. As an Independent Distribution Network Operator (IDNO), Green GEN supports the objectives of TMO4+ to improve the efficiency, transparency, and strategic alignment of electricity connections. We recognise the importance of ensuring that Distribution Network Operators (DNOs) are appropriately funded to deliver these reforms, particularly where activities are mandated and not currently covered by existing price control allowances.

We agree that a targeted cost recovery mechanism is appropriate for the one-off costs incurred by DNOs in implementing the G2tWQ exercise. This will help ensure timely and effective delivery of reforms without creating undue financial pressure on network operators.

However, while the proposed changes focus on DNOs, IDNOs will also be impacted by effecting these reforms. We would welcome further clarity on how costs incurred by IDNOs will be recovered, particularly in the short-term.

We encourage Ofgem to consider a broader framework for funding future strategic reforms. This could include mechanisms that can accommodate multi-party impacts.

We appreciate the opportunity to contribute to this consultation and remain committed to supporting the successful implementation of connections reform.

Yours sincerely,

Fiona Morrison  
Head of Regulation – Green GEN Cymru