

Electricity Connections Team  
Ofgem  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

14 November 2025

Dear Team

### **Supplemental Ofgem Guidance on the Determination of Disputes: Gate 2 to Whole Queue**

I am writing in response to Ofgem's draft guidance on its determination of disputes relating to outcomes of the Gate 2 to Whole Queue (G2tWQ) exercise, published on 31 October 2025. I note that this text supplements Ofgem's existing guidance on the determination of connection and use-of-system disputes of April 2017, which Ofgem intends to review separately.

EDP Renewables is a global leader in the renewable energy sector and the fourth largest renewables producer worldwide. Our renewable energy portfolio, with a worldwide installed capacity in 2024 of 27.34 GW, spans wind, solar, hydro and storage across Europe, North and South America and the Asia Pacific. In the UK, we are developing a growing portfolio of onshore wind, solar and battery storage from our office in Edinburgh. We are also co-owner of Ocean Winds, the offshore wind developer with a sizeable presence in the UK. Our main shareholder is EDP (formerly *Energias de Portugal*), the global energy company headquartered in Lisbon.

We welcome the clarity set out in this draft supplemental guidance on Ofgem's expectations for and approach to any disputes directed to it arising specifically from the G2tWQ exercise. We also recognise the important role that the Authority holds, including through its ability to decide consequential and unresolved disputes, in the effective management of connections and the use of the system. Having reviewed the draft guidance, we agree that it is sufficiently clear for developers and other relevant stakeholders on the preconditions for raising such a dispute with the Authority, the requirements for a request, the Authority's process for handling such a request and the limitations on potential remedies. In that regard, we take note of the high threshold established by Ofgem for an applicant to raise and to receive its consideration of a dispute relating to an outcome of the G2tWQ exercise. We remain hopeful that such disputes need not arise, on the basis that the outcomes of this important exercise will be fair, reasonable and appropriate, in the context of the limited scope for redress (not least due to the timescales).

On cost recovery, we note that Ofgem is considering whether to revise its standard approach of not seeking to recover its costs associated with its determination of disputes, except for those cases where the actions or omissions of a party to the dispute resulted in Ofgem's incurrence of costs beyond what would normally be expected, for disputes relating to the G2tWQ exercise. In our view, the precedent above on cost recovery for disputes which Ofgem has established is reasonable and proportionate. We believe that this precedent should be maintained, both for disputes arising from the G2tWQ exercise (related to this guidance) and those arising in relation to connections or the use of the system generally (related to the 2017 guidance, to be revised). We consider that it would not be proportionate for applicants which have sought the Authority's consideration of a consequential and unresolved dispute, in good faith and with regard to the preconditions and requirements set by the Authority for such a request, to now be liable for costs associated with the determination of that dispute. We also note that, given the high threshold established, the number of requests should be low, limiting any potential costs.



We would be pleased to offer our perspective on any future revisions to the 2017 guidance and we look forward to engaging further with Ofgem on the subject of connections reform.

Yours sincerely

A handwritten signature in black ink, which appears to read "Anthony Salamone". The signature is fluid and cursive, with a horizontal line drawn underneath it.

**Anthony Salamone FRSA**  
Policy and Regulation Lead Associate  
EDP Renewables UK