

Approach to disputes and determinations from the Gate 2 to Whole Queue exercise

About Field

Field develops, builds, owns and operates the renewable energy infrastructure needed to achieve net zero. Our focus is on battery energy storage systems (BESS) in Great Britain. We currently operate a 110 MW / 180 MWh portfolio across four distribution-connected assets and have a strong pipeline of ready-to-build projects connecting to both the transmission and distribution networks. Our wider development pipeline totals around 4.5 GW of large, transmission-connected assets.

We welcome the opportunity to respond to Ofgem's consultation on the *Approach to Disputes and Determinations from the Gate 2 to Whole Queue Exercise*. As an active participant in the connections reform process, we support Ofgem's work to ensure the new arrangements are fair, transparent and efficiently implemented.

Executive Summary

Field supports Ofgem's intent to provide a structured and proportionate route for dispute resolution under the Gate 2 to Whole Queue (G2tWQ) process. However, to ensure confidence and practical usability, we encourage Ofgem to clarify timelines, costs, and expectations around Alternative Dispute Resolution (ADR) in the final guidance.

We recognise Ofgem's desire to prioritise bilateral resolution, but timely and transparent processes remain essential to maintain trust and efficiency in the connections reform programme.

Consultation Questions

1. Does the G2tWQ Determinations Guidance in Appendix 1 clearly set out the Authority's determination processes for disputes arising from the Gate 2 to Whole Queue exercise and its expectations of disputing parties?

We welcome the additional clarity provided by this draft guidance. The document helpfully confirms that Ofgem's determination role will remain limited and that parties must first exhaust all relevant ADR routes with NESO or the relevant network operator.

However, further practical detail would be valuable — particularly around timelines, costs, and escalation routes — to ensure the process is workable and proportionate for developers.

Reference: DESNZ / Ofgem Open Letter

We note the **joint open letter from DESNZ and Ofgem (11 November 2025)** setting out expectations and ambition for Connections Reform to deliver Clean Power 2030.

Key messages to NESO and network operators include:

- Delivering **quality and ambitious connection offers**;
- Ensuring **timely implementation** of the reformed process; and
- Supporting **on-time delivery** of projects.

This letter underlines the need for accountability and ambition across the Gate 2 process, and informs our wider response below.

Challenging connection date, not gate 1/2 allocation

Few customers are likely to challenge their Gate 2 classification; however, many may wish to challenge the **connection date** provided in their Gate 2 offer. Based on historic experience, connection offers issued by Transmission Owners (TOs) and NESO often appear conservative, with limited transparency over the assumptions behind proposed dates. Developers currently have little ability to hold TOs or NESO to account when justification for those dates is not provided.

To address this, Field suggests that Ofgem consider establishing a **dedicated mailbox or portal** for developers to outline the process they have followed and present evidence supporting an accelerated connection date. Ofgem could then:

- Direct developers to continue engagement with NESO/TOs where appropriate;
- Confirm where it does **not** consider there is sufficient evidence of error; or
- Request NESO/TOs to provide a **comprehensive written explanation** of how dates were derived. Such written explanations could also be used as evidence under the RIIO framework.

Given the resource implications, Field suggests this could operate as a **paid-for service** (for example, ~£20 k per submission), with developers able to submit evidence once per project.

2. Is there any additional clarity that you think is needed on the determinations procedures in the G2tWQ Determinations Guidance?

1. Timelines for Ofgem response

- Please confirm how long Ofgem will take to acknowledge, review and respond to a submitted dispute.
- Clarify whether determinations can be appealed, and if so, the expected duration of any appeal process.

2. Cost implications

- Please provide detail on the methodology or indicative cost structure, to allow developers to assess whether it is reasonable to pursue a dispute.

3. Timing dependencies on ADR completion

- The longer the delay by network/system operators in concluding their ADR processes, the smaller the window — and the practical benefit — of submitting an Ofgem dispute.
- We recommend Ofgem specify target timelines for operators to complete ADRs to avoid situations where developers run out of time to pursue valid cases.

4. Definition of “exhausting ADRs”

- The guidance says parties must “utilise other ADR routes available”. It is unclear whether this means *all* ADR routes must be completed, or whether one recognised ADR pathway is sufficient.
- This wording could allow network/system operators to argue that a customer has *not* met the threshold for “exhaustion”, potentially blocking legitimate disputes.

Recommendation:

- i. provide a definitive definition of the *minimum bar* for “exhausting available ADRs”,
or
- ii. offer a light-touch route for developers to seek Ofgem’s confirmation that they have met this bar *before* submitting a full dispute application.

5. Transparency and procedural certainty

- Publishing the pro-forma in advance and providing example timelines or indicative process maps would significantly help developers prepare consistent, complete submissions.