

Consultation

Connections End-to-end Review – Updated Proposals and Next Steps

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Executive summary

This document is our¹ response to our November 2024 consultation on the connections end to end review of the regulatory framework.²

The end-to-end review is a long-term review of the regulatory framework that governs the electricity grid connections process. The review, which we committed to undertaking in the November 2023 joint Ofgem / Government Connections Action Plan (CAP), aims to implement enduring regulatory reform needed to complement the process changes being introduced through NESO's TMO4+ reforms.³

It has set out to review the complete customer journey from “end to end” and present a package of changes within that journey that we think are needed to drive two key outcomes – greater standards of service, and timelier connections, for generation, storage and demand customers connecting to the grid.

The original consultation marked the beginning of the review process, focusing on building out an evidence base and seeking stakeholder views on a set of initial reform proposals.

The review has been structured into seven themes, each with an identifying problem statement and accompanying goal for desired outcomes at the end of the review process. These themes and associated goals are as follows:

- i. **Visibility and accuracy of connections data** - All useful data must be made available transparently to connecting customers and other interested parties in order to inform customer's connection applications.
- ii. **Improved standards of service across the customer journey** – Connecting customers must receive a high standard of service at all stages of the customer journey, from pre-application to energisation.
- iii. **Network companies being required to meet connection dates in connection agreements** – There should be proportionate requirements on network companies and NESO to meet agreed customer connection dates in connection agreements, commensurate with those on developers to meet project milestones.
- iv. **Quality of connection offers and associated documentation** – Network companies and NESO should be suitably required to issue high-quality offers and associated documents and information to connecting customers

¹ The terms “the Authority”, “we”, “our” and “us” are used interchangeably in this document

² [Connections end-to-end review of the regulatory framework | Ofgem](#)

³ [Decision on Connections Reform Package \(TMO4+\) | Ofgem](#)

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- v. **Ambition of connection offers** - Network companies and NESO should be suitably required to offer connecting customers ambitious connection dates, to ensure they are doing everything possible to expedite connections.
- vi. **Smaller connections** – Smaller connections customers, ie, those seeking to make connections at low voltages (such as domestic and small business customers installing heat pumps or Electric Vehicle charge points), should receive a prompt and consistent high standard of service from network companies.
- vii. **Provisions and guidance for determinations** – There should be greater clarity and transparency for all parties on the determinations process, including on Ofgem’s role in managing complaints and issuing determinations.

The extensive stakeholder feedback received in response to the consultation, coupled with wider ongoing stakeholder engagement, has built up the evidence base and led to the set of decisions and proposals presented here, set out under each theme in the document.

We recognise that network companies and NESO have done a lot of good work in recent years to improve the customer journey in a number of areas for connecting customers, particularly given the challenging circumstances of an ever growing connections queue. The review seeks to strengthen the regulatory framework to build on that good work and realise further improvements.

We are seeking further stakeholder views on the proposals, and on any other areas of the themes that we may have missed, through a set of consultation questions. We expect to provide our next update in summer 2026 detailing next steps, in response to the feedback received.

In the meantime, we will immediately progress the decisions into implementation and undertake statutory consultation for them, as necessary. The document sets out the next steps we expect to take on each of the themes.

Introduction

Background

- 0.1. The Connections End-to-End Review (“the review”) was first announced as part of the joint Ofgem⁴/Department of Energy Security and Net Zero (DESNZ) Connections Action Plan (CAP) in November 2023, in the context of an oversized connections queue of inefficient technology mix, significant connection delays and mixed standards of service being received by connecting customers.⁵ These issues were in turn threatening wider ambitions around clean power / Net Zero, and economic growth.
- 0.2. The CAP was a joint government and Ofgem action plan on accelerating connections to the electricity network in order to address these issues.
- 0.3. In late 2024 government published its Clean Power 2030 Action Plan (CP2030), which set out a pathway to a clean power system by 2030.⁶
- 0.4. It was clear that the decisive reform to the connections process envisaged in the CAP was needed to achieve the ambitions of CP2030, given the scale of connections and associated network build required.
- 0.5. In April 2025 Ofgem published its decision to approve NESO’s proposals for reforms to the connections process, known as TMO4+.⁷ Those reforms will move the connections process away from “first come, first served” to “first ready and needed, first connected”, with projects prioritised in the queue based on their readiness and on their need, ie, whether they align with the requirements of CP2030.
- 0.6. We anticipate that many of the more speculative projects that had previously been 'blockers' in the connections queue will be deprioritised, and the reformed queue will deliver a more realistic build signal to network companies.
- 0.7. The implementation of those reforms is now underway, with qualifying projects expected to receive updated offers shortly.
- 0.8. The end-to-end review was envisioned within the CAP as a comprehensive review of the regulations on network companies and the National Energy System Operator (NESO) that underpin the connections customer journey. The intended outcome of the review was a strengthened regulatory framework for Distribution

⁴ The terms “the Authority”, “we”, “our” and “us” are used interchangeably in this document

⁵ [Electricity networks: connections action plan - GOV.UK](#)

⁶ [Clean Power 2030 Action Plan - GOV.UK](#)

⁷ [Decision on Connections Reform Package \(TMO4+\) | Ofgem](#)

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Network Operators (DNOs), Transmission Owners (TOs) and NESO that delivered both improved quality of service and more timely connection outcomes.

- 0.9. We have always been clear that, to maximise the benefits of the ongoing connections reform, we need the end-to-end review to work in lockstep. The net result will be a strengthened regulatory framework that network companies and NESO must comply with as they operate within the new reformed connections process.
- 0.10. In November 2024, we launched our initial consultation / call for input on the review. That consultation closed in March 2025.
- 0.11. The scope of the review covers all tiers of the regulatory framework, encompassing industry codes, licences, price control frameworks and Guaranteed Standards of Performance (GSOPs). The full context within which the review was established is more comprehensively covered in our original consultation document.
- 0.12. The consultation arranged the content of the review into seven key themes (see list in the executive summary), representing the key areas of the connections customer journey where we feel improvements can be made. These are:
- 1 - Visibility and accuracy of connections data and network capacity
 - 2 - Improved standards of service across the connection customer journey
 - 3 - Requirement on networks to meet connection dates in connection agreements
 - 4 - Quality and reliability of the connection offers and associated documentation / contracts
 - 5 - Ambition of connection offers
 - 6 - Smaller connections, and
 - 7 - Provisions and guidance for determinations
- 0.13. We presented the issues that we recognised within each theme and proposed solutions to address them. We sought views on the issues and proposals identified, as well as whether we had missed anything that stakeholders considered we needed to address.
- 0.14. We received a thorough set of over 100 consultation responses. Analysis of those responses, as well as policy work done in the meantime, has informed the decisions and updated proposals that we are setting out as part of this document.

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- 0.15. The review has been undertaken concurrently with ongoing design work on the connections aspects of both the Electricity Distribution (ED3)⁸ and Electricity Transmission price control frameworks (RIIO-ET3).⁹ This review is closely aligned with these processes, and the outcomes of each stage of each process have informed policy development on the others. We are clear that the end-to-end review must work holistically with the design of the price control frameworks.
- 0.16. Finally, the focus of this review is on the customer journey as facilitated by TOs, DNOs and NESO. The role of Independent Distribution Network Operators (IDNOs) and Independent Connection Providers (ICPs) are not within the immediate scope of this review. We do however recognise the need to review the roles and regulation of third-party service providers that undertake contestable works in the connections process, and are mindful of the impacts that only focussing changes through this review on network companies may have on competition – we will consider this as we move forward with implementing outputs from the review.

Document structure

- 0.17. For each theme we set out the problem statement, goal and key issues identified in the original consultation. We then provide a summary of stakeholder feedback received in response to each question, highlighting the main themes and topics that emerged. We also discuss any additional proposals made by respondents.
- 0.18. We then outline our analysis of the responses received. This includes exploring any risks or trade-offs associated with proposals, identifying ways to mitigate them, and considering how the points raised interact with other themes in the review.
- 0.19. We then present the decisions and proposals that make clear our direction of travel. The proposals are intended for further consultation.
- 0.20. We pose a series of questions within each theme. In particular, we want to hear from stakeholders whether they agree with our decisions and proposals, suggestions for the design of these proposals, and input on next steps in taking them forward. We also pose a general question under each theme to test whether there is anything that has not been covered that stakeholders think should be included.
- 0.21. To conclude each theme, we summarise the next steps we will be taking following this consultation, to implement the decisions and develop the proposals we have outlined.

⁸ [Sector specific methodology consultation: electricity distribution price control \(ED3\) | Ofgem](#)

⁹ See [here](#) for the RIIO-T3 Final Determinations

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- 0.22. We would like to note that, whilst the themes are generally mutually exclusive, there is a significant inter-relationship between Themes 2, 3, 4 and 5 on improving standards of service, meeting connection dates, improving the quality of offers and ensuring offers are suitably ambitious. We recognise that a balanced approach is required in addressing these areas in order to drive the right behaviours and outcomes, and explore this as part of this consultation.
- 0.23. We would also like to highlight that, unlike the other themes in this consultation, Theme 6 (smaller connections) has been specifically defined by voltage, ie, is relevant to connecting customers at lower voltages (typically including connections at the domestic level to small, non-domestic level connections).

Purpose of the consultation

- 0.24. This document represents our response to the initial consultation, and sets the direction of travel for the next phase in two ways:
- We set out decisions where we feel we have the evidence base
 - We set out proposals for consultation and further policy development
- 0.25. Unlike the previous document we are no longer consulting on the RIIO-ET3 connections incentives - that design process is being run separately.

Other publications and related work

- 0.26. As discussed, the review is being undertaken in tandem with the design and development of the ED3 and RIIO-ET3 frameworks, with the intention of ensuring that network companies are appropriately incentivised / required to drive up standards and ensure timely connections are made within the new connections process.
- 0.27. We expect the next price control periods will see a significant increase in, and diversity of, connections being requested - there is therefore clear and obvious overlap with the objectives of the price control frameworks and the end-to-end review.
- 0.28. The ED3 SSMC, published in October 2025, discussed several proposals for how to update the price control framework to better incentivise a timelier connections process with better customer engagement and satisfaction.¹⁰ Many of the proposals will be discussed in greater detail in this review, and the outcomes of this review will help to direct further ED3 design work.

¹⁰ [Sector specific methodology consultation: electricity distribution price control \(ED3\) | Ofgem](#)

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0.29. The RIIO-ET3 Draft Determinations¹¹, published in July 2025, proposed the introduction of a new connections incentive attached to project delivery, specifically the volume of projects that the TO connects by their agreed connection date. That proposal has been developed further in the T3 Final Determinations publication.¹²

0.30. Finally, the ongoing implementation of the reformed connections process continues at pace, with formation of the new queue and revised offers being issued to qualifying projects shortly. As noted, the outcomes of end-to-end review will ensure regulated parties deliver timely connections and a high standard of customer service within that new reformed process.

Consultation stages

- **Stage 1** Consultation open: 8 December 2025.
- **Stage 2** Deadline for responses: 27 February 2026.
- **Stage 3** Responses reviewed and published: spring 2026.
- **Stage 4** Consultation outcome (decision or policy statement): summer 2026.

Next steps

0.31. This consultation will remain open for twelve weeks until the end of Friday 27 February 2026. The feedback we receive will inform policy development and subsequent stages of the end-to-end review.

0.32. We will further engage with stakeholders through a series of engagement and workshops across the various themes.

0.33. We expect to respond to this consultation later in mid-2026.

0.34. In the meantime, we will progress implementing the decisions we have made as part of this document. We set out the specific next steps for each theme at the end of each chapter.

¹¹ [RIIO-3 Draft Determinations for the Electricity Transmission, Gas Distribution and Gas Transmission sectors](#)

¹² See [here](#) for the RIIO-ET3 Final Determinations

Theme 1: Improving visibility and accuracy of connections data

Problem statement

- 1.1. Good quality, standardised, usable network capacity data is not uniformly made readily and transparently available to connecting customers in a manner that is both timely and useful. This prevents customers from identifying optimal grid entry points for their projects.

Goal

- 1.2. Greater alignment and standardisation of how all useful data is made available transparently to connecting customers and other interested parties, including third parties providing connection services. This will help connecting customers to understand network conditions in different locations to inform their decisions on, and improve the quality of, connection applications, and ensure that connecting customers receive connection offers more aligned with expectations.

Summary of issues identified in the consultation

- 1.3. Here we summarise the issues we originally identified and set out in the original consultation. See the original consultation for more detail.
- 1.4. **Data availability:** Pre-application data, including generation and demand-specific data, is not always readily available.
- 1.5. **Network visibility and capability:** Customers have limited ability to self-serve. They need visibility of the wider state of the network and the capability of the grid/grid assets when deciding on a connection application submission.
- 1.6. **Visibility of local grid conditions:** The lack of sight of local grid conditions can affect the quality of connection applications. Network companies are then required to process large volumes of low quality or underdeveloped connection requests.
- 1.7. **Data quality and veracity:** Where data is available, it is not always accurate, of sufficient granularity, nor kept up to date in a timely manner.
- 1.8. **Real-time data:** There is a need for connections data to be made available in real-time.
- 1.9. **Existing data visualisation tools:** Currently, different tools are being used across transmission and distribution. A unified set of open data tools is needed. All tools should have the functionality to present accurate, up-to-date data in real time.

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- 1.10. **Connections queue visibility:** Lack of visibility of details of projects that are ahead in the connections queue, and of how individual network companies operate their Active Network Management (ANM) schemes, limits developers' ability to assess curtailment risk (ie, the risk for generation or demand of being asked to reduce or stop their output or consumption of electricity, usually to maintain grid stability) and model the curtailment that their own proposed projects will be subject to.
- 1.11. **Technical support:** It can be difficult for customers to access technical support from network companies if they have clarification requests or technical queries relating to data.

Stakeholder views

- 1.12. This section summarises the responses we received to each of the questions in the consultation in turn.

Question 1a. The issues

Do you agree with the issues we have set out under Theme 1 – Visibility and accuracy of connections data and network capacity? Are there any other issues under this theme that we should consider or be aware of?

- 1.13. The majority of respondents agreed with the issues we set out under Theme 1. We have set out below the substantive points we received in response arranged by specific issue. Note, some points are applicable to more than one issue, so all points should be considered in the round and not just in relation to the issue under which they are presented.
- 1.14. **Data availability:** With respect to pre-application availability of connections data, there was/were:
- i. several calls for a demand connections register, similar to the Embedded Capacity Register (ECR)¹³ and/or the Transmission Entry Capacity (TEC) register¹⁴ for generation and storage projects, ie, an industry-wide database providing information about demand projects that are connected, or have accepted offers to connect, to the electricity distribution and transmission networks

¹³ Each DNO publishes its own ECR, which lists all connected and contracted Distributed Energy Resources (DER) on the distribution network, such as solar farms and battery storage sites. The register includes information such as the location, technology type and connection status of each DER. It is used by developers and planners to understand existing generation and available capacity at each network point. The ENA provides a central portal from which all ECRs can be accessed.

¹⁴ The TEC register is managed by NESO. It shows all parties with transmission entry capacity agreements and how much capacity generators or interconnectors have secured on the transmission network. It includes the names of specific projects, their transmission entry capacity value (how much capacity in MW they have secured), their connection point and their expected connection date. It helps developers to understand what transmission capacity has already been allocated and what is still available.

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- ii. conflicting views as to whether data availability is better at transmission or distribution level, and concerns that it is currently difficult to get answers to questions relating to the transmission/distribution interface, ie, data relating to the operational boundary where the high-voltage transmission network meets the lower-voltage distribution network, such as the effect on transmission stability, capacity and power flows when a generation project is connected on the distribution network, or the effect on voltage and thermal limits on the distribution network when a large project is connected at transmission level
- iii. calls for more granular data down to substation level
- iv. concerns that requirement for, and impact of, transmission reinforcement is often not known at initial connection offer stage
- v. calls for data to be freely available without the need for registration
- vi. desire for a robust framework for data access for prospective connecting customers, with uniform data-sharing protocols across all network companies

1.15. Network visibility and capability: Issues and suggestions included:

- i. there is a lack of sufficient detail as to how networks are operated, eg, the status (open or closed) of switches and circuit breakers that control how circuits are interconnected, which may be open intentionally, for example, during maintenance or when there is a fault
- ii. future energy capacity forecasts, information on the effect of government and local policy, and information on consumer technology preference would help businesses plan investments and ensure that grid infrastructure is keeping pace with required demand, eg, there is lack of clarity on Distribution Future Energy Scenarios (DFES), including how Local Area Energy Plans feed into DFES outputs
- iii. to enable prospective connecting customers to better understand how much their project is likely to cost, a file of typical benchmarked average costs would be useful, such as connection charges, reinforcement costs, and charges for engineering studies, design work and project management
- iv. there is a need for data on capacity and constraints for Low Voltage networks

1.16. Visibility of local grid conditions: Respondents mentioned additional data they would like to see, including:

- i. upstream reinforcement works, in order to understand acceleration potential and timeline interdependencies for connections
- ii. status of substation constraints and planned reinforcement works presented on online network mapping tools should match up with information in quotations and offers
- iii. capacity available at each substation, and if there is a substation in a different jurisdiction from the customers' development site with preferable proximity, eg, a substation that is physically closer to where the connecting customer wants to site their project

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- iv. details of other local energy generation or storage assets, in order to avoid oversupply in one region and undersupply in another
- v. level of hardware redundancy required at a connection point in MW to enable customers to accurately calculate headroom, as redundancy directly affects how much real capacity is available for new connections, ie, connecting customers want to know how much extra capacity is built into the connection point through extra equipment such as transformers or circuits, so that they can accurately calculate how much unused capacity there is left for new projects
- vi. details of physical restrictions at a substation (such as insufficient space or a layout that makes it difficult to add new equipment) or non-extensive switchgear (electrical gear, such as circuit breakers and switches, that cannot easily handle extra connections or upgrades), as these will add significant extra costs to a project, because making changes or adding capacity will require major work

1.17. **Data veracity:** The accuracy and completeness of data was a key issue for respondents. Responses highlighted that:

- i. ECRs are often inaccurate, incomplete and out of date, despite an existing code obligation requiring these be maintained¹⁵
- ii. Long Term Development Statements (LTDS)¹⁶ and TEC registers are often outdated, inconsistent and inaccurate, eg, inaccuracies noted in project status, planning status and technology type fields
- iii. priority should be the availability of accurate data, with sufficient time ahead of application windows, so that projects can optimise their connection requests
- iv. a one-off full data cleansing exercise is needed for all registers, data books and data visualisation tools, followed by regular data correction and cleansing activities ahead of each connection application window
- v. network companies should make it easy for customers to correct any errors, eg, via a portal or helpline

1.18. **Data granularity:** Responses indicated a strong consensus for greater granularity of grid data, including:

- i. capacity available to connect at substation level, including non-firm capacity (capacity that is not guaranteed when the network is under stress due to high demand or an outage)

¹⁵ Distribution Connection and Use of System Agreement (DCUSA) obligation DCP350 mandates each DNO and IDNO to publish an ECR listing all connected or accepted-to-connect sites that have import/export capacity \geq 1MW, or are subject to a Demand Side Response contract, and/or are export-capacity only \geq 1MW. [DCUSA Document - DCUSA](#).

Standard licence condition 22 of the Electricity Distribution Licence requires licensees comply with all DCUSA obligations. [Electricity Distribution Consolidated Standard Licence Conditions](#)

¹⁶ LTDS is a regulatory requirement for network companies to publish information about their networks, such as capacity, constraints and future development plans, so that customers can make informed decisions about their connections and investments.

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- ii. details of planned future reinforcement works, ie, upgrades to the network to make it capable of handling more demand or generation projects, such as adding new transformers or cables, or upgrading substations
- iii. heat maps, ie, visual maps that show where there is spare capacity and any constraints on the electricity network
- iv. network harmonic data (information on distortions in the voltage or current wave); if a project will add too many harmonics/distortions to the network, special filters may need to be added to keep power quality within safe limits
- v. Connection Readiness Indicator, ie, a measure of a home's readiness to connect Low Carbon Technologies (LCTs) [see Theme 6 for more detail on smaller connections]
- vi. many calls for Geographic Information System (GIS) data, eg, to enable project managers to understand the cost of running cable from different locations
- vii. details of the available load in the network for each voltage level, ie, how much extra capacity the electricity network can handle without upgrades at Low Voltage (LV), High Voltage (HV) and Extra High Voltage (EHV); this information helps customers know where they can connect and at what scale without incurring the additional cost of network reinforcement works
- viii. HV feeder data, eg, data on the cables and overhead lines that carry electricity from the substation to the customer's project, such as how much power they can carry, how much power is already being used, voltage level, and details of any faults; currently some DNOs do not provide this as they consider it could reveal individual load profiles and risk the security of sensitive customers who might be identifiable from their load profiles¹⁷

1.19. Respondents were keen to see data brought up to date and then updated on a regular basis. There was agreement that the issue of out-of-date data is particularly acute for heat, capacity and constraint maps, with some heat maps being 6 months old, as well as for ECR, LTDS and TEC registers. It was suggested that network companies have had insufficient resources historically to keep data up to date, but that they should have less difficulty in this regard now that the connections process is structured into periodic application windows.

1.20. **Real-time data:** Responses indicated an appetite for a move to real-time data to be made available to users; however, the difficulties of providing real-time data at a granular level were acknowledged. For example:

- i. **Data volume and complexity:** The network has thousands of assets, so monitoring all of them in real time would generate an extremely high volume of complex data. Storing, processing and presenting this data in a usable format is costly and requires significant resources and technical expertise.

¹⁷ A load profile is a dataset showing the change in electricity demand for a customer over time, including peaks, lows and seasonal variations.

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- ii. Sensor and infrastructure limitations: The network is not currently set up with sufficient sensors and smart monitoring equipment to provide data for all jurisdictions in real time. Upgrades would be required, which are expensive and take time to implement.
- iii. Cybersecurity risks: Making network data openly available in real time at a granular level increases the network's vulnerability to cyber-attacks, which may harm critical infrastructure, such as hospitals, airports, electricity generation plants, water treatment plants or military bases.
- iv. Commercial sensitivity: Certain information, if shared openly and in real time, could adversely impact the business decisions taken by an energy developer and/or their contract negotiations.
- v. Confidential customer information: Releasing real-time data could inadvertently reveal confidential customer information, eg, a large decrease in headroom in a particular location could indicate that a large project will be connecting there soon, and this might be sufficient information for someone with local knowledge to identify the project and its owner.

1.21. Existing data visualisation tools: Respondents were in agreement that these tools have the potential to improve self-serve for connections design and optioneering, but, at present, there is too much inconsistency with respect to data quality. NESO Connection 360 tool and the use of the Common Information Model (CIM)¹⁸ to standardise network asset data were identified as working well. Suggestions for improvement included:

- i. creating a single digital view tool/portal across transmission and distribution, funded by the network companies but centrally administered by the Energy Networks Association (ENA) or NESO, so as to reduce the resource and regulatory burden on DNOs [we discuss this in more detail under Question 1b below]; however, other respondents felt that resources should be focussed on improving existing tools rather than creating a new one
- ii. tools should show accurate, real-time connections data
- iii. tools could be used to standardise the application process for connections
- iv. tools should have functionality to allow users to report inaccurate or missing information, eg, errors on plans, or the presence of shallow cables
- v. network companies should be mindful of any efficiencies that could be achieved from alignment of their programmes to improve digital tools with the Data Sharing Infrastructure (DSI) programme [we discuss use of the DSI for data sharing in our response later in this document]
- vi. Ofgem should consider the long-term maintenance costs of tools and ensure proportional regulatory support, eg, funding through the price controls

¹⁸ CIM is an international standard (IEC 61970/61968) for representing power system components and their relationships in a consistent, machine-readable way. By using CIM, different systems can exchange data without custom integrations.

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1.22. **Connections queue visibility:** Respondents made a number of suggestions with respect to connection queue visibility, including:

- i. include high-level information for all projects in the connections queue, ie, developer, technology type, capacity at substation level
- ii. amend legislation/regulations to allow full publication of queues, including milestone data and relative queue position
- iii. open accountability and assessment against CP2030 targets, ie, the process for deciding which projects are selected as needed to achieve CP2030 and data relating to those projects (eg, developer, technology type) should be transparent and publicly available so that stakeholders can see how decisions are made, assess whether these decisions are fair and consistent, and identify where challenges or delays to achieving CP2030 targets exist
- iv. advanced notice should be given if attrition from the connections queue may result in earlier connection dates available at certain sites, as pre-connection investment and construction takes years to instigate
- v. data on approved applications would help local authorities make better routing decisions for utilities and minimise street work disruption
- vi. more transparency is needed in relation to which projects are triggering wider system upgrades
- vii. network companies should consider using Smart Electronics (devices that have built-in intelligence to monitor, report and communicate data) to reduce the need for manual data entry and chance of error

1.23. **Technical Support:** Issues highlighted included:

- i. poor communication from the network company can lead to misalignment between the connection offer and the project request, so there is a need for a robust pre-application service to speak to a local planner or engineer, and to engage directly with suitably qualified personnel at network companies, as better understanding of engineering and feasibility issues at connection points makes applications more robust
- ii. concerns that regional webinars/connection surgeries do not provide sufficiently detailed or reliable answers to questions
- iii. data configuration can be technically complex and should be simplified wherever possible to make it accessible to non-specialists, eg, those interested in the data in the context of their work on broader decarbonisation issues

1.24. **Additional issues mentioned by respondents:** A number of responses referred to issues relating to data consistency, these included:

- i. the specific data types made available often vary between DNOs due to differences in data triage assessment for data protection impacts
- ii. inconsistencies across transmission and distribution (eg, different terminology) cause difficulties when combining datasets for analysis

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- iii. calls for Ofgem to set clear standards for network companies to implement a standardised, streamlined and fully digitalised customer journey
- iv. consistent formatting of data nationally would support non-technical stakeholders

1.25. Several respondents referred to curtailment risks, these included:

- 3.1. constraint maps often show 100% curtailment at many Grid Supply Points (GSPs), suggesting that the data feeding into the maps is either inaccurate or out of date
- 3.2. high-demand sectors (eg, data centres, Electrical Vehicle (EV) charging infrastructure) should be proactively notified of curtailment risks, so that they can shift their workloads or charging schedules in response to grid needs

Disagreement with the issues identified

1.26. Some respondents, mainly network companies, disagreed with the issues we set out under Theme 1. Reasons are provided below.

1.27. Network companies are already subject to requirements around data quality and have demonstrated significant improvements. Many of the issues highlighted by Ofgem in the consultation are already being addressed in the ENA Strategic Connections Group (SCG) Data Sub-Group. Data is already becoming more accessible, transparent and interoperable. For example:

- i. positive steps have been taken to bring about improvements through the introduction of NESO's Connection 360 tool
- ii. DNOs are working with the DESNZ to balance the obligations of Ofgem's Data Best Practice Guidance¹⁹ with cyber security and data protection considerations
- iii. data portals and websites are accessible via the ENA's Connections Data webpage, including geospatial capacity maps, electric vehicle capacity maps and embedded capacity registers
- iv. standardised data collation and reporting is happening through monthly ENA submissions
- v. Statements of Obligations (SOO) are formal directives from Ofgem or government requiring that network companies undertake specific duties or adhere to certain service standards, eg, under the RIIO-2 licence framework, DNOs are complying with special condition 9.13 to create a Smart Visualisation Interface (SVI), which will include heat maps and the ability for authorised users to retrieve current and historic connections data via a common Application Programming Interface (API)

¹⁹ [Data Best Practice Guidance](#) – Ofgem has begun consulting on expanding the obligation to follow Data Best Practice Guidance to selected code parties: [Data Best Practice as a Code Obligation](#)

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- vi. all DNOs and NESO have delivered digital views of the connections queue in 2024
- vii. in accordance with the LTDS licence condition²⁰, which requires transparency and accessibility of network data, DNOs are actively developing CIMs to standardise and streamline data integration
- viii. several DNOs use the same vendor for asset visualisation and mapping functionality of their open data portals, so their portals are already consistent to an extent
- ix. network capacity headroom reports, which provide a description of the parts of the system most suitable for new connections, are now being provided in a common format for all DNOs and are part of the mandatory Network Development Plan²¹

1.28. There have been significant changes to the connections process since Ofgem's end-to-end insight gathering was conducted, which was based on the pre-reform process. Considering the significant reforms which are in train, many of the concerns raised in the consultation will be addressed or negated in time without the need for regulatory intervention.

1.29. One size does not fit all. For example, not all customers have the resources and expertise to fully utilise all available data to assess their options, and many prefer to be guided by experienced staff and engineers. Many network companies offer pre-application connection surgeries to help customers understand costs and timescales.

1.30. There is little value in network companies dedicating significant resource to providing more information whilst the entire network is constrained and requires significant reinforcement. The only way for a connecting customer to obtain realistic and meaningful information on requirements and timescales to provide a connection will be to enter the reformed Gate 2 queue and be allocated a firm connection date.

²⁰ Standard licence condition 25 of the Electricity Distribution Licence (linked above) requires DNOs regularly publish an LTDS. This was updated in 2024 to require delivery of grid model data using CIMs.

²¹ Standard licence condition 25B of the Electricity Distribution Licence (linked above) is a licence condition requiring DNOs to publish a Network Development Plan every two years, covering the next 5-10 years of network capacity, constraints and investment needs. It includes methodology and assumptions, network capacity headroom reports, and network development strategy and planned interventions.

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Question 1b. Data visualisation tools

Do you agree with Proposal 1a (new regulatory requirement on single digital view tools)? Do you have any views on how this should be implemented?

Proposal 1a: A new regulatory requirement on DNOs, TOs and NESO to create, maintain and continuously improve single digital view tools to provide accurate, usable connections data to interested parties.

1.31. Respondents interpreted this proposal in two different ways, with some providing their view on a requirement for improvement of the existing digital view tools and others on creation of a single digital view tool for transmission and distribution.

1.32. **Views on requirement for improvement of the existing digital view tools:** The consensus amongst respondents was that the existing digital view tools are very inconsistent in terms of their approach to visibility and granularity of data. For example, some network companies were praised for providing access to digital geospatial network plans showing all of their assets and infrastructure, eg, substations, cables and overhead lines at LV, HV and EHV; whereas other network companies were criticised for either providing plans with insufficient detail, or providing sufficiently-detailed plans but only allowing access to registered ICPs. There is strong support for more consistency between tools, though respondents were keen to highlight that enforcing consistency has potential risks, including:

- i. the danger of defaulting to the lowest common denominator that tools are required to meet, and the risk of entrenching inefficiencies and limiting potential for continuous improvement
- ii. requests for increased data granularity and frequency of updates could lead to considerable complexity making the tools less user-friendly
- iii. regulation limits flexibility and stifles innovation; industry innovation should be encouraged by allowing competition in digital service provision rather than enforcing a single solution, allowing the industry to develop the most effective tools organically, driven by user needs rather than regulatory prescription
- iv. software product innovation is not a core competency of network companies; whereas an ecosystem of specialised providers can develop dynamic, data-driven tools that evolve alongside the energy landscape, offering more sophisticated and useful insights than a one-size-fits-all central platform

1.33. **Views on creation of a single digital view tool for transmission and distribution:** Respondents highlighted advantages to data being presented in one single digital tool covering the different networks, including:

- i. energy developers need to look at the energy system in a holistic manner
- ii. this results in better investment decisions, better-informed applications, and a reduction in speculative applications
- iii. this supports the shift toward more centralised strategic planning and the rapid drive to deliver decarbonisation

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- iv. this provides clearer insights into the interface between transmission and distribution

1.34. Disadvantages and concerns were also highlighted, including:

- i. blending of all datasets in one tool will make it more difficult to assess the risk of some datasets being poor quality
- ii. there is no need for this if it is possible to navigate to all individual tools easily from a single page
- iii. a cost-benefit analysis of developing a single tool should be undertaken, as development of this tool will require significant investment and resource, the costs for which would need to be passed to connecting customers or recovered from the network companies through the price controls
- iv. whilst TMO4+ and CP2030 changes are progressing across the connections landscape, it is unknown whether a digital platform designed or delivered today would be fit for purpose in the long term
- v. stakeholders have diverse needs, so this might only be beneficial to a small subset of customers, eg, it would be of use to connecting customers who need visibility of capacity, constraints and connection timelines across multiple voltages (large generation and storage developers whose projects span transmission and distribution boundaries, or local authorities for regional energy planning), but less useful for developers of small-scale or domestic projects
- vi. separate tools are needed for transmission and distribution due to different terminologies in use

1.35. Though some responses did mention that industry has been calling for a single digital view tool for several years, the majority opinion was clear that it is acceptable for this to be a long-term aim and that the priority in the short term should be improving the existing tools and the quality of the data within them. Many respondents recommended a staggered approach to implementation of a single digital view tool. Comments supporting this approach included:

- i. a staggered approach would provide incremental functionality improvements sooner, so as not to hold back any benefits that can be delivered in the short term, eg, in the short term it is possible to improve quality by expanding datasets for critical items and move towards consistency in data granularity and structure
- ii. a single digital view should be the long-term ambition; multiple portals are acceptable in the short term, as long as each network company provides a single port of call for access to their data and network companies work together to ensure system interoperability
- iii. the single digital view need not be a completely new tool; it could be facilitated through a common API with the option of layering commercial data solutions on top

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- iv. pause the single digital view proposal until after the implementation of Connections Reform and CP2030 due to the unprecedented changes currently being implemented

1.36. Respondents also took this opportunity to provide detail as to the functionality they would like to see in a single view digital tool. Examples from this wish-list include:

- i. a fully integrated system, not signposting to individual network operator sites
- ii. maps and schematics standardised and interlinked to provide a seamless view of network information across network area boundaries
- iii. like an interactive map, the tool should have a selection function, ie, the functionality to click on a specific item, such as substation or a region, to highlight it and obtain more details, and a zoom function, ie, the ability to zoom in to look closely at a specific area or to zoom out to view the entire network
- iv. the tool should provide functionality for the connecting customer to view the network in its current form, to visualise what it will look like in the future, and to explore possible future scenarios to understand potential impacts on their proposed project, eg, how high EV uptake or a significant increase in renewable generation might affect the available headroom at their project's connection point; to do this the visualisation tool should make use of information in, for example, DFES (for projections of demand growth, and EV and heat pump uptake) Network Development Plans (NDPs) (for planned reinforcements and upgrades), and the connection queue (for approved and pending connection applications)
- v. Demand data should be included in the tool, at both transmission and distribution level
- vi. it should be possible for the user to see the source of each dataset
- vii. cross-sectoral considerations should be included, eg, integrate data gathered from local authorities, transport, telecommunications, gas, water and road sectors
- viii. users need to be able to download data in automated formats (eg, GIS/mapped) for use in their own portals for analysis and layering against their own datasets
- ix. the single digital view should be a live system with real-time updates

Question 1c. Guidance and standards

Do you agree with Proposal 1b (new regulatory requirement on the creation of guidance/standards for data visualisation tools? Do you have any views on how this should be implemented?

Proposal 1b: A new regulatory requirement on DNOs, TOs and NESO to create and maintain guidance / minimum set of standards for connections data visualisation tools.

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- 1.37. The consensus on this proposal was that a new requirement creating minimum standards for data visualisation tools is needed to ensure consistency in data quality. Minimum standards were generally preferred to guidance, with urgency for improvement in this area justifying the need for a robust requirement in the form of a new licence condition or code modification.
- 1.38. However, respondents were also clear that there are already obligations and guidance for network operators to adhere to with respect to data standards, and that any new requirement must be created with care so as to avoid unnecessary or duplicative regulatory burden.
- 1.39. Comments in favour of a minimum set of standards included:
- i. minimum standards are vital, critical and urgently needed to ensure consistency in data quality
 - ii. greater commonality results in familiarity amongst users, making it easier to navigate and interrogate data across network companies, which is especially important for parties developing projects across multiple regions and across both networks
 - iii. minimum standards align with the long-term goal of a single digital view tool
- 1.40. Respondents also asked Ofgem to consider the following, if putting in place minimum standards:
- i. there will be a timing lag before new definitions or standards can be realised, eg, if new data is required, this may only be available for new projects or when monitoring equipment can be installed
 - ii. data and information sharing processes should align with the connections process post reform
 - iii. Ofgem should be cautious of being overly prescriptive on the exact fields, formats and structure of data provided, instead this should be driven by customer need
 - iv. compliance with any new regulatory requirement will need to be monitored
 - v. there is merit in exploring a wider review of requirements to rationalise the publications and make things simpler for customers and stakeholders, as well as to avoid any perverse outcomes of new requirements
 - vi. there should be a cost-benefit analysis of any new requirements factoring in value for customers versus development time for networks and NESO to design, build, test and deliver the solutions
- 1.41. Several responses supportive of a requirement gave examples of what they would like the minimum standards to include. For example:
- i. standardisation of map scales, symbols, data schematisation, language and terminology used in the tools

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- ii. alignment between networks of data triage processes, with all data that is in the interests of customers published in a timely manner unless there is a specific confidentiality or security concern
 - iii. include incentives and penalties to ensure tools are kept current, accurate and complete, especially ECR and TEC registers
 - iv. include a regulatory requirement for interoperability of data visualisation tools, ensuring that all developed platforms have embedded functionality which allows for cross-platform and organisational data sharing
 - v. align the regulatory framework with the Energy Data Taskforce²² principles to ensure that data is presumed open, published at the lowest reasonable level of granularity to maximise its usefulness for planning, machine-readable, standardised, accessible via APIs, in a consistent format so that different systems can exchange and interpret data easily, and accompanied by clear metadata
 - vi. require network companies to update their data more frequently (more often than every six months)
 - vii. a process is required for challenging and cleansing data
- 1.42. Some respondents, mainly network companies, disagreed with the proposal, either because they are of the view that existing obligations and guidance are sufficient, or because they have confidence that ongoing collaboration between industry, the ENA's SCG Data Sub-Group and NESO is already producing positive results without the need for additional regulatory intervention.

Question 1d. Compiled system-level data**Do you agree with Proposal 1c (new regulatory requirement to provide connections data)? Do you have any views on how this should be implemented?**

Proposal 1c: A new regulatory requirement on DNOs, TOs and NESO to provide compiled system-level connections data on a regular basis for external publication.

- 1.43. System-level connections data includes, but is not limited to, data on the number of applications received, offers issued to connecting customers, offers accepted and connections made. This data is split by technology type. Since late 2023, network companies and NESO have collated and submitted system-level connections data to the ENA, Ofgem and wider government on a monthly basis using an agreed template, on a best endeavours basis given the absence of a regulatory requirement requiring them to do so. The ENA compile all of the individual submissions to create the joint transmission and distribution data book, which is published in summary form on a monthly basis on the ENA website.

²² [Energy Data Taskforce - GOV.UK](https://www.gov.uk/government/consultations/energy-data-taskforce)

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1.44. In the consultation, we explained that there is currently no regulatory requirement on network companies and NESO to provide this system-level data to the ENA. We asked stakeholders whether they agreed with our proposal to introduce a regulatory requirement for provision of this data on a regular basis. The majority of respondents agreed with this proposal. Reasons for agreement mentioned the importance of making compiled system-level connections data easily accessible to:

- i. support the quality of connection applications
- ii. enable industry to undertake its own assessments and analysis
- iii. ensure that Ofgem and wider government have the data they need to accurately track and assess the implementation success of connections reform
- iv. support an informed debate about the optimum path to Net Zero

1.45. Specific suggestions and considerations for implementation of this proposal included:

- i. set a minimum frequency for updates: some responses advocated for alignment with bi-annual TMO4+ application windows, whereas others expressed a preference for more frequent updates or live data (linked directly to network company systems, with any updates or amendments immediately flowing through)
- ii. as the data book template has already been agreed, a licence condition placing a requirement on this submission should now be introduced
- iii. create guidance to ensure standardisation of output and minimum level of connections data provided
- iv. make the data open source so that companies can manipulate it in ways they find useful, thereby reducing the burden on ENA and network companies of dealing with requests from industry to change how they manipulate or present the data
- v. following the introduction of any new requirement, adequate time needs to be allowed for changes to systems and reporting to facilitate compliance
- vi. network companies will need to commit additional resources to manage data well and ensure it is of high enough quality for publication
- vii. publication will need to balance openness with commercial sensitivities

1.46. Those who disagreed with this proposal, mainly network companies, did so for the following reasons:

- i. network companies already comply with Ofgem's Data Best Practice Guidance, assuming energy network data is open and shared unless there are justifiable reasons such as personal information, commercial sensitivity, or security
- ii. network companies already have a licence requirement to provide Ofgem with data when it is requested

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- iii. formalising the reporting requirements would reduce flexibility in an evolving landscape
- iv. focus would be better placed on improving coordination and leadership; there were conflicting views regarding which organisation, the ENA or NESO, is better placed to play a leading role in setting and managing standards of data provision

1.47. Respondents also took this opportunity to provide feedback as to the data they would like to see published. There was some overlap here with respect to the data that respondents would like to see published as compiled system-level data and that which they want to be able to access via the data visualisation tools. This wish-list included:

- i. data should be categorised and presented based on the specific generation or storage technologies involved, eg, onshore wind, battery storage
- ii. single line diagrams with all contracted connections
- iii. data relating to the size of the queue, with a strong preference for the queue to be published in its entirety
- iv. available capacity by region and connection type
- v. average connection time and costs
- vi. data on LCTs [see Theme 6 for more detail on smaller connections]
- vii. Demand data, eg, connection type (new demand connection, upgrade, or temporary connection), customer category (domestic, industrial, commercial or public sector), and requested capacity

Question 1e. Completeness and discoverability of connections data

What are your views on the completeness and discoverability of connections data that would be useful to you? Are the existing resources clear and transparent?

1.48. In answer to this question, respondents focussed less on whether they can find and navigate to the resources they need easily, and more on the content of the resources, their clarity and completeness. Responses mentioned that data is often incomplete, that it is difficult to find and access data, and that guidance is currently unclear and difficult to follow. There was strong agreement that data should be open and available to all customers subject to certain sensitivities, such as commercial and security. Specific examples included:

- i. the TEC register should be improved rather than replaced, eg, the Transmission Works Report (TWR)²³ often does not correspond to the TEC register, gaps in data and out of date information make both of these resources unreliable
- ii. the TWR should be improved to show reinforcement works required for each scheme and the anticipated date for the reinforcement works

²³ The TWR is a NESO publication that lists all current and planned transmission reinforcement schemes being undertaken by TOs to facilitate customer connections.

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- iii. the Transmission Owner Reinforcement Instruction (TORI)²⁴ quarterly update is not issued by all network companies; when issued, these updates are often outdated and inaccurate, or only show enabling works (preparatory activities that enable the main transmission reinforcement to happen smoothly, such as site preparation, environmental and civil works)
- iv. data and forecasts on congestion levels would be useful, eg, high-quality, next-day congestion forecasts to support efficient management of the energy system by generators, battery storage operators and demand-side responders
- v. building a picture of capacity is currently too cumbersome a process, as it requires a top-down approach from transmission to the lower voltages, which involves consulting multiple data sources
- vi. LV visibility is important for domestic decarbonisation [see Theme 6 for more details]
- vii. existing heat maps are of limited use, due to data not being updated and lack of coordination between transmission and distribution; data should be updated in the heat maps at regular intervals in synchronisation with a tranche of Gate 2 offers being accepted
- viii. ECRs contain a lot of inaccuracies and missing data
- ix. current tools may be inaccessible to non-specialist users, particularly for community-led energy projects; co-designing workshops with local authorities, strategic authorities and community stakeholders would better address gaps in specialist knowledge

Question 1f. Legal barriers to data publication

Is there additional connections data that would be of use, but legal barriers prevent it from being published? If so, do you consider that there are solutions that would enable this data to be made available, for example, by aggregating it to appropriate levels/anonymising it, etc.

1.49. Respondents identified the following barriers currently preventing publication of useful connections data.

1.50. **Commercial sensitivities:** information on transmission reinforcement works, and costs and securities, if made public, could impact commercial negotiations and put project developers at a disadvantage

1.51. **Security:** the need to protect cyber and physical security of critical infrastructure assets and system data that may identify individual customers, eg, detail on

²⁴ The TORI quarterly update is a report detailing ongoing an upcoming transmission reinforcement projects driven by new large-scale generation (eg, wind farms, solar farms, interconnectors) and major demand connections (eg, industrial loads or EV charging hubs). Each entry in the report typically includes the project name and description (eg, overhead line upgrade, substation expansion), scope of work, and a project update for the last quarter.

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underground cables identifies pinch points, and detail on land and underground assets identifies locations of sensitive buildings, such as hospitals, government offices, police stations and prisons

1.52. **Confidentiality:** compliance with the Data Protection Act 2018²⁵ and section 105 of the Utilities Act 2000²⁶ currently prevents sharing of certain data; in remote areas, anonymising data may not be sufficient to protect the identity of major customers at a particular GSP

1.53. There was widespread agreement amongst respondents that the main issue with respect to the publication of sensitive data is inconsistency of network company data triage processes, ie, there is currently no consistent approach taken to determine which data is considered sensitive/confidential and which is not and can, therefore, be published openly. Respondents proposed the following solutions.

1.54. **Offer different levels of access.** For example:

- i. all non-sensitive data should be published openly, and sensitive data should be published on a secure portal only accessible to registered and approved users
- ii. if all data is published behind a screened log-in (both sensitive and non-sensitive), this will allow network operators to control the data and monitor its usage
- iii. network companies should explore sharing sensitive data for connecting customers with project interdependencies by using bilateral data sharing agreements or non-disclosure agreements

1.55. **Anonymisation, aggregation and redaction of data.** Respondents were divided as to whether these techniques for reducing data sensitivity are sufficient and helpful.

1.56. **Remove legal barriers.** For example:

- i. embed a regulatory principle that all data that can be shared should be shared
- ii. set up a working group to look at consistency of data sharing and triage processes
- iii. make changes to connection contract terms, so that connecting customers waive their anonymity rights when they accept a connection offer, ie, they waive their rights under section 105 of the Utilities Act 2000, which prevents the disclosure of information that concerns individuals or specific businesses

²⁵ [Data protection: The UK's data protection legislation - GOV.UK](#)

²⁶ [Utilities Act 2000](#)

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**Question 1g. Additional comments****Is there anything else regarding Theme 1 – Visibility and accuracy of connections data and network capacity that you consider we have missed?**

- 1.57. Respondents commented on the lack of visibility of ANM schemes. These are the control systems used by network companies to manage real-time power flows on constrained parts of the grid. They allow more generation or demand to connect without reinforcement works by actively monitoring and controlling network conditions. If the network approaches its limits, ANM can automatically reduce output from generators that have a non-firm connection. Respondents suggested that the terms of connection under an ANM scheme should be part of the functional specification of a project and contractual in nature.
- 1.58. Responses mentioned a need for more information on capacity and flexibility markets, use of system charges (the charges paid to use the transmission or distribution network), flexibility services (eg, flexible/non-firm connections to the grid, battery storage dispatch), ancillary services (eg, voltage control, restoring power after a blackout), and energy lost as heat in wires and transformers during transmission and distribution. This information all relates to economic and operational aspects of connecting to and using the electricity network, suggesting that respondents want a more holistic view of cost drivers and market opportunities, and more insight into network efficiency and system planning.
- 1.59. Respondents emphasised the need for an urgent review of forecasted fault levels and their implications for switchgear upgrades and replacements. As more generation connects, the maximum current that can flow during a fault on the network (the fault level) can rise. High fault levels can exceed the design rating of existing switchgear, such as circuit breakers and isolators. Respondents were concerned that the associated costs and safety implications of this issue have the potential to derail CP2030 and increase costs to energy consumers. Useful data here would be, for example, current fault levels at each substation, details of where fault levels are close to exceeding equipment limits (eg, exceeding switchgear ratings), projected fault levels for future years under different scenarios, and any planned mitigation measures.

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**Our response****Summary of key concerns/asks**

- 1.60. Current data being provided is inconsistent, outdated, and varies across network companies and between transmission and distribution
- 1.61. Calls for enforceable regulatory obligations on data quality, update frequency, and completeness
- 1.62. Strong support for a unified, user-friendly portal in the long term, and interoperable tools with common standards in the short term
- 1.63. Demand for more granular data (eg, substation-level, queue positions, curtailment estimates)
- 1.64. Legal barriers (eg, section 105 of the Utilities Act 2000, Data Protection Act 2018) noted, with a number of solutions proposed for the handling of sensitive data

Data consistency

- 1.65. Consultation responses made clear that resolving inconsistencies with respect to the standards of data provision is the most pressing need. Whether the topic is data visualisation tools, compiled system-level data or data triage processes, the common denominator is that there is too great a variance in approaches between network companies and between transmission and distribution, and that this inconsistency leads to suboptimal outcomes with respect to the quality of connection applications, ability of connecting customers to self-serve and ease of use of the data provided.
- 1.66. However, we also understand concerns raised regarding the imposition of overly prescriptive rules and guidance, and we acknowledge that standardisation comes with certain risks, not least being the potential to stifle innovation and reduce flexibility. It is imperative that we encourage fresh ideas, new solutions and continuous improvement in what we know is an ever-evolving environment.
- 1.67. Ofgem is keen to strike the right balance between setting clear, enforceable and future-proofed minimum standards to improve the connecting customer journey and allowing industry a leading role in deciding what constitutes best practice. Therefore, our focus in the decisions we have made and in our new/updated proposals is to set minimum standards with respect to data quality, whilst leaving the onus upon industry, with the guidance of NESO and the ENA, to lead on standardisation of the specific categories of data that should be provided by all network companies and how this data should be triaged for publication and use within the data visualisation tools.

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Data quality

- 1.68. With respect to data quality, there are two key concerns: (1) data veracity (its accuracy and completeness) and (2) how up to date the data is.
- 1.69. We want to first acknowledge that a lot of good work has been done in this space by network companies, the ENA and NESO on provision of quality data. However, we are aware that some network companies may be falling short as regards their data quality relative to what is expected by connecting customers. As there was majority support amongst respondents for Proposals 1b (minimum standards for data visualisation tools) and 1c (requirement to provide compiled system-level data on a regular basis for publication), we intend to explore the introduction of a new licence condition to improve the quality of connections data as a whole.
- 1.70. We consider this new licence condition should require connections data to be (1) accurate and complete, and (2) as close to real-time as is feasible, with monthly updates at a minimum. This requirement would apply to both the data that feeds into visualisation tools, and the compiled system-level data for publication.**
- 1.71. We have carefully considered the option of introducing an incentive to reward performance of network companies in relation to this new licence condition. We have decided not to do so, because accurate, complete and timely connections data is something we expect from network companies as a minimum standard. We do not feel that an incentive in this space, relating as it does to a minimum expected standard, would represent good value for money for energy consumers.
- 1.72. We recognise that implementation of a new licence condition will take time, and that the need for more accurate, complete and timely data is urgent if CP2030 is to be achieved. Network companies have previously demonstrated good examples of aligning their efforts with new proposals in advance of them becoming regulatory requirements. For example, provision of compiled system-level data using an agreed template started to happen before we proposed introducing a licence condition to require it. We have confidence that network companies understand the urgency for better quality data and will continue their efforts to comply with our proposals around data accuracy, completeness and timeliness as soon as practicable.

Data veracity

- 1.73. In advance of any new licence condition coming into force, we strongly recommend that network companies undertake a data cleansing exercise to ensure that the data they are providing is accurate and complete. It is of particular importance that this data cleansing exercise takes place as soon as practicable, ideally before the next TMO4+ application window in Spring 2026.
- 1.74. We have also considered the option of an independent audit of connections data, as suggested by several developers and grid intelligence providers. We have

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decided against this option, as it would be a one-off exercise, only providing an overview of the accuracy and completeness of connections data at a single point in time. Instead, we strongly recommend that network companies provide functionality within their data visualisation tools and compiled system-level data reports for connecting customers to request corrections, if they spot any data that is incorrect, and point out gaps where data is missing. This functionality would act as a continual and enduring independent mechanism for feedback and oversight, which we consider to be preferable to a one-off audit event. We do not rule out the option of introducing a requirement for an independent audit in the future and will keep this issue under review.

Real-time data

1.75. Assessment/triage as to whether data can be provided in real time will need to factor in any data sensitivities, such as security needs or commercial requirements. Delaying publication or sharing of data (until a reasonable length of time after the event) is an effective technique for managing data sensitivities. Ofgem’s Data Best Practice Supporting Information²⁷ provides more information on this topic. We intend to stipulate that network companies endeavour to provide real-time data where it is feasible to do so, noting the need to factor in any data triage that needs to take place. We expect to define the minimum update frequency as monthly, as the majority of respondents to our consultation expressed the view that bi-annual update is insufficient for their needs. We welcome your thoughts on challenges to provision of real-time data.

Data granularity

1.76. We understand that greater granularity of connections data is needed by many connecting customers, eg, at substation level, for capacity, and GIS data. However, we want to ensure that an appropriate balance is struck between network companies providing more granularity where it is useful, and requiring network companies to provide data as standard that is only of rare use to a small minority. It is our view that industry is best placed to advise on this. **Therefore, we have asked network company groups to convene workshops with industry stakeholders to agree a comprehensive list of useful data to meet the needs of the majority of connecting customers. We anticipate ENA and NESO will have a role in coordinating these industry working groups.**

1.77. These workshops should also consider whether certain datasets need to be prioritised for quicker access, eg, data critical to achievement of CP2030 targets. We expect this process to be informed by the non-confidential responses to our consultation that we have made available on our website.²⁸

²⁷[Data Best Practice Supporting Information](#)

²⁸[Connections end-to-end review of the regulatory framework | Ofgem](#)

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- 1.78. We will consider further how provision of this complied / agreed list of data should be required in regulations. We welcome stakeholder views on the available options, such as:
- i. an industry guidance document to house the list linked to a licence condition requiring that the data is provided; or
 - ii. an industry-led code modification.

Demand data

- 1.79. Many consultation responses emphasised the urgent need for greater granularity of demand data, and there were several calls for a capacity register, similar to the ECR, specifically for demand connections.
- 1.80. We consider there is strong need for greater transparency on accepted demand connection offers and their locations at both transmission and distribution level. At distribution level, we believe that the LTDS reforms put in place by Ofgem will support connections applicants; however, the 6-monthly nature of the LTDS means it cannot give the required transparency on new connection acceptances for developers. This creates uncertainty for connections applicants.
- 1.81. We are aware of discussions taking place in industry relating to DNOs releasing demand connection data openly; however, we understand that DNOs consider themselves to be restricted from doing so by section 105 of the Utilities Act 2000. Whilst this restriction may be in the interest of individual companies, we believe overcoming this restriction, if the legislative and regulatory framework allows would benefit all developers current and future.
- 1.82. **We are therefore exploring options to introduce a requirement for network companies to publish a ‘Demand Capacity Register’, similar to the ECR, into the regulatory framework.** This would allow DNOs and TOs to publish demand connections data openly, subject to open data triage.
- 1.83. We expect NESO and network companies to work together, alongside developers, to determine an appropriate home within the regulatory framework (eg, a new licence condition or a code modification) for the requirement to produce a Demand Capacity Register (DCR). We expect to see a recommendation as soon as possible, and we will keep this under review.
- 1.84. We expect industry to collectively determine the exact fields required in the DCR. In line with other decisions with respect to connections data outlined in this document, we will require the DCR to be updated at least monthly, though we would encourage network operators to bring any registers as close to real time as practicable (and economically valuable).
- 1.85. Whilst any DCR would take time to implement, we expect network companies to support developers in the interim period to access demand data. We expect

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NESO and the network companies to continue regular engagements with developers to discuss their data needs.

- 1.86. We expect that any DCRs will benefit from being linked to their relevant DNO's order of work for network build. Whilst this will support internal planning and operation by DNOs, it will also support the developer community in understanding where new capacity may become available or where new constraints may arise.

Data visualisation tools

- 1.87. Our vision for a single digital view is a centralised, interactive data visualisation platform that displays current, historical and future (forecasts) information for both transmission and distribution networks in one unified interface. Key characteristics could include:

- i. integrated data sources - eg, combining datasets from the ECR, the TEC register and the new DCR
- ii. single access point - users will be able to view all relevant connection data without navigating multiple systems
- iii. dynamic visualisation - eg, interactive maps to show network capacity and constraints, and dashboards for connection timelines, queue management and available capacity
- iv. as close to real-time updates as possible - to reflect the latest status of applications, outages and capacity availability
- v. user-friendly functionality - eg, function to filter by region, voltage level, technology type and connection stage, and a search function

- 1.88. There was strong consensus amongst consultation respondents for a staggered approach to implementation of a single digital view across transmission and distribution, with focus on improvement of the existing tools in the short term. Ofgem agrees with this approach.

- 1.89. We also recognise the concerns raised around the costs in time and resource of creation and implementation of a single digital view at a time when there has been unprecedented change in the sector in the form of CP2030 targets and Connections Reform. We will, therefore, require a Five Case Business Case²⁹ to be undertaken to inform whether creation of a single digital view is worthwhile.

- 1.90. A Five Case Business Case is a structured framework used in UK public sector and infrastructure projects that ensures decisions are robust, transparent, and deliver value for money. It includes:

1. **Strategic case**, ie, why the project is needed, alignment with policy objectives and strategic priorities

²⁹ [Business case guidance for projects and programmes - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/Business_case_guidance_for_projects_and_programmes_-_GOV.UK.pdf)

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2. **Economic case**, ie, demonstrates value for money, includes cost-benefit analysis
3. **Commercial case**, ie, how the project will be procured and delivered
4. **Financial case**, ie, affordability and funding source(s)
5. **Management case**, ie, how the project will be managed and governed, risk management and delivery plans

1.91. The business case should compare the option of a single digital view with the status quo, which is individual data visualisation tools for each network company that are interoperable and accessible from a single webpage.

1.92. We also recommend a principle such as the MoSCoW³⁰ prioritisation technique is used to determine what functionality the first iteration of the tool must have and should have, and what functionality could be added now if time and resource permits or won't be added until a future iteration of the tool.

1.93. Ofgem is clear that the accessibility of raw input data should be the priority in the short term, and this is why we will introduce a new licence condition focussing on data quality (as discussed above). However, concurrently to improving data quality, we expect network companies to work towards interoperability of their existing data visualisation tools. Funding has been provided for interoperability in previous years through the RIIO price controls. It is our understanding that progress towards interoperability has been inconsistent across network companies and that a clearly defined goal is needed to accelerate progress in this space.

1.94. Achieving interoperability requires standardisation of data, processes, and technology across transmission and distribution networks. Interoperability was a key objective for the RIIO-ED2 and RIIO-T2 price control periods (2023-2028 and 2021-2026 respectively). Some of interoperability's key benefits are:

- i. it improves data sharing and collaboration between network companies
- ii. it reduces costs by eliminating the need for expensive custom integrations
- iii. it reduces errors caused by incompatible systems or manual data transfer
- iv. it makes it easier for network companies to adopt new technologies without replacing existing systems
- v. it is a crucial component of creating a smart, flexible and low-carbon energy system

1.95. More details on interoperability and its benefits can be found in Ofgem's Data Best Practice Supporting Information linked above.

1.96. We have engaged with NESO and the ENA and have gained agreement from them to work together and with industry to:

³⁰ [MoSCoW Prioritisation - DSDM Project Framework Handbook | Agile Business Consortium](#)

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- i. **produce an ambitious timescale for interoperability of the existing digital view tools** - our view is that it is possible for full interoperability to be achieved within RII0-ED2 and RII0-T3 price control periods
- ii. **undertake a Five Case Business Case for a single digital view across transmission and distribution** - analysis to be undertaken during RII0-ED2 funding period
- iii. **produce an ambitious but realistic timescale for creation and implementation of a single digital view, if the Five Case Business Case concludes that the benefits of a single digital view to connecting customers and to achievement of government objectives (with respect to decarbonisation and economic growth) outweigh the costs of its creation and maintenance, and that it will provide tangible benefits in comparison to the status quo** - implementation, if agreed upon, would take place during ED3 and RII0-T3 funding periods

Overcoming barriers to the sharing of data

- 1.97. Ofgem is clear that there is a need for connecting customers and other interested parties, including third parties providing connection services, to have access to useful data to inform their decisions on connection applications, improve application quality, and ensure that connection offers are more aligned with expectations. We are of the view that, in line with Ofgem’s Data Best Practice Guidance, all data should be openly shared (either through publication or via a data visualisation tool) unless data triage reveals certain sensitivities which would make openly sharing or publishing certain data inadvisable or unlawful.
- 1.98. Consultation feedback was clear that, whilst connecting customers understand that certain data cannot be openly shared for reasons of, for example, national security, they are concerned that data triage processes are inconsistent between network companies and between transmission and distribution, with some network companies openly sharing data of a type that others claim is too sensitive to share. **Ofgem agrees with this assessment of the current situation, and, therefore, we have agreed with network company groups that they will convene workshops with a view to standardising data triage processes for connections-related data across transmission and distribution. We anticipate ENA and NESO will have a role in coordinating these industry working groups.**
- 1.99. Ofgem is clear that network companies should be taking a security-minded approach to the sharing of connections data, and that data which poses a risk to critical national infrastructure must not be openly shared. However, when it comes to data that is commercially sensitive, there is a judgment call to be made as to whether the data in question is A) not sensitive enough to justify being treated any differently and, therefore, can be openly shared, B) too sensitive to share openly, or C) could be shared openly by using one of the techniques to overcome data sensitivity mentioned in Ofgem’s Data Best Practice Supporting

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Information, eg, delaying publication, aggregation and anonymisation.

Standardisation of network company data triage processes will ensure that all network companies are using the same criteria when making decisions as to whether a certain piece of data falls into category A, B or C.

- 1.100. If data falls into category B (too sensitive to share openly), then it should still be possible for industry participants to access this data in some way if needed. Likewise for any data falling into category C that has been modified before publication to deal with its sensitivity (eg, it was aggregated or anonymised), there should still be a place for industry participants to view the full dataset without modification.
- 1.101. **We propose that sensitive connections data be exchanged via the DSI³¹, which will be a governance and technological solution to enable secure and standardised data exchange between energy system participants.** The DSI will have functionality to allow organisations to validate participants' identities, as well as configure and control different access levels for different types of participants on a use case basis, making it a trustworthy and secure solution for sensitive data exchange. The DSI is currently in its early development stages, with the aim of a minimum viable product (MVP) being ready by Q1 2027.
- 1.102. If we decide to proceed with open sharing and publication of non-sensitive data, with sensitive data exchanged using the DSI, then it is our intention to explore introducing a new licence condition requiring network companies to follow agreed data triage processes and to share all of their data either openly or via the DSI as the results of triage dictate. It is our view that a prescriptive licence condition is necessary to overcome data protection requirements, such as section 105 of the Utilities Act 2000. We welcome your views regarding the use of the DSI for the sharing of sensitive connections data.

³¹ [NESO to coordinate the delivery of energy data sharing infrastructure | Ofgem](#); [Virtual Energy System: Data Sharing Infrastructure pilot progress to improve energy system efficiency and resilience | National Energy System Operator](#)

Decisions and proposals

DECISION 1.1. Network groups to convene workshops with industry stakeholders to agree a comprehensive list of useful connections data for network companies to publish.

DECISION 1.2. A new requirement for network companies to publish a Demand Capacity Register, with a minimum data update frequency of monthly. NESO to liaise with network companies and developers to determine an appropriate home for this requirement.

DECISION 1.3. Network groups to work with industry to agree ambitious timelines for the:

a. interoperability of existing digital tools

b. implementation of a single digital view across transmission and distribution

NESO/ENA to undertake a Five Case Business Case for the single digital view ahead of any decision as to whether it should be implemented.

DECISION 1.4. Network groups to convene workshops to agree data triage processes for connections, with the intention of developing a consistent, robust, security-minded process that can be used across transmission and distribution. Guidance for this process should clearly set out which types of data should not be shared publicly.

PROPOSAL 1.1. We will explore the introduction of a new licence condition requiring connections data to be:

a. accurate and complete

b. as close to real-time as is feasible, bearing in mind any potential security risks of real-time data, with monthly update at a minimum

This requirement will apply to both the data that feeds into the data visualisation tools and the system-level data compiled for publication

PROPOSAL 1.2. Ofgem will explore leveraging Ofgem’s Data Best Practice Guidance to ensure that all useful connections data is ‘presumed open’. Sensitive data should be exchanged using the DSI when the solution is live.

New questions

Q1.1. Do you agree with Proposal 1.1. to introduce a new licence condition for accurate, complete and timely data?

Q1.2. Do you agree with Proposal 1.2. to split data into open and sensitive categories, and to use the Data Sharing Infrastructure to share sensitive data?

Anything else:

Q1.3. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**Next steps****Decision 1.1.**

1.103. We recommend NESO and ENA to convene workshops with industry stakeholders (developers and network companies) to agree a comprehensive list of useful connections data for network companies to publish. Networks, via the ENA SCG, will report on the progress of this work to the Connections Delivery Board (CDB), which is chaired by Ofgem. Representatives from network groups and Ofgem will also meet on a regular basis to discuss any issues relating to the list that require Ofgem advice and input.

Decision 1.2.

1.104. NESO will liaise with industry stakeholders to agree the data fields for inclusion in the Demand Capacity Register, and explore where this new requirement could sit within the regulatory framework. NESO will report on progress to the CDB. Ofgem and NESO representatives will meet on a regular basis to discuss any issues requiring Ofgem input.

Decision 1.3.

1.105. Network groups to work together to provide a timeline for interoperability of existing data visualisation tools. We require network groups to undertake a Five Case Business Case for the single digital view, subject to Ofgem providing more specific detail as to what is required. This work will commence in early 2026. Progress of this workstream will be monitored by Ofgem through the CDB.

Decision 1.4.

1.106. Network groups to convene workshops to agree data triage processes for connections, with the intention of developing a consistent, robust, security-minded process that can be used across transmission and distribution. This process will be set out in industry guidance. Input will be required from Ofgem, DESNZ and the security services. Progress of this workstream will be monitored by Ofgem through CDB.

Proposal 1.1.

1.107. Ofgem will in time undertake a statutory consultation on the specific wording of the new licence condition relating to accuracy, completeness and minimum update frequency of connections data.

Proposal 1.2.

1.108. Ofgem will in time undertake a statutory consultation on the specific wording of a new licence condition relating to open and sensitive data.

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Theme 2: Improved standards of service across the customer journey (not including “smaller connections”)

- 2.1. This theme covers major connection customers only.³² Due to significant differences in the customer journey between smaller and major connections, standards of service in smaller connections are covered separately in Theme 6.

Problem statement

- 2.2. Limited standards of service requirements apply to the DNOs, TOs and the NESO during certain phases of the connecting customer journey. Standard of service requirements are generally focused on the application and offer creation stages, rather than the pre-application stage.
- 2.3. For the stages of the customer journey where standards do apply, such as at the offer creation stage, alignment and duplication checks across the regulatory framework are required to ensure it works efficiently and harmoniously.

Goal

- 2.4. To ensure standards of service requirements across all stages of the connections customer journey are fit for purpose in driving the right behaviours and outcomes, and that the different levels of the regulatory framework work in harmony. This should apply to all connecting customers to ensure that those at all voltage levels receive good and consistent service.

Summary of issues we identified in the consultation

- 2.5. Here we summarise the issues we originally identified and set out in the original consultation. See the original consultation for more detail.

Inconsistency of standards of service along the customer journey

- 2.6. There are no clear expectations on the required level of customer engagement from regulated parties across the entirety of the end-to-end journey, which means customers can lack clarity on what is expected from the NESO, TO or DNO at each stage.
- 2.7. Whilst there are several obligations centred around the provision of a quote/offer stage, there are limited standards defined elsewhere along the customer journey.

³² Major connections consists of all connections other than those that classify as minor connections, in line with the terminology used in the [ED3 SSMC document](#).

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More focus should be required on the steps post-offer acceptance. This can be classified into two main phases: pre-delivery and delivery.

Suggestions for new timeliness requirements along the customer journey

- 2.8. Additional prescription should be considered to define required standards of service or timeframes at different stages of the customer journey. Potential new prescribed timeframes could be identified across the connections customer journey, including in the pre-application stage, the post-offer stage and in later stages of project development.

Transmission/distribution interface

- 2.9. The original consultation identified several problem areas of inefficient interaction between TOs, DNOs or NESO outside of a direct customer relationship, that either caused unnecessary delay or disadvantaged the customer's queue position.

Stakeholder views

- 2.10. This section summarises the responses we received to each of the questions in the consultation in turn.

Question 2a: The issues

Do you agree with the issues we have set out under Theme 2 - Improved standards of service across the customer journey (not including “smaller connections”)? Are there any other issues under this theme that we should consider or be aware of?

- 2.11. The majority of stakeholders agreed with the issues set out under Theme 2. Concerns around accountability, clarity and transparency of standards of service, and the possible consequences of changes were noted. There was also strong feedback for providing a more consistent standard of service across network companies.
- 2.12. Many stakeholders said that principles-based licence conditions currently in place do not foster meaningful accountability because they are too subjective and hard to enforce. Respondents argued that terms like “reasonable steps” allow DNOs and TOs to claim compliance without clear evidence. They also noted that there is little practical enforcement under existing standards, meaning customers have limited recourse when obligations are not met.
- 2.13. According to responses, clarity and transparency issues stem from ambiguity in existing obligations and poor communication throughout the customer journey. Stakeholders also noted that standards and timelines are not well publicised, and communication from DNOs and TOs is often inconsistent or absent, leaving customers without reliable information on progress. Many respondents

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advocated for a balanced approach of combining minimum standards with clear guidance and improved communication to ensure obligations are understood and consistently applied.

- 2.14. A minority of respondents instead considered that the issues raised did not match the reality of the connections customer experience, and that current standards and processes were producing adequate outcomes.

Question 2b: Standards of service: principles-based condition

Do you have any views on Proposal 2a (general principles-based licence condition and supporting guidance around standards of service throughout the entire customer journey)? Do you have any views on how this could be implemented?

Proposal 2a. Principles-based licence condition, and supporting guidance, on DNOs, TOs and the NESO around standard of service required throughout the customer journey.

- 2.15. The responses to this question concerned Proposal 2a. However, as Proposal 2b was frequently mentioned in stakeholder responses to this question, we have referred to them both in this summary.
- 2.16. Respondents generally preferred the more prescriptive approach set out in Proposal 2b, but many would encourage the principles-based approach of Proposal 2a if minimum standards were not considered feasible. Some respondents who supported principles-based licence conditions felt they would only work if a penalty/incentive mechanism was introduced to encourage compliance.
- 2.17. A few respondents encouraged the introduction of both proposals as a principles-based approach would allow for flexibility, whilst a more prescriptive approach would allow for consistency.
- 2.18. There were concerns over Proposal 2a, which include:
- i. principles-based conditions might not change the inconsistency of current outcomes for customers; specifically, many respondents felt that only a prescriptive licence condition would both affect and standardise behaviour from regulated parties to suitably meet expectations
 - ii. it would lead to tension between customer and network companies due to the subjectivity of what would be considered suitable standards; many felt that a principles-based licence conditions would be too loosely interpreted by network companies, whereas many network companies felt any ambiguity or subjectivity might lead to speculative customer appeals
 - iii. principles-based conditions would be unenforceable and there would be no accountability, reducing compliance; responses frequently compared Proposal 2a unfavourably to alternatives such as Proposal 2b, incentives in price control frameworks or financial penalties

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**Question 2c: Standards of service: prescriptive conditions**

Do you have any views on Proposal 2b (new prescriptive condition(s) around standards of service)? Do you have any proposals for any specific areas of the connections customer journey that should be subject to such a requirement?

Proposal 2b. New minimum standards licence conditions and/or SLAs on DNOs, TOs and the NESO around standards of service required throughout the customer journey. Minimum standards could be accompanied by incentive or penalty mechanisms to further drive compliance.

- 2.19. Overall, stakeholders preferred the minimum standards licence conditions of Proposal 2b. Whilst network companies generally disagreed with either proposal, they preferred minimum standards.
- 2.20. Currently, stakeholders consider there to be a lack of accountability for shortcomings of service delivery, and developing minimum standards would increase confidence in network companies.
- 2.21. Stakeholders highlighted that there should be consistent standards of service across the whole customer journey. Current regulations should be expanded to include communications such as responses to questions, interactions when there are changes, when clarifications are needed or when issues arise. The asymmetry in the quality of information required was also mentioned. It was noted that network providers expect connecting customers to provide detailed and specific information, but do not have set standards themselves of equivalent veracity.
- 2.22. Many stakeholders noted the risks of implementing further standards of service, such as costs being passed on to customers due to rising risk management requirements. It was highlighted that careful consideration is required to ensure any prescriptive milestones are balanced, achievable and that there is limited negative impact onto customers. Respondents believed that consideration into how these are monitored and enforced is also required, and that there should be regular assessments to understand if standards of service are suitably high.
- 2.23. Respondents from a range of stakeholder groups suggested that minimum standards be paired with an incentive / reward in the event that standards are exceeded, for full effectiveness. Specific incentive proposals included:
- i. financial rewards and penalties
 - ii. reputational incentives like publicly available ranking tables, or a more visible publication of standards breaches
 - iii. basing prescriptive conditions on measured customer satisfaction scores, such as those obtained through the MCCSS, rather than processes or timeframes
- 2.24. Prescriptive conditions were considered by some network companies as being excessively burdensome. Proposal 2b was indicated by some to not provide

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sufficient clarity or give meaningful guidance on expected standards in the long or short term for network companies, customers and Ofgem. Some thought that introducing minimum standards would undermine existing customer-focused behaviour by shifting business focus to compliance management.

Question 2d: Revision of existing standards of service

Do you consider that any of the existing standards of service requirements set out in the regulatory framework for provision of specific products / services should be revised or removed? Do you consider that there is any duplication or overlap of regulatory requirements across the regulatory framework that needs addressed?

- 2.25. There were fewer responses to 2d. Most responses focused on the aspect of the question regarding revising or removing current standards, with few responses regarding duplication of regulatory requirements.
- 2.26. Respondents often expressed a feeling of inadequacy around particular current regulations, most frequently GSoPs. GSoPs are covered in Theme 3 of this review, and so will not be addressed here.
- 2.27. Some respondents suggested revising the wording of current regulations to be either more robust or more specific. Terms used to indicate levels of practice such as ‘best endeavours’ were considered to be of limited use given different interpretations and standards across the industry.

Question 2e: Additional comments

Is there anything else regarding Theme 2 – Improved standards of service across the customer journey (not including “smaller connections”) that you consider we have missed?

- 2.28. This question received the fewest responses, with no strong consistent themes across the responses given.
- 2.29. The desire for an increase in the amount of communication between network companies and customers was the most common response of those given. Good communication is considered a key element of an effective customer journey – we address this both below, and in Theme 4 where we discuss communication expectations relating to offer provision.
- 2.30. Some respondents advocated for a more extensive complaints and/or compliance system, such as a bespoke dispute resolutions body, or a new mechanism through which customers can raise concerns. There is clear stakeholder concern in this area even if there was no consensus over solutions. Related measures on determinations is covered in Theme 7.
- 2.31. Finally, some stakeholders used Question 2e to express concern over potential gaps or lack of focus on the pre-application stage of a project’s lifespan.

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Our response and analysis

2.32. Having reviewed all responses and following further discussions with stakeholders, we have decided to progress two policy options, prescriptive licence conditions and a principles-based licence condition. To note again, we are considering this review and the ongoing development of ED3 incentives holistically, and are clear that some of the proposals set out below may be furthered through the ED3 design work where appropriate.

Prescriptive licence conditions

2.33. **We will pursue the development of prescriptive licence conditions that specify minimum requirements in relation to standards of service.** These requirements would be informed by specific milestones at pre-application and post-offer acceptance stages of the connection process.

2.34. We agree with respondents that in order to promote excellence and standardisation across network companies and customer journeys, clear and specific obligations are required.

2.35. We also consider that transparent reporting of compliance with the requirements is important to ensure transparency of performance for all parties.

2.36. We intend to make the prescriptive licence conditions ambitious, yet achievable in order not to increase costs for end customers and to not negatively impact the time it takes NESO and DNOs to issue offers, and for TOs to provide supporting information. We are therefore keen to explore through this consultation the specific milestones that would achieve a proportionate outcome.

2.37. An example of an appropriate milestone / timeframe for a prescriptive licence condition would be where a network company or NESO is in possession of all relevant information and submissions and any delay, beyond that reasonably needed to formulate a quality response, acts as a 'blocker' that prevents a timely delivery of service. This extends to delays and inadequacies surrounding communication and other processes.

2.38. We recognise that some milestones will be more difficult to prescribe than others, and all remain subject to further policy development to ensure they are proportionate and will drive the right outcomes.

2.39. The following is a set of non-exhaustive proposals for milestones that we consider may represent appropriate points within the customer journey for minimum standards to apply:

Pre-application stage

1. **A timeframe within which the regulated party must respond to customer's initial contact.** This is to assure connecting customers that their pre-application interest has been received and is being processed, reducing uncertainty for the

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customer. Note, this is separate from current obligations to provide quotations or budget estimates in response to formal requests.

2. **A timeframe within which the regulated party must offer a pre-application discussion**, once requested by a prospective customer.
3. **Minimum requirements on the scheduling of connection surgeries for pre-applicants**. Both this and the above milestone could be accompanied by minimum requirements or proof of intent on the prospective customer's behalf, to prevent network companies needing to respond to overly speculative / inappropriate meeting requests.

Post-offer stage

1. **A minimum timeframe for regulated parties to respond to project-specific post-offer communications**. Again, this will reduce uncertainty for the connecting customer.
2. **A minimum timeframe for a formal programme 'kick-off' meeting between network company and customer**, following the offer being accepted by the customer.
3. **Key project personnel assignments, such as project manager, should be confirmed within a set timeframe**. We would like to hear views on the breadth of roles that this condition could cover.
4. **A minimum standard for the timeframe associated with the detailed design stage**, likely varying across technology and customer types, as there is clear feedback that delays here have been a blocker to some connection customers.
5. **Minimum timeframes attached to the arranging and completion of vital survey works by network companies**. We would like to hear views on which types of surveys would be appropriate to attach timeframes to.

2.40. Whilst the proposals above focus on timeliness, there is still scope for prescriptive standards to target other behaviours, such as quality and clarity of communications. We welcome stakeholder views.

2.41. Finally, we note that the timeliness of submission of a project for Transmission Impact Assessment (TIA) from a DNO to NESO was proposed for a new prescriptive licence condition in the consultation. However, there are now clear regulatory requirements in place covering this process introduced through connections reform, so we are not taking this forward.

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2.42. We take this opportunity to reiterate that TIA thresholds³³ should be kept under review and increased where possible to ensure distribution connections are as timely as possible, as was the case in England and Wales through CMP446.³⁴ We will continue to monitor progress on the review of TIA thresholds through the CDB.

Principles-based licence conditions

2.43. We will explore the introduction of principles-based licence conditions to support the proposed prescriptive licence conditions.

2.44. The intention is for a principles-based licence condition to set a clear expectation on what constitutes an acceptable standard of service throughout the customer journey through the connections process.

2.45. Stakeholders noted concerns that principles-based licence conditions could be ineffective if introduced in isolation. In this context we are proposing them here to support the more enforceable ‘bite’ of the prescriptive licence conditions, which target inadequate service at specific milestones.

2.46. For example, a principles-based licence condition could make clear the expectation of clear and timely communication from network companies to customers at all stages of the customer journey, so not just at the specific milestones covered by the prescriptive conditions. For example, to clearly communicate cost or scope changes during the customer journey as soon as reasonably practicable once the network company becomes aware of them. It is critical to connecting customers that they have full transparency over any changes that could potentially impact their project, as far ahead of time as possible.

2.47. Another specific example where a principles-based condition could be more appropriate than a prescriptive condition is around minute-keeping. Some connecting customers have raised this as an issue, ie, where discussions in meetings have not been accurately recorded by the regulated party, resulting in delays. We consider that a prescriptive condition here would be overly burdensome and not appropriate, however a principles-based licence condition ensuring network companies appropriately monitor and record key information resulting from customer communication could achieve the intended outcome.

2.48. Similarly, stakeholders have raised issues where major delays have been caused by network companies losing important files or data for their project. A principles-

³³ TIA thresholds are the capacity levels defined to determine when a project seeking to connect at distribution must go through the TIA process. If the capacity of the project is above the threshold, a TIA is required. The thresholds vary across the three TO regions.

³⁴ [CMP446: Increasing the lower threshold in England and Wales for Evaluation of Transmission Impact Assessment \(TIA\)](#)

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based licence condition could include wording requiring consistent care of customer data throughout the connections process.

- 2.49. Principles-based licence conditions also have the benefit of allowing regulated parties to decide how best to comply with them. We do however anticipate setting out our expectations of the types of behaviours / processes we would be looking to see.
- 2.50. Whilst we are not proposing specific wording as part of this consultation, we would like to hear stakeholder views on the types of process and behaviours that should be targeted through principles-based licence conditions.
- 2.51. We want to be clear how this theme interacts with Theme 4: Quality of connection offers and associated documentation. In summary, we consider the proposals in that theme will improve the overall standards of service around quality of communication specifically regarding provision of offers, whereas the proposals within this theme intend to apply minimum standards of communication (both in terms of timeliness and quality) across the whole journey.
- 2.52. We also want to be clear that these proposals are not mutually exclusive with any decisions made through the ED3 design process. As part of that process we have proposed alterations to the connections incentives to ensure DNOs to offer better service to connecting customers. We have consulted on these proposals via the ED3 SSMC³⁵. We want to be clear that we will develop our proposals as part of this review and ED3 design holistically, ensuring both processes are informed by one another and that the outcomes do not inappropriately or unhelpfully duplicate or overlap.

Third party works

- 2.53. Third Party Works (TPW) is the process through which an application for connection at transmission is assessed for its impact on the downstream distribution network. The process involves various stages of communication and information transfer between the connecting customer, NESO, TOs and DNOs.
- 2.54. The timeliness of the various stages of this process have been raised as key problem for some transmission-connecting customers. They have noted that the lack of standardisation in the TPW process, including within the regulations, has had clear impacts on the cost and delivery of some projects. Some developers have reported having to wait multiple years for confirmation of the TPW requirements of their projects.

³⁵ [Sector Specific Methodology Consultation – ED3](#)

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- 2.55. We agree that there are several clear gaps in the TPW process as it currently exists. Some of these issues, such as quality and timeliness of communications, are repetitions of those that are at the core of this theme.
- 2.56. We consider that it would be ineffective to attempt to address the issues within the TPW process as part of this review, particularly as it is a process so explicitly linked to the new reformed connections process and associated timelines.
- 2.57. **We instead expect industry to progress with code modification proposals that address the current gaps in service levels and communication, as part of wider changes to standardise the TPW process within the context of the new reformed connection process.**
- 2.58. We recognise that industry have already attempted to address this through the code modification CMP 328.³⁶ However, we are unclear as to whether the scope of that modification would result in the changes needed to TPW to deliver the intended outcome of a smooth, transparent process underpinned by clear quality and timeliness requirements. We expect industry to consider whether CMP328 remains viable for achieving the enduring reform needed and, if not, whether a new modification is required.
- 2.59. We will continue to monitor progress on this issue through the CDB.

Decisions and proposals

DECISION 2.1 We will explore the introduction of prescriptive licence conditions attached to milestones in the customer journey.

DECISION 2.2 We will explore the introduction of principles-based licence conditions targeting standard of service improvements throughout the entire customer journey.

PROPOSAL 2.1 We are proposing a list of potential milestones to assign prescriptive licence conditions to.

³⁶ [CMP328: Connections Triggering Distribution Impact Assessment](#)

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Q2.1. Do you agree with Proposal 2.1, ie, the milestones we have set out for inclusion in the prescriptive licence conditions? Are there any other milestones we should consider?

Q2.2. What processes / behaviours within the connections customer journey could be targeted effectively with a principles-based licence condition?

Anything else:

Q2.3. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Next steps

2.60. We will progress the design and development of both the prescriptive ‘minimum standards’ licence conditions and principles-based licence conditions immediately and in parallel with the further consultation we are undertaking as part of this process. We then expect to consult further once we have a set of more developed proposals in the near future. We note that any licence changes remain subject to the relevant statutory consultation processes.

2.61. We note again the crossover with the development of these new licence conditions and the ongoing work to develop the ED3 framework, as discussed in the SSMC.

Theme 3: Requirements on networks to meet connection dates in connection agreements

Problem statement

- 3.1. There is limited scope for network companies to be held to account against timeframes for delivery of individual connections, and the products and services required to facilitate them, once a connection agreement is in place. This could include connection-specific network build as well as wider reinforcement works. This can result in connecting customers experiencing connection dates later than agreed in their connection contract, and in some case, can render their project(s) unviable. This often results in substantial financial losses incurred by customers.

Goal

- 3.2. A regulatory framework that ensures there are proportionate requirements on network companies to meet agreed customer connection dates in connection agreements, and commensurate with those on developers to meet development milestones.

Summary of issues we identified in the consultation

- 3.3. We discussed the current delays surrounding connection dates and identified areas that could be improved. We recognised that network companies have been, on occasion, slow to complete works and communicate with the customer. There are many stages at which delays occur throughout the customer journey, and these delays can impact project costs and project viability.
- 3.4. We also identified that there is little available by way of customer recourse, to mitigate the costs to the developer caused by these delays. Furthermore, there is currently limited commercial exposure to network companies within the connection agreement, should delays within the network companies' control occur.

Stakeholder views

- 3.5. This section summarises the responses we received to each of the questions in the consultation in turn.

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**Question 3a: The issues**

Do you agree with the issues we have set out under Theme 3 - Requirement on networks to meet connection dates in connection agreements? Are there any other issues under this theme that we should consider or be aware of?

- 3.6. Stakeholders overwhelmingly agreed with the issues we set out. They highlighted a strong support for minimum standards and financial penalties/incentives. Generally, stakeholders suggested that there was a perceived lack of accountability within network companies when delays were occurring, a lack of transparency in why the delays occurred, and an overall lack of communication and progress reporting.

Question 3b: Meeting connection dates: principles-based condition

Do you have any views on Proposal 3a? Do you have any views on specific wording that would achieve the intended outcome?

Proposal 3a. A strengthened principles-based licence requirement for DNOs, TOs and the NESO to ensure that they meet connection dates in connection agreements, and to provide timely and accurate information to developers in relation to issues that may impact their connection date or project viability.

- 3.7. Generally, stakeholders were unsupportive of a strengthened principles-based licence condition around meeting connection dates. The consensus view amongst respondents was that changes to licences were required, but most preferred Proposal 3b (more prescriptive licence conditions) to Proposal 3a. Some respondents advocated for a hybrid approach of the two proposals.
- 3.8. Those that did agree stated that there must be a focus on the transparent communication of accurate and timely information regarding changes between network companies and connecting customers. Other respondents suggested revisiting current conditions would only have value if there was a financial instrument to incentivise adherence to the conditions, or if other requirements were added or strengthened, such as response timelines, engineering design reviews, and reviewing connection offer timeframes. They explained this is because missed intermediate milestones often contribute to final delivery delays.
- 3.9. Whilst several respondents acknowledged that the current principles-based licence condition is useful, ie, the duty to connect on request as soon as practicable, the majority argued that these requirements are too high-level and do not ensure timely connections. It was argued that the existing licence condition does not work effectively so introducing further principles-based

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obligations will not deliver the intended outcomes, due to ambiguous, subjective language that makes compliance difficult to assess.

- 3.10. Other concerns raised around the perceived ambiguous language included a lack of ability to enforce against the condition, and a lack of transparency of meaning for all parties.
- 3.11. Additionally, some respondents proposed that strengthening the principles-based licence condition would only be effective if introduced in combination with specific minimum standards. For example, requiring provision of maximum timeframes between date agreement and completion of works, as well as clear and transparent communication of regular updates to ensure accountability.

Question 3c: Meeting connection dates: minimum standards

Do you have any views on Proposal 3b? Do you have any views on specific standards that could be introduced and how they would work in practice?

Proposal 3b. Minimum standards licence condition or SLAs for DNOs, TOs and the NESO to ensure they meet connection dates in connection agreements and key timelines through the customer journey. Minimum standards could be accompanied by incentive or penalty mechanisms to further drive compliance.

- 3.12. This was the preferred approach, with widespread agreement between respondents.
- 3.13. It was acknowledged that there are currently GSoPs (The Electricity (Connection Standards of Performance) Regulations 2015) in place covering connection delivery, however, these apply to DNOs only, not TOs. Further, these were perceived by respondents to, on occasion, not being correctly adhered to or communicated effectively by the DNO. Some respondents proposed that GSoPs could expand to cover all regulated parties, and more milestones against which GSoPs apply should be introduced. These milestones are discussed in more detail in Theme 2.
- 3.14. Respondents noted that flexibility to account for third-party delays, or the complexity of the connection project, should be considered within the minimum standards.
- 3.15. Some respondents, however, disagreed with this proposal, noting that it would be impractical to expand or introduce new standards without ensuring the current standards are appropriately enforced.
- 3.16. Additionally, network companies stated that this option would be impractical to implement, as there are too many issues affecting delivery that are outside of

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network companies' control, and that current regulations are generally adequate.

- 3.17. Many respondents stated that either proposal (3a or 3b), or a hybrid of both, would only work if communication is improved. This is discussed in Theme 4.
- 3.18. Finally, respondents proposed mechanisms such as public reporting to ensure compliance performance against minimum standards was transparently communicated. Some also suggested an annual third-party audit to assess compliance with licence conditions.

Question 3d: Financial instrument for customer recourse**Do you have any views on Proposal 3c? Do you have any views on how this should be implemented?**

Proposal 3c. A financial instrument that offers recourse to connecting customers who suffer detriment, such as a delayed connection date, due to poor practice on the part of the network company.

- 3.19. Most respondents who answered agreed with the introduction of a financial instrument to improve accountability and ensure connection dates are met. It was generally agreed that current existing financial mechanisms, such as GSoP-mandated automated payments on DNOs and the potential liquidated damages (LDs) provisions in contracts with TOs, are insufficient or not effective.
- 3.20. It was noted that the current amount of financial recourse available to developers does not address the reality of the actual financial losses or other indirect costs that occur due to delays. Some respondents suggested that, when GSoPs are breached, the fine is paid but otherwise it does not affect the speed of the customer's connection project. This suggests current financial mechanisms are ineffective or too blunt.
- 3.21. A key concern raised by respondents was that a new financial instrument may duplicate penalties and cause the following unintended consequences:
- i. prioritisation of risk avoidance instead of innovation, due to the risk to the network company of possible financial penalty
 - ii. offering of unambitious connection dates
 - iii. costs to customers may increase due to risk of penalties being passed on
- 3.22. It was noted that, should a financial mechanism be introduced, it would need to be carefully considered to avoid the negative consequences. Respondents highlighted that there must be transparency in how the financial instrument is quantified. A respondent stated that adequate resources within network companies must be allocated to ensure timely delivery of connections to meet

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CP2030 targets, simultaneously adhering to any new standards that this review will introduce.

- 3.23. Another possible risk identified by respondents is that definitions of poor practice, or what constitutes delays outside of network company control, could be open to interpretation and would make a financial mechanism difficult to enforce.
- 3.24. Some respondents raised alternative proposals, including the possibility of LDs in network company contracts with customers, and a mechanism allowing for reimbursement of customer costs incurred when connections are cancelled at short, or without, notice.
- 3.25. Network companies generally preferred incentives over customer recourse, considering them to be more effective in driving efficient, collaborative delivery and in mitigating the identified risks.

Question 3e: Additional comments

Is there anything else regarding Theme 3 - Requirement on networks to meet connection dates in connection agreements that you consider we have missed?

- 3.26. No additional substantive points were raised.

Our response and analysis

Wider considerations

- 3.27. We agree that more can be done to ensure network companies are held to account against timeframes for delivery of connections. This must be done in lockstep with Themes 4 and 5 of this review. Our aim is to ensure all proposals across the three themes work collectively.

Minimum standards/ GSoPs

- 3.28. We believe GSoPs are the most appropriate way to ensure accountability against timeframes for delivery of connections. We therefore consider that strengthening current GSoPs will effectively incentivise meeting timeframes for delivery of connections.
- 3.29. Current DNO GSoP milestones³⁷, include:
- iv. provision of a budget estimate to be provided within 10-20 working days, and with an £80 fine if provided past that date

³⁷ See here- [DNO Metered Connections Guaranteed Standards of Service for Electricity Distribution Companies in England, Wales & Scotland](#)

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- v. provision of a budget estimate to be provided within 10-20 working days, and with an £80 fine if provided past that date
 - vi. provision of a formal quotation must be provided between 5 – 65 working days, with a £30 - £255 fine every day past that timeframe
 - vii. If an incorrect or incomplete quotation has been provided then a fixed payment of between £43 - £850 is issued, a refund of any overpayment made by the connecting customer
 - viii. Initial contact to schedule work must be made within 7 – 15 working days of correct customer payment, with a fine applicable of between £45 - £245 every day past this deadline. All delays must be communicated clearly and as soon as possible. If the agreed commencement day is missed with no communication between DNO and customer, then there is a £30 per day fine until work commences
 - ix. Finally, if the work is not completed by the quoted day, a fine of between £175 - £340 a day is applicable until work is complete
- 3.30. We consider that these current milestones could be made more ambitious and that the current value of penalties should be reviewed. To note, we do not consider it necessary that they cover 100% of the losses incurred, should delays occur - instead, we consider they should be set at a level that will act to help prevent or lessen delays.
- 3.31. Customers often mention extensive, unjustifiable delays affecting their projects. The impacts on the project ranging from extensive costs incurred to project cancellations. Some customers reported still awaiting connections offered from 2021 or 2022 and are unable to recoup the original payment until the project is completed. Individual project delays reported ranged from six months to four years, whilst losses due to delays ranged from £600,000 to £36.5 million. In some cases, project costs increased between 50% - 200% from the original quote to the final incurred bill. There is a perceived asymmetry between costs that developers incur, and network companies incur as a result of a connection delays.

Expanding GSoPs to include TOs

- 3.32. We note that, currently, GSoPs only cover DNOs. We consider therefore that the GSoP framework could be extended to also cover TOs, to achieve the same policy intent of incentivising timely connections, and ensuring connecting customers have a clear route for financial recourse in the event of delays caused by poor practice. We are seeking stakeholder views on the risks and benefits.
- 3.33. As we noted in paragraphs 2.75 to 2.77 of the original consultation, DNOs are subject to various requirements around minimum standards across the licence and in regulations relating to generation and demand connections. As part of our review of the GSoP framework, we will consider whether any consolidation in the legal / regulatory framework may be required to make the requirements clearer

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and more transparent for all parties. We would welcome any stakeholder views on that at this stage.

- 3.34. With that in mind, **we will explore the introduction of a strengthened GSoP framework that expands to cover all network companies, adds more ambitious milestones, and increases current penalty values.**

Reporting

- 3.35. We agree that enforceability and compliance reporting are integral to ensure GSoPs are fit for purpose. We also agree that external mechanisms, such as a yearly audit against GSoP compliance, or public reporting of GSoP compliance performance, would help enable this. For example, public performance reporting, published on the Ofgem website, could act as a reputational incentive to ensure transparency and facilitate effective competition. As an example, these reports could possibly include data metrics such as the volume of GSoPs triggered, the % of GSoPs paid out when triggered, length of delays against milestones along the customer journey, and % of connection dates met relative to offer dates.
- 3.36. Public reporting requirements currently exist under the Major Connections Incentive (MCI) in ED2. Specifically, DNOs are required to publish performance reports against defined measures. These include the MCCSS and the Major Connections Annual Report (MCAR) which assess customer service and timeliness of major connections. However, these reports do not cover GSoPs and are often difficult to locate on DNO websites. At transmission level, reporting is limited: for example, NESO's Timely Connection Report³⁸ discusses offer provision milestones rather than delivery of connections. Overall, public reporting for both distribution and transmission connections lacks consistency, transparency, and accessibility across network company websites.
- 3.37. **With that in mind, we will explore developing mechanisms to ensure greater visibility of GSoP compliance, enforcement of GSoPs, ie, public reporting.** We are keen to hear from stakeholders what information should be published and at what frequency.

Financial instrument - liquidated damages (LDs)

- 3.38. As noted, provisions for LDs exist in TO construction agreements but respondents stated that they are predominantly set to 0. We are unsure as to the reasons behind this – we would like to hear stakeholder views as to why they are not agreed for inclusion within construction agreements more frequently.
- 3.39. LDs, when provided for in contracts, can act to compensate customers for a pre-specified % financial loss incurred as a result of breach of contract, in this case

³⁸ See here - [Timely Connections Report Apr-Sept 2025](#)

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missed connection dates due to delays within network companies' control. There are examples of LDs being used as standard in connection contracts in other international areas.

- 3.40. They can take many forms of design. The payments could be triggered by certain missed project milestones, or by tying accountability to specific phases. There could be a period to allow for minor delays, eg, up to 30 days, and payment value could escalate incrementally for delays occurring after this period. LDs could also be tied with the types of connection dates offered by network companies, eg, 'conservative connection date with agreed LDs' or 'ambitious connection with no LDs'. There may also be the need for an arbitration process to ensure impartial and fair resolution of disputes.
- 3.41. **We intend to explore further the merits of liquidated damages in contracts between the network company and the customer, to understand their potential for addressing connection delays.** We would like to hear views from stakeholders whether LDs should be introduced as standard, and how they can be provided for in a proportionate manner.
- 3.42. We acknowledge that the inclusion of LDs carries significant risk and potential consequences. We recognise that LDs must be set at a proportionate level, and not introduce disproportionate monetary risk on network companies. Further considerations include ensuring network companies are not being penalised for factors outside of their control, or being penalised twice should both LDs and increased GSoPs-mandated payments be introduced. There must also be consideration around interactions with price control incentives.
- 3.43. There is also risk to connecting customers. Network companies may manage financial risk by passing costs onto customers. Rising costs could raise barriers to connections and prevent projects from progressing. Networks may also take longer to generate offers due to necessary contract management practices, and be less ambitious with connection dates offered to combat the increased level of risk (this would be counter to the policy intent of Theme 4).

Decisions and proposals

DECISION 3.1. We will explore the introduction of a strengthened GSoP framework that may expand to cover all network companies, add more ambitious milestones, and / or increase current penalty values.

DECISION 3.2. We will explore developing mechanisms to ensure greater visibility of compliance of GSoPs, ie, public reporting.

PROPOSAL 3.1. We intend to further explore the merits of liquidated damages in contracts between the network companies and the customer.

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**New questions**

Q3.1. Do you agree with Decision 3.1 to introduce a strengthened GSoP framework targeting connection dates? Do you have any views on specific design points, eg, how should the value be set, should it be tailored to different customer types, what milestones should they be set against etc.?

Q3.2. Do you agree with Decision 3.2 to develop mechanisms to improve the transparency of GSoPs compliance performance?

Q3.3. Do you agree with Proposal 3.1 to explore further the introduction of liquidated damages as standard into connection contracts? Why do you consider liquidated damages are not currently inserted into contracts between the customer and the network company?

Anything else:

Q3.4. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Next steps

- 3.44. We will progress work on scoping out the feasibility of all three work streams (GSoPs, GSoP compliance reporting and LDs) immediately, in collaboration with stakeholders, and in parallel with the further consultation we are undertaking as part of this process. We then expect to formally consult further once we have a set of more developed proposals in the near future. We note that any licence changes remain subject to the relevant statutory consultation processes.

Theme 4: Quality of connection offers and associated documentation

Problem Statement

- 4.1. The regulatory framework generally focusses on the timeliness within which offers must be provided by network companies and NESO, but does not set out clear requirements on the quality of the offer and the information provided.

Goal

- 4.2. A regulatory framework that drives the creation of high-quality offers and associated documents/information provided, which are clear, transparent and detailed enough to provide certainty to the customers and investors.

Summary of issues we identified in the consultation

- 4.3. We discussed how the current regulatory emphasis on the timeliness of connection quotes and offers can risk leading to unintended consequences, including reduced quality and accuracy. We recognised that network companies may prioritise meeting deadlines over producing robust, well-considered offers, sometimes resulting in revisions or significant changes later. This pressure can also divert resources from other critical project delivery tasks, especially as application volumes and complexity increase.
- 4.4. In parallel, connecting customers often face challenges due to insufficient or unclear information received in offers. Key factors influencing connection dates are not always transparent, and offers may not accurately reflect potential delays, network reinforcement needs, or curtailment risks. Miscommunication between distribution and transmission timelines can create unrealistic expectations. Additionally, there is a lack of clarity around non-firm connections and capacity limitations, and updates to offers are sometimes poorly communicated, impacting customer confidence and ability to plan effectively.

Stakeholder views

- 4.5. This section summarises the responses we received to each of the questions in the consultation in turn.

Question 4a: The issues

Do you agree with the issues we have set out under Theme 4 - Quality of connection offers and associated documentation? Are there any other issues under this theme that we should consider or be aware of?

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- 4.6. Stakeholders generally agreed with the issues we set out. They highlighted that the main challenges are the lack of transparency and standardisation of offers between DNOs, as well as across transmission and distribution. Additionally, they noted that offers can be inaccurate and incomplete as they lack information around both technical specifications and financial uncertainties. Stakeholders believed that offers do not sufficiently elaborate on potentially significant changes that may materialise, for example, regarding cost changes that may occur further in the process.
- 4.7. Network companies presented alternative views stating that the quality of offers provided is generally as high as the regulatory timeframes allow. They also disagreed with the scale of the issue, citing high overall customer satisfaction levels reported. DNOs frequently pointed out that RII0-ED2 price control incentives, particularly the MCI, already incentivises provision of quality offers.
- 4.8. The majority of respondents generally shared the view that the trade-off between timeliness and quality is the root cause of many issues related to the quality of offers. A few stakeholders noted that many developers would be open to the regulatory framework allowing connection offers to take longer, within reason, if the offers could provide a higher degree of certainty.
- 4.9. There was a call for change of approach – many customers considered that instead of focusing solely on outputs, offers should explain the wider network constraints, as well as the methodology and assumptions used to produce estimates. Respondents highlighted that transparency and availability of data is key for customers to be able to make informed decisions at offer stage.
- 4.10. Simultaneously, however, several stakeholders noted that offers tend to be lengthy and contain information not relevant to their projects. They thought offers should be more focused and concise.
- 4.11. Another common theme was the need to maintain consistent, high-quality information across transmission and distribution. Respondents noted that transmission offers often lack the detail distribution offers have and this can negatively impact distribution customers subject to the Transmission Impact Assessment process. These stakeholders considered it key, therefore, that transmission and distribution offers converge in the type and quality of information they contain.
- 4.12. Multiple respondents stated that more frequent and efficient communication surrounding offer provision would help boost investor confidence and aid decision-making processes at early stages of the customer journey. For example, distribution customers indicated that while NESO uses its online portal for transmission offer engagement, DNOs generally rely on e-mails making the process more cumbersome. Customers also noted that they felt network companies should engage with them to re-evaluate offers when other applicants drop out, and inform them of available options.

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- 4.13. Additional issues pointed out and not explicitly acknowledged in the original consultation included occasional technical errors in offers, and the lack of a standardised offer template used across network companies which can lead to customer confusion.

Question 4b: Offer completeness and quality: principles-based condition**Do you have any views on Proposal 4a? Do you have any views on specific wording that would achieve the intended outcome?**

Proposal 4a. Principles-based licence condition on DNOs, TOs and the NESO on the completeness / quality of the offer and supporting documentation provided to customers in a timely manner, both at the initial offer stage and at subsequent offer update events.

- 4.14. Similarly to other themes, the majority of stakeholders did not support principles-based licence conditions stating that they would not be effective in achieving the objectives of Theme 4. Respondents explained this is due to the ambiguity of such obligations and subjectivity in interpretation. They stated that offers currently lack clarity, transparency and consistency across both network companies and transmission/distribution, and unspecific obligations are likely to further exacerbate these issues. Clear and specific standards, due to their more enforceable nature, were considered more likely to result in improvement in clarity and completeness of offers.
- 4.15. The developer community supported minimum standards as a more adequate tool to specifically guide licensees, specifically at distribution level. Networks, however, cautioned that balance must be struck between requiring too much and insufficient detail in the offer.
- 4.16. Those who did support Proposal 4a believed principles-based licence conditions would need to be introduced in combination with another regulatory lever. Several respondents highlighted that clear guidance is crucial in this area and there may be a need for an additional document introducing a common set of criteria to support new licence obligations and ensure network companies are clear what is expected of them.
- 4.17. Others supported a combination of Proposal 4a and 4b, ie, a principles-based licence condition mandating provision of quality and complete offers, with prescriptive licence conditions setting a minimum timeframe.

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**Question 4c: Offer completeness and quality: minimum standards**

Do you have any views on Proposal 4b (minimum standards / SLAs on the completeness / quality of the offer and supporting documentation)? Do you have any views on specific standards that could be introduced and how they would work in practice?

Proposal 4b. Minimum standards licence condition and/or SLAs on DNOs, TOs and the NESO on the completeness / quality of the offer and supporting documentation. Minimum standards could be accompanied by incentive or penalty mechanisms to further drive compliance.

- 4.18. Respondents generally preferred Proposal 4b to 4a, stating that clear, minimum standards licence conditions would more effectively address issues relating to the completeness and quality of connection offers than a principles-based requirement. Network companies also expressed preference for this option arguing that it is easier to demonstrate compliance with prescriptive regulatory obligations.
- 4.19. It was noted, however, that a balance between too much and not enough detail must be struck. Some DNOs supported strengthening and expanding the MCCSS in ED3 to include provisions around offer quality as a way of incentivising the same behaviours, arguing that this is a more straightforward and less costly way forward.
- 4.20. More specifically, multiple respondents supported the proposal to introduce an offer template enacted through a licence condition mandating that it includes a common set of criteria / metrics to clearly outline expectations on networks.
- 4.21. Concerns, however, were expressed in relation to the need for network companies to compromise on offer quality in order to issue them quickly and meet existing regulations including GSoPs. A few stakeholders proposed minimum timeframes for offer provision as a remedy, ie, to ensure network companies have the time they need to formulate quality offers.
- 4.22. Network companies who opposed Proposal 4b stated that too much detail in the offer can lead to adverse outcomes, as detailed technical information and assumptions may be shared with competitors and impact on competition in the market as a result. Additionally, they pointed out that needs differ between customer types and it would be challenging to design a one-size-fits-all set of rules for all offer types.

Question 4d: High quality offer

What do you consider would constitute a 'high quality offer'?

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- 4.23. Respondents provided a view on what constitutes a good quality offer. Elements cited included:

Key technical information:

- i. state of the network, eg, transmission capacity constraints information
- ii. data and assumptions behind connection dates
- iii. type of equipment used
- iv. greater transparency around why firm or non-firm connections are offered
- v. expected curtailment levels
- vi. uncertainties and likely changes

Financial information and prognosis:

- i. greater transparency around costs – financial breakdowns are considered poor at transmission level
- ii. predicted cost changes/increases – costs tend to significantly increase over time with no prior notice nor justification
- iii. benchmarked cost comparisons on asset and work costs (eg, per unit price per kilometer of cable or £/MVA for transformers)

Operational:

- i. communication of clear project milestones

- 4.24. Network companies noted that these standards should be tailored to different customer journeys as individual projects may vary significantly. Some argued that because of this, new universal obligations would be challenging to apply, and the price controls' MCCSS metric would remain more effective in driving improvements in this area.

Question 4e: Additional comments

Is there anything else regarding Theme 4 - Quality of connection offers and associated documentation that you consider we have missed?

- 4.25. No additional substantive points were raised.

Our response and analysis

- 4.26. In light of all responses and the issues raised by connections customers, we believe that the licence should make more specific provisions in relation to information included in the offers, as well as the quality and nature of dialogue between regulated party and customer surrounding offer provision.

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**Timeliness vs quality**

- 4.27. We note the continuous efforts of network companies to issue quality offers that suit diverse customer needs. We are conscious that strict licence timeframes may at times prove limiting, and network companies have been putting in effort to keep customer satisfaction levels high in spite of timeliness limitations.
- 4.28. While price control incentives and the MCCSS at distribution generally incentivise engagement and offer provision within licence-defined timescales, these incentives do not set targeted, customer-specific minimum standards that are universal across market segments. Current incentives also do not specifically target clarity, consistency and robustness of information in connection offers. Presently, offer quality differs between network companies. We consider that more prescriptive regulatory obligations would support regulated parties in clarifying what constitutes a quality offer and introduce a standardised way of presenting information to customers.

Transparency of costs and financial assumptions

- 4.29. The offer should set out costs and terms clearly and efficiently to increase investor confidence and allow for adequate planning and risk analysis. While we recognise that cost changes and technical adjustments cannot be predicted with complete accuracy, greater transparency on cost categories and a more robust process for estimating cost increases should be provided at a minimum. This will enable financial risk mitigation measures to be implemented early, rather than late in the project cycle.
- 4.30. TOs should adopt a standardised approach to cost breakdowns, clearly distinguishing contestable and non-contestable elements, and provide justification for any changes. Published connection cost examples should be regularly reviewed to reflect market conditions.
- 4.31. Addressing material errors in contract offers is essential to ensure accuracy and reliability throughout the process.

Communication of technical solutions

- 4.32. We have received evidence from connection customers informing us of the lack of transparency surrounding the type of connection offered to them. Clarity of solutions suitable for each project is crucial for customer decision-making processes. For this reason, it is key that customers understand the options available to them, specifically where non-firm or ramped connections apply. It is vital that customers understand the cost and curtailment implications, as well as why a firm connection may not be the most optimal solution, either during the offer stage or later in the process when other options become available to expedite the connection date.

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- 4.33. We consider that a degree of optionality should also apply so that a customer may make an informed choice on whether to opt for a firm or non-firm connection. It is critical that the offer provides the connecting customer clarity on the implications for their connection once energised, ie, how the capacity may be reduced or increased. Network companies should establish at the outset how flexible a customer can be in their requests and fully explain the connection date and cost implications.
- 4.34. This proposal aims to give customers greater clarity on their options during the offer stage, with the specific goal of improving transparency and building confidence in the offers provided. Theme 5 highlights the related benefits of this approach, including the potential for earlier, more ambitious connection dates.
- 4.35. N.B. – In line with the message conveyed in the ED3 SSMC, while clarity of options and assumptions is essential, and customers should have the freedom to voluntarily agree to a permanent or temporary period of non-firm access until the necessary network build has been constructed if that were possible, network companies should ensure that flexibility is not used as a substitute for necessary long-term network investment.

Required regulatory modifications and implications

- 4.36. We agree that prescriptive licence conditions will be more effective than principles-based conditions in ensuring clarity of obligations. This will facilitate an effective discharge of obligations for networks and provide customers with assurances of minimum standards they can expect regardless of the network company. We expect this will result in a more consistent and transparent customer service. We consider that new licence obligations should prescribe minimum offer standards, ie, the type of information that should be included in the offer, or that should be communicated to customers alongside quotation provision.
- 4.37. It is vital that any new obligations are specific, yet achievable and proportionate. Our intention is, to the extent possible, to avoid delays and cost increases resulting from the application of stricter minimum requirements on networks in this area. New obligations relating to what is to be included in all connection offers must ensure that time and costs of producing such offers do not increase significantly, specifically when introduced in conjunction with new obligations elsewhere in the regulatory framework. Efforts to find innovative, cost-saving solutions should go hand in hand with upcoming regulatory changes.
- 4.38. It is also key that adherence to new minimum requirements and provision of this more detailed information do not delay connection offers. We note that network companies may be limited by licence timeframes for offer provision which will prove challenging when issuing more thorough offers. This will likely be linked to more detailed studies. We believe a balance must be struck between cost and

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time increases and providing customers with reasonable confidence in the quality and robustness of the connection.

- 4.39. Having said that, the batched TMO4+ process allows for a maximum 7.5-month offer provision timeframe. With the move to a batched process, the emphasis will no longer be solely on meeting the previous 3-month and 65-day deadlines for provision of an offer.³⁹ Timeliness still matters, but we also want to ensure regulated parties deliver offers that are clear, detailed, and consistent—giving customers the confidence to make informed choices.
- 4.40. For the reasons set out in the above paragraphs, we believe that any new licence obligation should be accompanied by a guidance document, produced collaboratively by industry participants, both at transmission and distribution level. This is to ensure clarity, consistency and proportionality of any new obligations surrounding offer quality. This guidance would also take into account different customer types and provide examples and templates of quality offers issued.
- 4.41. To account for diverse customer needs and an evolving landscape, prescriptive licence conditions could be supported by a principles-based licence condition that sets overarching objectives in relation to transparency of offers and customer engagement at offer stage. This objective interlinks with the availability and transparency of data discussed in Theme 1, as well as communication and engagement in Theme 2.

Decisions and proposals

Decision 4.1

- 4.42. **We will explore the introduction of minimum standards relating to connection offers through prescriptive licence conditions. These standards will set out the minimum information to be included in or with the offer.**
- 4.43. As the licence may not be the suitable avenue to set out detailed processes surrounding offer provision, a separate guidance document could accompany these prescriptive licence obligations. Specific minimum standards could be contained either in the licence, or in the associated guidance document that the licence will mandate the licensees to develop and follow.
- 4.44. We are keen to hear from stakeholders on what aspects of an offer should be prescribed. As a minimum, we propose that this should include a combination of technical and financial information, including, but not limited to:
- i. local network context, eg, local capacity and constraints

³⁹ As prescribed by Standard Licence Condition C8 of the Electricity System Operator licence and Standard Licence Condition 12 of the Electricity Distribution Licence.

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- ii. explanation of terms and types of connection options available to the customer, alongside expected curtailment the customer is likely to experience - clarity of connection types and associated terminology is particularly important when customers do not have a full understanding of the technical terms specified in the offer
- iii. additionally, to help customers assess cost implications early in the process, we propose inclusion of a breakdown of costs, including prognosed cost fluctuations where final costs cannot be estimated with full confidence. This would include a description of dependencies and factors likely to affect the project lifecycle, and associated costs that would result.

Decision 4.2

- 4.45. **We will explore the introduction of a principles-based licence condition focused on clarity of communication and engagement in relation to offers.** This will ensure that the overarching objectives of the licence are clear and that networks meet required standards. Principles-based conditions act as a safety net by encouraging behaviour that leads to improved quality of service and better communication. In addition, by setting out general principles and defining what good looks like, these conditions provide flexibility for networks to implement new and innovative solutions.
- 4.46. N.B. – This proposal is separate from the principles-based licence condition described in Theme 2 and will focus specifically on the offer provision stage in the customer journey.

Proposal 4.1

- 4.47. **We have proposed that minimum standards are supported by a price control metric** – this was discussed in the ED3 SSMC document and stakeholders were invited to provide their response.⁴⁰

DECISION 4.1. We will explore the introduction of prescriptive licence conditions introducing minimum standards on offer contents.

DECISION 4.2. We will explore the introduction of principles-based licence conditions to ensure clear communication and engagement around offers.

PROPOSAL 4.1. We have also proposed that minimum standards are supported by a price control metric in ED3.

⁴⁰ The consultation closed on 3 December 2025.

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**New Questions**

Q4.1. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Next steps

- 4.48. We will progress the design and development of both the prescriptive ‘minimum standards’ licence conditions and principles-based licence conditions immediately and in parallel with the further consultation we are undertaking as part of this process. We then expect to consult further once we have a set of more developed proposals in the near future. We note that any licence changes remain subject to the relevant statutory consultation processes.
- 4.49. We require network companies groups to produce guidance regarding minimum requirements for offer content for network companies to follow when issuing offers to customers. We anticipate ENA and NESO will have a role in leading industry working groups to agree on distribution and transmission offer standards and processes. We expect ENA and NESO to collaborate to align proposals to avoid divergence between distribution and transmission offers. Progress in this space will be reported to the Connections Delivery Board.
- 4.50. The ED3 Business Plan Guidance and the Sector-Specific Methodology Decision (SSMD) will be published in early 2026, specifying further direction of travel with regards to the financial rewards and modifications to the MCCSS.

Theme 5: Ambition of connection offers

Problem Statement

- 5.1. We see a risk that, should requirements on DNOs, TOs and NESO to meet connection dates in connection agreements be strengthened (see Theme 3), network companies may be naturally incentivised to self-preserve by offering conservative connection dates.

Goal

- 5.2. A regulatory framework that suitably incentivises / requires network companies to offer customers ambitious but achievable connection dates, and, where possible, innovative connection offers should a viable connection date be unachievable.

Summary of issues we identified in the consultation

- 5.3. The proposals discussed under Theme 3 – “Requirement on networks to meet customer connection dates” may result in strengthened obligations on network companies to meet connection dates in connection agreements. This could result in networks being penalised if, due to their own actions or behaviours, customers experience delays or terminated connections.
- 5.4. We identified that this may cause networks to shift their mindset to offer more conservative, later connection dates, as these will be easier to meet.

Stakeholder views

- 5.5. This section summarises the responses we received to each of the questions in the consultation in turn.

Question 5a: The issues

Do you agree with the issues we have set out under Theme 5 - Ambition of connection offers? Are there any other issues under this theme that we should consider or be aware of?

- 5.6. While not all respondents addressed Theme 5 directly, the majority of those who did agreed with the issues set out.
- 5.7. Stakeholders recognised the risk that introducing incentives on the timeliness of offers could lead to a perverse incentive where network companies may default to more conservative connection dates to protect against the risk of penalties.

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- 5.8. Several respondents stated that the current NESO, TO and DNO licence wording – ie, “time being of the essence” – lacks clarity and does not focus on ambition.
- 5.9. Some respondents were supportive of requiring network companies to offer the earliest achievable connection dates, but emphasised the need for this to be realistic and reliable based on an understanding of technical and regulatory constraints, to avoid costly delays later in project timelines.
- 5.10. Respondents also highlighted that if networks were to offer conservative connection dates, this could hinder the delivery of network upgrades needed for CP2030 and, therefore, addressing these ambition issues will be crucial. They advised that proposals to do so should be aligned with both CP2030 and the Strategic Spatial Energy Plan to ensure more efficient connections aligned with strategic plans.
- 5.11. Respondents also identified another issue in instances when network companies revise offers, issuing new dates with little information provided to developers as to why this new date has been chosen or whether a more ambitious date was given any consideration. They stated that, currently, there is no obligation for network companies to address developers concerns regarding the ambition or quality of a connection offer.
- 5.12. Other stakeholders acknowledged the theoretical concerns outlined but felt that existing obligations were adequate to counter this risk and did not expect the issue of a perverse incentive to materialise. Some also expressed concern that imposing a stricter licence condition could increase the administrative burden on network companies without impactful customer benefit.

Question 5b: Connection date offer: principles-based condition**Do you have any views on Proposal 5a? Do you have any views on specific wording that would achieve the intended outcome?**

Proposal 5a. A strengthened principles-based licence condition that requires DNOs, TOs and the NESO to offer the earliest achievable connection date to the customer, and to provide revised offers in a timely manner if it later became possible to connect the customer more quickly.

- 5.13. The majority of respondents were supportive of a principles-based licence condition to strengthen regulatory oversight of connection date ambition, service quality, and communication standards. Respondents called for clearer licence wording to prevent risk-averse behaviour and promote timely connections. They agreed that introducing new terminology, such as “earliest achievable connection date”, would provide networks with sufficient flexibility to assess the ambition of their connection offers.

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- 5.14. Several respondents proposed alternative wording to enhance the clarity and transparency of the licence, such as requiring network companies to “use best endeavours to provide an offer for the lowest cost based on the customer’s technical requirements and requested connection date”. Some respondents proposed that we could take a more quantitative approach and consider linking a new requirement specifically to the need to minimise the difference between the connection date requested by the developer, and date provided by the network.
- 5.15. There was also strong support for enabling post-offer improvements and offering flexible connections where earlier dates become feasible. Respondents noted that this approach would incentivise more ambitious connection dates and allow projects to connect sooner if they are ready and able. Responses advocated for greater use of flexible connections for both generation and demand projects.
- 5.16. A number of respondents raised the importance of transparency and clarity of communication between NESO, DNOs and TOs, as well as between network companies and customers, to ensure the efficient delivery of connections. They also called for requiring clear lines of communication within network companies between personnel involved across the connections process (eg, site and delivery teams) to facilitate the delivery of ambitious connection dates, or the provision of revised offers.
- 5.17. One respondent stated that the implementation of Proposal 5a, requiring network companies to provide the earliest possible connection date based on available information at the time, would need to be accompanied by clear guidance on what constitutes as relevant information for a connection offer, to inform customer understanding and enable customers to challenge whether the date they have received is in fact the earliest available date.
- 5.18. However, a significant number of responses expressed reservations about Proposal 5a, highlighting a preference among some customers for reliable and stable (ie, less “ambitious”) connection dates aligned with their development timelines. Several respondents raised concerns around the practical implementation of the licence condition, particularly the risk of networks offering earlier connection dates that may not suit customer project timelines or business plans.
- 5.19. Many stakeholders emphasised the importance of realistic, rather than optimistic, connection dates, especially for larger projects with complex planning requirements that may not consider ambitious dates the highest priority factor. To address this, an ‘opt-in’ mechanism was proposed (also raised under Theme 4), where network companies can make alternative offers to customers where delays or advancements mean a change in connection date. This would allow customers to choose whether they wish to pursue earlier connection dates, such as, opting into an earlier connection date with a flexible connection in the event of a delay.

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- 5.20. Several respondents questioned the effectiveness of a principles-based licence condition, suggesting that a financial incentive mechanism would be more appropriate to drive the desired behaviours. One stakeholder argued that networks should be encouraged to innovate and experiment with processes to improve efficiency, rather than being forced to exert resources and ultimately reduce the quality of connections. Additionally, it was suggested that SLAs and minimum standard licence conditions could offer a more robust framework for ensuring consistent and customer-focused outcomes.
- 5.21. The potential for unintended consequences emerged as a recurring theme. Respondents cautioned that prioritising the “earliest achievable date” could undermine offer quality, cost-effectiveness, coordination, and system efficiency. There were concerns that this emphasis might lead networks to deprioritise reasonableness and economic viability, resulting in increased costs for customers and diminished connection quality. The perception that delays would not be tolerated may also lead to inefficiency and operational errors.
- 5.22. Network companies generally disagreed with the proposal, asserting that they already strive to provide ambitious connection dates and that the proposed licence condition would offer limited additional value. They pointed to external factors, such as third-party delays, that can significantly influence connection timelines.
- 5.23. Finally, multiple stakeholders stressed that connection dates should be grounded in technical assessments of capacity and availability. One respondent recommended that DNOs conduct regular reviews of connection schedules to identify opportunities for acceleration, ensuring that earlier dates are offered where feasible.

Question 5c: Additional comments

Is there anything else regarding Theme 5 - Ambition of connection offers that you consider we have missed?

- 5.24. To further drive ambition and accountability, several respondents recommended the introduction of a comparative league table to benchmark network company performance when it comes to ambition. Additionally, an independent external audit was proposed to assess whether networks are demonstrating the right behaviours. Concerns were raised regarding TOs being overly optimistic and DNOs being overly conservative in their connection date estimates.
- 5.25. Respondents also emphasised the need for continuous stakeholder engagement and support of innovative solutions to bring dates forward. Additionally, they recommended that the ambition of connection offers should be considered alongside emerging obligations on licensees regarding meeting strategic energy

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plans and decarbonisation strategies, for example the ambition required in offers to meet government’s CP2030 targets.⁴¹

- 5.26. Stakeholders touched on the need for clarity of information and suggested that, should a customer’s requested date be unachievable, this should be highlighted to customers as soon as possible, with a clear justification be provided for the connection date subsequently offered (see Theme 4), or an interim connection offered (eg, at a lower capacity) to offset the risk identified in this theme.

Our response

- 5.27. Our overarching aim for Themes 1-5 of this review is for the proposals to work collectively to improve the services provided by networks, including improved communication between networks and customers, better sharing of information, and the setting of appropriate expectations and timelines to improve the customer connections journey.
- 5.28. We agree that the connection offers being provided to customers should strive to be more ambitious, however that ambition must be balanced with achievability.
- 5.29. We are proposing through Theme 3 of the consultation to incentivise networks to meet timeframes for delivery. We recognise risks with this proposal that networks may naturally offer less ambitious dates to protect themselves against penalties. We are keen to explore the ways in which proposals for the ambition of connection offers can work in tandem with the proposal set out in Theme 3.
- 5.30. We agree that a principles-based license condition is an effective method to require ambition, without being overly prescriptive and limiting given the variance in individual project needs and external circumstances.
- 5.31. However, we also recognise the risk of subjective interpretation of a principles-based licence condition. We are therefore looking to explore additional proposals to place a more prescriptive requirement on the ambition of connection offers.
- 5.32. One option we would like to explore is the concept of an ‘energisation window’, whereby network companies could provide a ‘front date’ to connection customers that acts as an ambitious target, against which they could possibly be incentivised, and an ‘end date’ that acts as a backstop date (following a deadband period), which is treated as a minimum standard and potentially subject to penalties set out in Theme 3. These incentives / penalties could be financial or reputational.
- 5.33. We note the complexity of this proposal and that significant policy detail needs worked through to ensure it is workable and delivers the intended outcomes. At this stage we would like to consult industry on this as a concept and would

⁴¹ Note, we recently published guidance in November 2025 on the need for ambition in offers (joint with government) - [Connections Reform: Guidance on Offer Ambition for Clean Power 2030 | Ofgem](#)

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particularly like to understand whether anything similar to this is currently being offered to customers by network companies. Similarly, we want to explore how the ambitious front end target date should be determined to ensure that it is sufficiently ambitious, and who the scrutinising party that determine this date should be. Other questions relate to the length of time that would be appropriate between the front and backstop dates, and whether this should be standardised across transmission and distribution, across customer and/or connection type, or tailored to individual projects.

- 5.34. Finally, we want to understand how this could be delivered in practice in the regulatory framework in future. We stress that there are currently no proposals of this nature for inclusion within RIIO-T3 or ED3. We note that the RIIO-T3 Final Determinations published last week instead tackles the ambition offer ambition issue by providing for the possibility of an independent audit/review of some or all TO connection dates offered through connections reform to assess, amongst other factors, the ambition of connection dates being offered by the TO, to ensure they are not lacking in ambition in response to the new financial incentive on connections delivery.
- 5.35. We consider the introduction of an optional ‘opt-in’ mechanism could be an effective method of introducing optionality whilst considering the different needs of connecting customers. Customers that opt-in to receiving earlier connection offers, including flexible options, could benefit from faster connections if they became a possibility, and not at the expense of other projects in the queue. This would provide additional benefits to those outlined under Theme 4 relating to transparency for customers on the different connection options, as it would also facilitate the delivery of more ambitious dates without imposing earlier timeframes on all customers.
- 5.36. Making it an optional mechanism protects developers of larger projects who require reliable and stable connection dates from being given an earlier connection date they do not want and cannot meet.
- 5.37. We are aware of the risk of over-incentivising short-term flexible solutions at the expense of long-term network reinforcement and strategic investment. This trade-off is explored in greater detail in the recently published ED3 SSMC, which highlights the need for balanced incentives that support both immediate system needs, and long-term network reinforcement and expansion.
- 5.38. We are minded not to introduce obligations for ambition in other areas of the connections process (eg, ambition for the provision of offers) in light of proposals under Theme 4 that, instead, focus on the quality of offers and supporting information for connecting customers.

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Decisions and proposals

Decisions

5.39. We will progress the proposal to introduce a new obligation on network companies to offer ambitious yet achievable connection dates, through a strengthened principles-based licence condition.

5.40. Draft examples of licence wording⁴² could include:

- *“earliest date reasonably achievable, taking into account the date requested by the connecting customer”*

This wording recognises that not all developers want the earliest available/fastest connection dates, therefore accounting for differences in customer requirements.

- *“ensure that connection offers are ambitious in terms of earliest feasible delivery, and are achievable based on available resources, system constraints and customer requirements”*

This wording offers some protection for network companies by taking into account factors that may be outside of their control (such as third-party delays) that would impact the delivery of ambitious connection dates.

- *“ensure connection offers are ambitious, achievable, and, where ambitious timelines are not viable, offer reasonable alternatives to facilitate timely access to the electricity network”*

This wording introduces an expectation on networks, where ambitious timelines are not able to be met, to offer other solutions to facilitate timely connections.

5.41. We want to ensure the licence wording encourages ambitious and achievable connection dates without leaving excessive room for interpretation. We also acknowledge the need for the condition to protect against networks being penalised for delays outside of their control, and are considering how to manage occasions where this may be the case. We are keen to hear from stakeholders any proposals for the wording of this licence condition.

⁴² The exact wording of a new licence obligation will be subject to a statutory consultation process at a later date.

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Proposals

Proposal 5.1.

5.42. We intend to explore further the merits of introducing an ‘energisation window’ offered by network companies to connections customers.

Proposal 5.2.

5.43. We are exploring the proposal to create an ‘opt-in’ mechanism for earlier connection dates.

5.44. It is important to note that we do not see these proposals as mutually exclusive, and, in fact, anticipate them working efficiently in conjunction with one another. These proposals will also be designed to work effectively with those proposed under other themes in this review.

DECISION 5.1. We will explore the introduction of a strengthened principles-based licence condition to introduce a new obligation on network companies to offer ambitious yet achievable connection dates.

PROPOSAL 5.1. We intend to further explore the merits of introducing an ‘energisation window’ with a start date, acting as an ambitious target, and an end date, acting as a backstop.

PROPOSAL 5.2. We are proposing the creation of an ‘opt-in’ mechanism for earlier connection dates, to provide optionality for customers to accept earlier connection dates if one becomes available.

New questions

Q5.1. Do you have any views on Proposal 5.1, ie, the concept of an ‘energisation window’ with a start date, acting as an ambitious target, and an end date, acting as a backstop?

Q5.2. Do you have any views on Proposal 5.2, ie, the concept of an ‘opt-in’ mechanism for earlier connection dates, to provide optionality for customers to accept earlier connection dates if one becomes available?

Anything else:

Q5.3. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Next steps

5.45. We will progress the design and development of the strengthened principles-based licence condition immediately and in parallel with the further consultation we are undertaking as part of this process. We then expect to consult further once

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we have a set of more developed proposals in the near future. We note that any licence changes remain subject to the relevant statutory consultation processes.

- 5.46. Additionally, we will engage with industry through working groups to explore the design of the new proposals for an ‘energisation window’ and ‘opt in’ mechanism. Reviewing responses to the consultation questions will be the first step of this process so that we can begin to flesh-out these proposals in more detail.
- 5.47. Finally, both the Business Plan Guidance and SSMD for ED3 will be published in early 2026 outlining the planned course of action for the next price control period and our proposals will be developed in line with this.

Theme 6 – Minor / Smaller Connections

Problem Statement

- 6.1. Connection requests at the lower voltages ('smaller connections') are increasing rapidly, with energy consumers adopting low-carbon technology (LCT) as part of a net zero transition and to reduce their energy costs. These levels will continue to grow at pace as electrification demand increases.
- 6.2. Connection customers and other network users must be able to connect promptly, without waiting for this capacity to become available and with consistent and seamless processes across DNOs. However, technical and service standard issues are sometimes preventing smaller connections customers from receiving their required connections in a timely manner.

Goal

- 6.3. Requirements on regulated parties are uniform, clear and unambiguous, ensure smaller connections customers receive a prompt and consistent high standard of service, and ensures smaller connections are proactively made and facilitated to a high standard in a timely manner.

Summary of issues we identified in the consultation

- 6.4. We highlighted how delays and inconsistencies in connecting LCTs such as heat pumps, EV chargers, and rooftop solar risk undermining decarbonisation efforts and customer confidence. While DNOs do not install these technologies directly, they are responsible for enabling works such as load-checks, unlooping, fuse upgrades, and three-phase supply upgrades. DNO approaches and policies vary widely, creating confusion. Export limits under G98/G99 add complexity, while low notification rates leave DNOs unaware of significant demand. Network capacity constraints further block projects, even for self-consumption.

Stakeholder views

- 6.5. This section summarises the responses we received to each of the questions in the consultation in turn.

Question 6a: The issues

Do you agree with the issues we have identified? Are there any other issues under this theme that we should consider? Please provide data and evidence to support your views if possible.

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- 6.6. The responses to Theme 6 came from a diverse range of stakeholders, including industry bodies, consultancies, consumer representatives, trade associations, network companies, and individual companies.
- 6.7. Many respondents expressed clear recognition of the issues identified under Theme 6. There was strong consensus that delays to smaller connections are persistent yet, in many cases, likely avoidable.
- 6.8. Inconsistencies between DNOs were also widely acknowledged. Respondents noted disparities in approval criteria, fuse limits, and the use of load-limiting devices (LLDs), with some DNOs accepting LLDs while others do not. Several respondents raised concerns about inconsistent communication practices, including DNOs contacting customers directly without informing installers, and confusion caused by Connect Direct⁴³ emails sent to both parties (installer and customer).
- 6.9. A lack of transparency of information was also highlighted, with examples given such as unannounced changes to requirements placed on developers and installers, as well as unclear points of contact within DNOs.
- 6.10. On the issue of financial recourse, some respondents suggested that the priority should be getting the process right for customers. Concerns were raised that, under some proposed compensation mechanisms, it seemed that installers, not customers, would receive payments when delays or issues occur. They felt this could reduce the incentive for installers to keep customers informed.
- 6.11. Views on export limits were mixed. While several respondents agreed that the G98 process may be outdated and an unnecessarily low limit could be contributing to unnecessary delays, others emphasised the need to consider network impacts and ensure any changes to the limit are in the customer interest.
- 6.12. There was a broad agreement that low notification rates of connected assets are a significant issue. Respondents supported clearer guidance for installers on when and how to notify DNOs of new LCTs and for standardised industry wide processes to capture this information. These measures will help DNOs maintain accurate visibility of demand and generation on their networks, enabling better planning and ensuring safety during outages.

⁴³ Connect Direct is an online portal developed by Energy Networks Association that enables installers and customers to submit applications for LCT connections such as EV chargers, heat pumps and solar PV, and track their progress directly with the relevant DNO.

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**Question 6b: Stakeholder views on the specific proposals⁴⁴**

What are your views on our proposals designed to address these issues? Are there other proposals you consider would achieve the intended outcomes?

6.13. A significant majority of respondents either fully supported or partially supported the proposals, with some expressing partial opposition. No respondents fully opposed the proposals, and only a small number remained neutral.

Proposal 6a: Principles-based licence obligations for DNOs and/or guidance to define clear objectives and expectations for timelines and delays, AND/OR, set SLAs and/or minimum standards that DNOs are obliged to meet for minor connection requests.

6.14. There was a preference among respondents for SLAs and/or minimum standards over principles-based licence obligations. Respondents cited concerns that principles-based licence obligations can be vague, open to interpretation, and lack enforceability.

6.15. Those who supported SLAs and/or minimum standards emphasised that any such measures should be clearly measurable, proportionate, and sensitive to practical challenges such as DNOs ability to access third-party properties. Respondents also stressed the importance of balancing customer service expectations with cost efficiency.

6.16. Evidence was shared showing delays to connection activities, including issues such as extended completion times and variation in application response times.

6.17. Respondents included evidence from the DESNZ evaluation of the Boiler Upgrade Scheme (BUS), which found that 45% of heat pump installers viewed DNO approvals as the most significant limiting factor outside their control.

6.18. DNOs who responded to this question broadly acknowledged that there are examples of delays in smaller connections, although most described how delays were often caused by factors outside of the DNO's control, ie, third-party access, obtaining wayleaves and permits. Challenges were also highlighted such as the need for interim solutions due to access issues and delays caused by customers not being ready.

Proposal 6b: We proposed as a minimum to set obligations on DNOs to determine how best to align their processes to ensure high standards are set and consistent across the processes discussed in this theme, and where appropriate, meet the SLAs/minimum standards.

⁴⁴ While this document uses the term 'Smaller Connections' for consistency with the ED3 Sector Specific Methodology Consultation (SSMC) instead of 'Minor Connections', any references to proposals or responses from the original consultation retain the term 'Minor Connections' to accurately reflect the source material.

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- 6.19. This proposal received strong support, with majority of respondents in favour. Stakeholders agreed that DNOs standardising processes between themselves is essential to avoid “postcode lotteries” and improve customer experience.
- 6.20. However, some respondents highlighted the need for regional flexibility in implementation and cautioned against setting minimum standards at the current average as these would unlikely drive improvement.
- 6.21. Respondents also raised concerns about inconsistent user experience and poor communication. Specific inconsistencies were noted in digital platforms (eg, differing upload capabilities for installation designs) and fuse upgrade practices. For example, some DNOs introduced new technical or process requirements for installers, such as additional documentation or revised design standards, without providing clear guidance. In several cases, respondents noted that there was no obvious point of contact within the DNO to resolve queries, which led to delays in progressing installations.
- 6.22. Finally, several respondents reported delays in progressing connection applications where properties had black plastic or resin fuse cut-outs. These delays occurred because installers could not submit applications through Connect Direct where the system did not initially recognise these fuse types, requiring manual intervention by DNOs instead. Since the original consultation, ENA has updated Connect Direct’s functionality to include these fuse types, reducing the risk of similar delays.

Proposal 6c: Monitoring SLAs and/or minimum standards with compulsory reporting from the DNOs, AND/OR publishing the resulting data as aligned to SLAs and/or minimum standards if set.

- 6.23. Responses to this proposal were broadly supportive, with many agreeing in principle and others offering partial support. Those who were more cautious emphasised the importance of having agreed metrics and targets that account for factors outside DNO control.
- 6.24. Publishing performance data was well supported, with either Ofgem or the DNOs taking responsibility for publishing this information. Some respondents highlighted that reporting obligations should avoid imposing excessive costs on DNOs and should be designed to provide meaningful insights for customers and stakeholders.

Proposal 6d: We propose to consider whether the current arrangements for financial recourse are sufficient for minor connection customers, and if not, whether there is a need for a consumer body, or an improvement of what already exists for connection customers, to ensure minor connections are facilitated to a high standard and in a timely manner. This includes consideration of whether expanding / extending the GSOPs for minor connection customers would deliver better outcomes.

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- 6.25. Several responses discussed the need for a consumer body to support enforcement. Those in favour of a new body argued that an independent enforcement mechanism would strengthen accountability and ensure timely financial recourse when timelines or standards are not upheld. Alternatively, other respondents highlighted that existing consumer bodies already provide routes for redress and should be better publicised. They cautioned that creating a new consumer body would increase costs for consumers and recommended utilising current regulatory frameworks wherever possible.
- 6.26. Responses on expanding GSoPs were varied. Some felt current penalties were sufficient, while others believed they were not being adhered to in practice. There was also interest in exploring whether additional measures could strengthen compliance.

Proposal 6e: We propose to set an obligation on DNOs to review their policy towards the G98 limit, including increasing the current limit unless there is a justification of why uplift is not in the consumer interest, or could have unintended consequences for the network.

- 6.27. Responses to this proposal were generally supportive. Many agreed with increasing the G98 threshold for export, noting that this could reduce the volume of lengthy and complex G99 applications and increase the number of auto-approvals.
- 6.28. Some respondents suggested that increasing the G98 threshold could incentivise manufacturers to design higher powered LCTs that qualify for automatic approval, benefitting customers by bringing to market more efficient products that can be connected automatically. However, respondents noted that any such change to G98 would need to be carefully assessed to ensure it does not create unintended network risks by having generation connect without any additional safety or compliance checks.
- 6.29. Other respondents suggested reviewing the G99 Fast Track process for microgeneration as an alternative to reviewing the G98 limit. This approach would deliver similar outcomes but avoid safety concerns, because it still allows DNOs to carry out necessary checks and maintain some control over assets. Others noted any change to the G98 limit may require legislative change to enable it, ie, a modification to the Electricity Safety, Quality and Continuity Regulations (ESQCR) to ensure DNOs could safely manage voltage in their areas.

Proposal 6f: We propose to investigate how to strengthen the notification obligation on LCT installers, ie, where they must notify the DNOs of all new LCT connections.

- 6.30. This proposal received strong support. Stakeholders agreed that improving notification rates is essential for DNOs to improve their network visibility and

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planning. Suggestions included monitoring installer compliance through trade bodies or linking notification to Micro-Certification Scheme (MCS) approval.

- 6.31. Some respondents raised concerns about post-installation notification, which in some cases oblige installers to return to the property after the initial installation to confirm details or complete paperwork. Others noted that customers are often unaware that installers – not customers - are responsible for notifying DNOs of the new asset. This lack of awareness can lead to confusion when customers later try to register for export, as the DNO may not have record of installation. These issues can result in delays to export registration and, in some cases, prevent customers from accessing flexibility services.

Other issues and proposals raised

- 6.32. Several respondents suggested expanding the Broad Measure of Customer Satisfaction (BMCS) survey – a current performance incentive under Ofgem’s RIIO-ED2 price control framework - to include smaller connections. Supporters proposed either a new category focused on LCT adoption or adapting the existing survey to capture LCT-related enquiries. They felt this would complement time-to-connect metrics (another RIIO-ED2 performance incentive) and align with improvements in connection times seen under RIIO-ED1. Others, however, raised concerns that customers may confuse installer performance with that of the DNO, potentially skewing satisfaction scores and preferred alternative mechanisms that more directly reflect DNO performance.
- 6.33. Responses highlighted the need for better visibility of LV network capacity for customers and installers. Respondents noted that current LV transparency is generally poor, with some areas appearing to have available headroom but still facing constraints for LCT approvals. Greater clarity would help customers and installers plan installations and avoid unexpected delays. There was also support for adopting tools such as a ‘Connection Readiness Indicator’⁴⁵ across all DNOs. This metric would indicate a property’s readiness for LCT connections and allow customers to request necessary upgrades.
- 6.34. Some respondents called for a clearer definition of ‘minor connections’, noting that ambiguity that could lead to misinterpretation (eg, inclusion of on street or unmetered connections). Suggestions included confirming that the term refers specifically to domestic or residential connections.

⁴⁵A tool developed by SSEN to show how ready a property is to connect LCTs. It uses data on network details to give customers on upfront indication of whether upgrades are needed. [LCT Connections Readiness Indicator | ENA Innovation Portal](#)

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**Question 6c: Addressing poor performance**

Do you have views on how poor performance could be addressed under these proposals to ensure the smallest scale customers are protected and LCT roll out is supported?

- 6.35. Several respondents supported the use of incentives to improve smaller connections performance. They highlighted that incentives are more likely to stimulate innovation and proactive behaviour, whereas obligations risk creating a compliance-only mindset. Among those in favour, most preferred reward-only incentives, noting that penalties could unfairly penalise DNOs for delays outside their control – such as third-party access or customer readiness.
- 6.36. Some respondents proposed incentives linked to proactive activities such as unlooping⁴⁶. It was noted, however, that current mechanisms may unintentionally prioritise reactive work and recommendations included setting targets based on future volumes rather than historic performance.
- 6.37. Respondents stressed that any enforcement or incentive mechanism must be underpinned by robust data. It was highlighted that to implement an obligation or incentive, the baseline data used must be monitored and reviewed – currently there is no formal review of this data by Ofgem or any independent body. Respondents felt that monitoring and publishing performance data, such as league tables, would be critical to ensuring transparency and accountability.

Our Response

- 6.38. We welcome that the issues we identified in this theme were overall recognised and agreed with by respondents, and that it was broadly acknowledged improvements can be made in this area. We also acknowledge the progress being made by DNOs to simplify and improve existing processes and to innovate and collaborate. We encourage this to continue.
- 6.39. Together with the UK government, we have high ambitions for smaller connections as more customers interact with DNOs to install LCTs. Some actions will be proactive, such as proactive unlooping⁴⁷, while others will be reactive. We expect DNOs to work closely with installers, manufacturers, suppliers, and other networks to build consumer confidence in adopting LCTs and participating in the energy transition.
- 6.40. We recognise that this is an important area to get right for customers, both domestic and small-scale non-domestic, and for installers nationwide. We

⁴⁶ A 'looped' electricity supply is where two (or more) properties share a single electricity cable from the main network. 'Unlooping' replaces the looped service with a direct supply to the main network for each property.

⁴⁷ As part of ED3 SSMC, we have consulted on DNOs having a proactive unlooping programme in place.

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consider that smaller connection customers should receive consistent and high levels of performance from their DNO. This should be true whether they are paying for a new connection, requiring an update to an existing connection, or notifying a new install with no further works required. This will help reinforce trust and confidence in the process.

- 6.41. We recognise that full procedure standardisation is not feasible given varying network constraints. However, customers and installers should experience consistent processes, receive clear and standardised information, and know what to expect from their DNO if the DNO fails to meet their obligations, including the escalation routes available to them.
- 6.42. We acknowledge this can put additional pressures on DNOs and that there are trade-offs to consider. For example, minimum standards which drive faster connection times, but still allow connection customers to specify their dates for works. However, given increasing numbers of smaller connection requests, we see standardisation, where possible, as necessary to guarantee customer protection and speed up existing connection times.
- 6.43. Since the original consultation, we have advanced some of our proposals through the ED3 price control setting process and have consulted on them in our SSMC⁴⁸. These proposals incorporate suggestions from respondents in answer to questions 6b and 6c. They include incentivising connection upgrades as well as new connections under the next electricity distribution price control, redefining our connection types to make smaller connections clearer, and expanding the smaller connections incentive to include a customer satisfaction survey on connections, including LCTs.
- 6.44. Alongside this, we are working with the UK government and DNOs on three priority areas for DNOs to make progress in now to meet the pace of change required for the ED3 period. These are improving automatic approvals rates, accelerating proactive unlooping, and ensuring GSoPs are consistently applied to smaller connections.

Decisions and proposals

Decision 6.1

- 6.45. **We will proceed with the development of minimum standards that DNOs are obliged to meet for smaller connection requests.**
- 6.46. There are already some regulatory standards in place such as the Connections GSoPs (The Electricity (Connection Standards of Performance) Regulations 2015) which cover quotation, scheduling, works commencing, and works completed.

⁴⁸ Chapter 4: [ED3-sector-specific-methodology-consultation-core-document_clean.pdf](#)

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- 6.47. However, we are looking to set standards in a greater number of areas, including, but not limited to, time-based standards for approvals, quotations and response times, service-based standards through customer feedback, and performance-based standards through DNOs meeting their agreed connection dates with customers.
- 6.48. A number of these have been laid out in our SSMC proposal for incentivising time to approve, time to quote, and time to connect and with the addition of a customer survey specific to connections. We plan to continue with exploring standard setting through a mix of incentives, obligations, and licence conditions.
- 6.49. We recognise that the interplay between specifying standards through regulations, (ie, GSoPs) and through reward/penalty incentives needs to be properly worked through. This is to ensure they work to speed up connection times and protect customers (as set out in Decision 6.4), whilst maintaining choice over connection dates for customers, and accounting for delays outside the DNO's control, without unfairly penalising DNOs when they happen. We are actively working on these considerations through development of the smaller connections incentive in the forthcoming ED3 SSMD workshops, and through our planned stakeholder engagement as part of the E2E review.
- 6.50. In the original consultation, we used minimum standards/service level agreements (SLAs)⁴⁹ interchangeably (presented as 'or/or' in the original document). Respondents did not indicate a preference, and as our thinking has progressed, we see minimum standards as the most effective way to achieve our aims of reduced connections and being better able to hold DNOs to account for delays and poor performance. SLAs, as a contract between service provider (in this case the DNO) and customer, would not give us the same ability or oversight. As a result, we do not see a reason to further consider SLAs as part of this review.

Decision 6.2

- 6.51. **We will proceed with setting obligations on DNOs to align their processes to ensure high standards are set and are consistent across the processes discussed in this theme, and where appropriate, meet minimum standards.**
- 6.52. To advance this, we will host a programme of workshops with DNOs and stakeholders. These workshops will determine what processes can be aligned and made consistent, what communication can be standardised, and they will help inform standard setting as laid out in Decision 6.1 These workshops will also look at what DNOs need from connection requests to feel more confident about

⁴⁹ We did not define service levels agreements in the original consultation, but in this consultation, we are taking service level agreements to be contractual obligations between service provider and customers which define expected service performance standards, such as response times or availability. If the provider fails to meet these standards, remedies such as service credits, compensation, or contract termination may apply.

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making changes that simplify their connection processes, and they will build on previous DESNZ led workshops on auto-approvals and the notifications process.

6.53. We expect to explore producing guidance to support alignment, and the insertion of a licence condition to ensure adherence and set expectations.

6.54. We will begin advancing this proposal with the DNOs and stakeholders directly during the consultation period but are keen to gather views from respondents, in particular from installers and trade associations, on where they feel improvements can be made to the existing connections process, and what information DNOs provide which could be standardised and improved upon, for example a common approach to After Diversity Maximum Demand (ADMD) calculations⁵⁰.

Decision 6.3

6.55. **We will review existing DNO reporting requirements for smaller connections to ensure we can best monitor ongoing DNO performance and to help inform our development and setting of standards and incentives.**

6.56. We will consider new regulatory reporting requirements for connection upgrades under RII0-ED2 at the earliest opportunity. Likely areas include type(s) of connection activity carried out, time taken to complete, and, if deemed necessary⁵¹, what type of LCT requested, eg, EV charge points, heat pumps, batteries.

6.57. Publishing the DNO performance data, ie, through a league table, was also put forward in the original consultation, and we will consider this further as we carry out our review.

Decision 6.4

6.58. The two existing arrangements for financial recourse (automatic compensation under Connections GSoPs and the Energy Ombudsman (EO) as an impartial dispute resolution service) are broadly seen to be sufficient to meet the needs of smaller connections customers at this time. We do not propose to look further into a new consumer body for recourse but will reconsider if we find the existing routes to be insufficient as our work progresses.

6.59. However, **we intend to review the Connections GSoPs as they pertain to smaller connections.** This is to ensure they stay in line with any changes to the connections process, including the introduction of new standards, and focus on

⁵⁰ After Diversity Maximum Demand (ADMD) is an engineering estimate of the highest expected electrical load on a network after applying diversity factors. It accounts for the fact that not all connected customers use their maximum demand at the same time. DNOs use ADMD calculations to plan network capacity by predicting how much electricity homes will use at peak times, even as EVs and heat pumps become more common.

⁵¹ Ie, not duplicating data such as that collected by Microgeneration Certification Scheme.

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the parts of the journey where customers are most at risk of harm from poor DNO performance. We expect GSoPs to help speed up connection times and improve consistencies whilst protecting customers. We plan to progress this decision holistically with Decisions 6.1 and 6.2. Timelines for formal review and consultation will be determined as Decisions 6.1 and 6.2 progress.

- 6.60. It is important that customers know what to expect from their DNO should they fail to meet their obligations and what to do if they are unhappy with the quality of service received. Much of this can be addressed under Decision 6.2, which will ensure communication provided to customers by their DNO is standardised, clear, and thorough. To further support this, **we will look to work with the Energy Ombudsman to ensure all connections customers are well signposted to the services they offer covering DNOs.**
- 6.61. Since the original consultation, UK government are now reviewing the EO including options to strengthen their enforcement powers, provide statutory backing, and introduce automatic referrals. The current scope does not include DNOs. However, we are mindful that as more customers engage with DNOs through LCT installations, the likelihood of disputes may increase, leading to more cases requiring impartial adjudication. We will continue to monitor this review closely and work with relevant Ofgem teams that interface with the EO. We expect that any clarification of the EO's relationship with Ofgem through this review will help ensure clear escalation routes for issues that require regulatory intervention.

Decision 6.5

- 6.62. **We plan to require all DNOs to review their current G98 limits, with the view to raise them above the current national recommendation of 3.68kW.** We acknowledge this is already the case for some DNOs. Where it is determined limits cannot be raised, either at all or partially, we will expect DNOs to provide clear rationale for why not⁵², as well as clear plans for improving policies, service delivery, network visibility and capacity to mitigate customer impacts on going through the longer G99 process.
- 6.63. We see a DNO-led review of their G98 limits as essential to better understand and address this issue and help inform us if a national solution can be implemented, ie, a Distribution Code change to Engineering Recommendation G98. However, we recognise it is a complex area where DNOs must balance compliance, such as voltage limits, fault levels and protection, with network management priorities, and that a national change may not be feasible.
- 6.64. We also recognise that G98 cannot be reviewed in isolation, and **we will look at the DNO processes and policies around G99 and G100 for microgeneration in parallel.** We are not intending to look at the technical requirements for G99 and

⁵² We are aware of compliance issues with the Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002 and will account for this in the terms we set out for the review.

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G100. This includes a planned Request for Information (RFI) on current and past applications under G98, G99, and G100 for microgeneration⁵³, and close working with UK government across different policy areas looking at export. We will also take part in the government-facilitated V2X Technical Working Group, which is exploring how to enable Vehicle-to Grid (V2G) integration over the short and medium term.

- 6.65. During the consultation period, we will be in touch with DNOs to progress the review, including terms of reference, governance structure, approval processes, and timelines. DNOs will take forward this action, with potential support from the ENA, and we will look to the DNOs to peer review, and, in the spirit of test and challenge, work with each other to develop the most ambitious policies and standards⁵⁴ for microgeneration connection customers.
- 6.66. We expect this G98 review to be a one-off. In the short term, customers could benefit if some DNOs raise their limits immediately after their assessments. Longer term, further benefits will come as DNOs publish plans to improve policies and processes for microgeneration, including raising G98 limits where possible.
- 6.67. Across this decision, we will work closely with all stakeholders, to ensure we can improve existing processes and policies whilst keeping network safety and stability at the forefront.

Decision 6.6

- 6.68. We recognise there was broad consensus from respondents to strengthen obligations on installers to notify DNOs of LCT installations. **However, at this stage, and as the proposal currently stands, we are not taking it further forward.**
- 6.69. Since our original consultation there have been related developments in this area. This includes the Clean Flexibility Roadmap commitment for Ofgem to consult by end-2025 on new licence requirements for DNOs to maintain asset registers that enable data exchange and improve visibility. We expect it to enhance register quality, data completeness, and sharing. DESNZ have also carried out a call for evidence into ‘Improving the visibility of distributed energy assets’⁵⁵ with a response expected shortly.
- 6.70. DNO notification is, therefore, one part of a developing wider framework for installers, and whilst we recognise its importance, progress in this specific area is dependent on alignment with broader policy measures, many of which sit with UK

⁵³ The RFI will capture – but is not limited to - the types of applications submitted, their volumes, the types of LCTs connecting, and the export limits requested. The aim is to build a comprehensive view of microgeneration connections and identify where changes could deliver the greatest benefit for customers.

⁵⁴ Standards for G98 only. The technical requirements for G99 and G100 are intended to be out of scope.

⁵⁵ [Improving the visibility of distributed energy assets: call for evidence - GOV.UK](#)

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government. We intend to work with UK government, and other industry and compliance bodies, to ensure this framework is coordinated and developed holistically, and that the considerations of DNOs and other stakeholders are factored in as it develops.

6.71. Furthermore, the intended outcomes from this E2E review on smaller connections, should help address the issue of low notification rates by making improvements to streamline and simplify DNO processes, where possible. This should lead to greater compliance on the installer's part, increasing their confidence to notify and to do it accurately and timely.

DECISION 6.1. We plan to proceed with the development of minimum standards that DNOs are obliged to meet for smaller connection requests.

DECISION 6.2. We plan to proceed with setting obligations on DNOs to align their processes, where possible, and will take this forward through direct engagement with the DNOs and broader stakeholders.

DECISION 6.3. We will review existing DNO reporting requirements for smaller connections and consider new regulatory reporting requirements under RIIO-ED2 at the earliest opportunity.

DECISION 6.4. As part of Decision 6.1 and 6.2, we will review Connection GSoPs as they relate to smaller connections. We will work to ensure connection customers are well-sighted and aware of their routes to recourse.

DECISION 6.5. We plan to require all DNOs to review their current G98 limits, with the view to raise them above the current national recommendation of 3.68kW. We will consider G99 and G100 processes and policies for microgeneration in parallel.

DECISION 6.6: We do not plan to progress the original proposal of strengthening installer obligations to notify DNOs of LCT installation any further. Instead we will work closely with government as the wider framework for installers develops.

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**New Questions**

Q6.1. Do you agree with our five decisions, and our planned approaches to taking them forward?

Q6.2. For Decision 6.1 – We understand that the time required to complete connection activities can differ depending on the scope of work. To help us establish appropriate expectations, we would welcome your views on suitable timeframes for the DNO to complete the following activities once the customer submits a formal application/request:

- i. fuse upgrades
- ii. cut out upgrade
- iii. three-phase supply upgrades
- iv. service cable upgrade
- v. unlooping (reactive)

Q6.3. For Decision 6.2 – What information could DNOs provide, clarify, or signpost to, which would make the connections application process simpler for installers/customers? For example, what sort of information could they provide on their websites?

Q6.4 – For Decision 6.3, how could Ofgem strengthen its approach to monitoring, reporting, and enforcement when poor performance is identified? What – in respondents' views - should be the frequency of DNO reporting?

Anything else:

Q6.5. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Next Steps

6.72. We plan to develop the specifics of these decisions through direct engagement with stakeholders and DNOs, alongside formal consultation, as necessary. While we welcome written responses to the questions set out here, we will also be engaging directly with stakeholders throughout the consultation period in workshops and bilateral meetings to test our approach and gather further evidence for this detailed design phase. We will engage with both DNOs and broader stakeholders to ensure their input informs decisions and that changes to the smaller connections process meets the needs of all customers and installers. If you would like to be involved in these discussions, please contact the Connections Policy team.

6.73. We expect decisions on standards - excluding ED3 incentives but including a review of GSoPs pertaining to smaller connections (Decision 6.4) - and on standardising processes to be made during this price control period and to come into effect before 1 April 2028. These will remain subject to the relevant statutory consultation process.

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- 6.74. We will be reviewing our existing reporting on smaller connections and any new requirements for RIIO-ED2 regulatory reporting packs. We expect any changes to come in here during the RIIO-ED2 period.
- 6.75. We will contact DNOs directly to set out the terms and timeframes of the G98 Review. The outputs of this review will help determine if a G98 code change is required. If we determine it to be, we will pursue the raising of a code modification during this price control period.

Theme 7: Provisions and guidance for determinations

Problem statement

- 7.1. The connections determination process, which is designed to resolve disputes arising within the connections process, can be confusing, lengthy, and requires significant engagement and resource commitment from all parties involved.

Goal

- 7.2. Greater clarity and transparency for all parties on the determination process, the available redress to parties involved (noting this can only be indicative), and on Ofgem's role in managing complaints and issuing determinations.

Summary of issues we identified in the consultation

- 7.3. Here we summarise the issues we originally identified and set out in the original consultation. See the original consultation for more detail.
- 7.4. The threat of raising a determination can be used as a bargaining/leveraging tool by an impacted party, even when it's clear Ofgem may not have the vires to determine. This can waste time and resources in network companies.
- 7.5. Parties occasionally approach Ofgem prematurely, with the expectation of assistance, before making a complaint to the network company or to NESO and going through their respective dispute resolution processes, and/or before approaching the Energy Ombudsman. This consumes time and resource within Ofgem.
- 7.6. Complainants expect forms of redress or restitution that Ofgem do not have the vires to provide.
- 7.7. The determination process can be lengthy, protracted and inefficient.
- 7.8. There is a suggestion that Ofgem should revisit the publicly available guidance for determinations, in the context that the latest version has become out of date as the connections process has evolved.⁵⁶

Stakeholder views

- 7.9. This section summarises the responses we received to each of the questions in the consultation in turn. The list of questions and proposals can be found in Appendix 1.

⁵⁶ [Ofgem guidance on the determination of disputes for use of system or connection to energy networks | Ofgem](#)

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Question 7a. The issues

Do you agree with the issues we have set out under Theme 7 – Provisions and guidance for determinations? Are there any other issues under this theme that we should consider or be aware of?

- 7.10. Approximately half of respondents to the consultation answered the Theme 7 questions. Of those who answered, the majority agreed with the issues we set out under Theme 7 (listed above).
- 7.11. Respondents to the consultation raised issues with both the current network dispute resolution processes and the Ofgem determination process.⁵⁷
- 7.12. In addition to the main issues set out in our consultation, other substantive points raised by respondents are provided below.
- 7.13. The current process is too resource intensive, in terms of both time and human resource, making resolving a dispute an expensive undertaking.
- 7.14. In the current process, the relationship between the network companies and connecting customers is unequal, eg,:
- i. there are no consequences for network companies if they fail to respond to issues, whereas customers run the risk of losing connections if they do not meet deadlines
 - ii. attempts to find resolution are often one-sided with all the effort coming from the customer
 - iii. some connecting customers fear that involving Ofgem to make a determination will result in less favourable treatment in future from the network company
 - iv. routes to escalate currently feel pointless given the imbalance that exists in the contracting relationship
 - v. Ofgem can refuse to determine on matters which are in the customers' best interests with very little by way of reasoning
- 7.15. Lack of clarity, eg,:
- i. there is no clear process for appeal available to the developer when a connection offer is unreasonable or excessively delayed
 - ii. the majority of determination requests are a result of the performance metrics and standards that NESO and DNOs are required to meet being unclear or poorly defined throughout the connection process

⁵⁷ In what follows, when we refer to “dispute resolution processes” we mean the pre-determination processes in place at network companies and at NESO to resolve the issues that they are made aware of. When we refer to “determination process” we mean the process in place at Ofgem for resolution of any requests for determination formally made to us. Finally, when we refer to “current process”, we mean both the pre-determination dispute resolution processes and the determination process.

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7.16. Lack of control/oversight, eg,:

- i. for determination requests, there are no limits on submission lengths or volumes of evidence provided, which can cause issues for network companies and Ofgem during the review process when faced with overly detailed submissions
- ii. for the current process, there is no strict timeline for each of the steps towards dispute resolution
- iii. it is not clear how determination requests are logged and analysed to spot broader trends which may require Ofgem's involvement/intervention on the broader topic

Question 7b. Guidance for determinations**Do you have any views on Proposal 7a (Ofgem to review the guidance for connection determinations)?**

Proposal 7a: Ofgem to review the guidance for connection determinations with a view to updating it if changes are considered appropriate / necessary for the current connections process and landscape.

7.17. The majority of respondents agreed with our proposal to review the provisions and guidance for determinations.

7.18. A small minority of respondents disagreed with this proposal, either because they were of the view that the current process in its entirety needs to be revised rather than just the guidance for Ofgem determinations, or because they favoured the creation of a new adjudication body to take control of the current process.

7.19. Respondents also took this opportunity to make suggestions as to what the Ofgem guidance review should consider. The most popular suggestion was for Ofgem to explore setting timelines for each of the stages of the current process (from raising an issue with a network company all the way through to Ofgem making a decision on a determination request), based on a review of timelines of past disputes. Other substantive suggestions mentioned by several respondents included:

- i. the guidance for determinations needs to be updated to take account of TMO4+ reforms, as well as updates to industry structure, such as the creation of NESO and its role in managing applications to connect to the transmission network, and its role determining which applicants should receive a Gate 1 or Gate 2 connection offer
- ii. Ofgem's role and powers with respect to determinations need to be clarified, eg, the types of decisions that can be referred to Ofgem for determination
- iii. clarity is needed regarding all available routes for redress, and information as to the type of redress available via each route

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- iv. clarity is needed regarding the route for escalation of a dispute, including when to escalate the dispute to Ofgem for a determination

Additional suggestions

7.20. Strengthen existing powers and obligations. For example:

- i. the roles of Ofgem (regulatory determinations), NESO (connection offers and queue management) and the EO (domestic customer complaints) need to be broadened so that disputes can be addressed comprehensively and no issues remain unresolved due to falling through gaps between respective areas of authority; this might involve:
 - a. extending Ofgem’s determination powers to address standards of service issues, such as unreasonable connection delays
 - b. tasking NESO with greater ownership and accountability to more effectively manage the contractual interface between its customers and relevant TOs, to ensure consistency and that all TOs are held to the same standard of performance
 - c. giving NESO the power to act as a first-tier resolution body offering mediation or arbitration services before escalation to Ofgem
 - d. extending the remit of the EO to cover large-scale connection disputes and disputes relating to small generators and community energy projects
- ii. licence conditions should be introduced to set prescriptive requirements for network companies to adhere to, making compliance compulsory and enforceable; for example, around timelines for dispute resolution, service standards (clear expectations for each stage of the process), and reporting obligations (obligate network companies to record received complaints and whether they were resolved, and to share complaint statistics with Ofgem on a regular basis)

7.21. Ensure consistency between network companies and between transmission and distribution, eg.:

- i. network dispute resolution processes should be standardised
- ii. best practice from dispute resolution processes within and outside the industry should be evaluated and adopted where appropriate
- iii. Ofgem must make a commitment to review dispute resolution processes and the determination process each time the landscape changes, or on a periodic basis

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- 7.22. ENA should increase the number of scenarios in their Best Practice Guide⁵⁸, and provide a path for assistance if an issue does not fit a standard scenario.
- 7.23. Consider establishing an alternative adjudication process, such as an independent body to oversee connection disputes to ensure fair outcomes, with sufficient knowledge and expertise to adjudicate disputes fairly, featuring representation from NESO, the ENA, network companies, developers and representatives of developers (eg, RUK).
- 7.24. Streamline and simplify the current process, eg,:
- i. Ofgem’s current role in the determination process appears to be little more than that of an intermediary in back-and-forth email exchanges between the network company/NESO and the connecting customer; this is an inefficient use of Ofgem’s time
 - ii. named points of contact within Ofgem for determinations and within network companies/NESO for dispute resolution would be useful
 - iii. there should be a requirement for network companies to acknowledge receipt of and formally respond to complaints at each stage
 - iv. Ofgem should not accept requests for determination if network dispute resolution processes have not first been followed
 - v. network companies, NESO and Ofgem should prioritise quick resolutions to disputes that could hinder critical projects
- 7.25. Update Ofgem guidance for determinations to:
- i. include templates outlining the information and level of detail that would be expected from each party at each stage of the determination process
 - ii. include whether there are types of determination request that are more likely to trigger Ofgem to need to seek technical advice, which can extend the process
 - iii. signpost to the dispute resolution processes of the network companies and NESO
- 7.26. NESO and the network companies should provide guidance for their dispute resolution processes, which includes:
- i. templates outlining the information and level of detail that would be expected at each stage of the process
 - ii. clear criteria outlining when they would be in violation of service levels, to ensure accountability and enforceability
 - iii. clarity on whether there are criteria that would determine exceptional cases where a party can recover costs against the other party

⁵⁸ [Fair and Effective Management of DNO Connection Queues: Progression Milestones Best Practice Guide \(November 2016\) – Energy Networks Association \(ENA\)](#)

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7.27. Respondents were clear that Ofgem should expect an increase in the number of determination requests on account of the TMO4+ reforms.

Question 7c. Additional comments**Is there anything else regarding Theme 7 – Provisions and guidance for determinations?**

7.28. Respondents were generally supportive of Ofgem having a role in the current process, and the consensus was that a strong regulatory presence is essential for maintaining fairness and transparency. However, they also highlighted that the current process fails to offer a route through disputes which preserves and fosters good working relationships between developers and network companies, and they would like Ofgem to consider how this can be addressed.

7.29. Respondents suggested that, in our review of the current process, Ofgem consider the following:

- i. improvements outlined in Themes 1-6 of the end-to-end review are likely to reduce the number of cases requiring determination
- ii. this review may highlight the benefit of using the determination process, which may increase the demand on Ofgem resources
- iii. Ofgem should consider the impact of projects engaged in prolonged disputes on the connections queue, and therefore, consider setting enforceable timescales for dispute resolution
- iv. some respondents raised concerns that principles-based licence conditions, as suggested in many of the end-to-end review proposals, have the potential to increase the number of disputes for trivial matters, as they are not specific enough to provide clarity as to what constitutes acceptable practice on the part of the network company/NESO and what does not

7.30. The following recommendations were made by respondents:

- i. Ofgem needs to be adequately resourced, preferably in the form of a dedicated expert team, to deal with determination requests as a decision maker rather than just a mediator
- ii. Ofgem should log and analyse issues raised in requests for determination to identify broader trends that could warrant Ofgem's involvement at a more general level
- iii. dispute resolution processes should be made public by network companies and NESO

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Our response

Summary of key concerns/asks

- 7.31. Before coming to Ofgem to request a determination, stakeholders would like more streamlined and timely dispute resolution processes across transmission and distribution, with formalised escalation routes within network companies and NESO. They would also like to see an alternative dispute resolution process to the established processes within network companies, such as an independent adjudicator or ombudsman.
- 7.32. Regarding the Ofgem determination process, stakeholders want Ofgem to use determination request data to identify systemic issues. There is broad agreement that the current determination process is opaque, slow, and resource-intensive. Finally, stakeholders want clearer guidance on Ofgem’s powers, timelines, and evidence expectations.

Ofgem guidance for determinations

- 7.33. **We will proceed with our proposal to review and update our guidance for determinations.** This review will be split into two stages.
- 7.34. Stage 1: Changes related to TMO4+ reforms: Given the urgent need for clarity regarding the determination process in the context of the Gate 2 to Whole Queue (G2tWQ) exercise, we will issue a supplementary guidance document ahead of a full review of the main guidance document.
- 7.35. Stage 2: A full review and update of the main guidance document: This work will begin in early 2026 following this consultation.

Supplementary guidance to reflect TMO4+ reforms

- 7.36. The TMO4+ reform package, approved by Ofgem in April 2025, enabled a new process for electricity connections to prioritise projects that are ‘ready’ and ‘needed’ (ie, meeting the criteria within CP2030 strategic plans).⁵⁹ These prioritised projects will join the Gate 2 queue. G2tWQ is the name given to the one-off exercise that will streamline the existing connections queue so that it is focused on those ‘ready’ and ‘needed’ projects.
- 7.37. Ofgem recognises that the G2tWQ exercise creates the potential for disputes to arise between connecting customers and network companies. Whilst Ofgem expects that the dispute resolution processes of the network companies will be followed first, together with any other appropriate form of alternative dispute resolution, we recognise that some G2tWQ-related disputes will not be resolved without Ofgem playing a role. We have, therefore, taken the decision to produce

⁵⁹ [Clean Power 2030 Action Plan: A new era of clean electricity – connections reform annex \(updated April 2025\) - GOV.UK](#)

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supplemental guidance to explain when and how we expect to exercise our dispute resolution functions in relation to G2tWQ. This guidance has already been published for consultation.⁶⁰

Case management software

7.38. **We have incorporated functionality into our new ‘Determinations Gateway’ to allow us to identify trends in determinations submitted.** We will use this information to inform our future policy development, by identifying systemic issues for us to address and areas for improvement.

7.39. This new gateway system is being introduced concurrently with the G2tQW process for determinations outlined in the draft supplementary guidance referenced above. It will require parties to submit any requests for determination to the email address specified in the supplementary guidance. There will be a proforma template to complete, which will set out the information we need in order to make a determination. This proforma will ask for evidence that alternative dispute resolution steps have been exhausted.

Standardisation of dispute resolution processes

7.40. Consultation responses were very clear that existing dispute resolution processes vary significantly between network companies and between transmission and distribution. This can be confusing for customers who have connection applications in multiple network company jurisdictions or across transmission and distribution. It is also an impediment to the efficient running of the Ofgem determination process. Ofgem staff currently deal with determination requests from parties who have experienced very disparate dispute resolution journeys. It takes time to establish exactly what journey has been followed and whether the necessary alternative dispute resolution options have been exhausted.

7.41. **It is our conclusion that, in the interests of a better customer experience and a more efficient determination process, dispute resolution journeys need to be more uniform. Therefore, we propose to require network companies, with the support of the ENA and NESO, to explore agreeing a standard way of dealing with disputes. This will ensure that all customers follow the same dispute resolution journey before coming to Ofgem to seek a determination. This standardised process should be set out in industry guidance and should include timelines for different stages and routes for escalation.**

⁶⁰ [Supplemental Ofgem Guidance on the determination of disputes Gate 2 to Whole Queue consultation.pdf](#)

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Decisions and proposals

DECISION 7.1. We will consult on and update the Determinations guidance. This will take place across two stages:

- i. supplementary guidance is being consulted on that reflects the G2tWQ process, clarifying the determination process and Ofgem’s role within it
- ii. a full review of the existing guidance will be undertaken to ensure that it is up to date and to improve clarity

DECISION 7.2. We will utilise a case management system with reporting functionality to identify trends in determination requests. We will use this information to inform policy to resolve systemic and frequently reported issues.

PROPOSAL 7.1. We will ask network companies across transmission and distribution to explore standardising their dispute resolution processes.

New questions

Q7.1. Do you agree with Proposal 7.1 that requires network companies across transmission and distribution to explore standardising their dispute resolution processes?

Anything else:

Q7.2. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Next steps

Decision 7.1.

7.42. Determinations guidance will be updated in two stages.

7.43. Stage 1: Supplementary guidance that reflects the G2tWQ was published for consultation on 31st October 2025. The consultation closed on 14th November 2025. The responses have been reviewed. The non-confidential responses will be published alongside our decision on our website on 8th December 2025.

7.44. Stage 2: Ofgem will undertake a full review of existing guidance to ensure that it is up to date and to improve clarity. A statutory consultation will be published detailing any proposed changes to the guidance.

Decision 7.2.

7.45. A case management system has been created with reporting functionality to allow Ofgem to identify trends in determination requests. This information will be reviewed at least quarterly.

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Decision 7.3.

7.46. We recommend that ENA and NESO convene workshops for industry stakeholders (network companies and developers) to discuss the current network company dispute resolution processes, best practice and ways to standardise. Progress towards standardisation should be reported on to the CDB.

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Your response, data and confidentiality

How to respond

We want to hear from anyone interested in this consultation. Please send your response to the person or team named on the front page of this document.

We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website.

Your response, data, and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information. For example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations, or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the United Kingdom's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 2.

If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

General Feedback

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this consultation. We would also like to get your answers to these questions:

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- i. Do you have any comments about the quality of this document?
- ii. Do you have any comments about its tone and content?
- iii. Was it easy to read and understand? Or could it have been better written?
- iv. Are its conclusions balanced?
- v. Did it make reasoned recommendations?
- vi. Do you have any further comments?

Please send your feedback to stakeholders@ofgem.gov.uk.

How to track the progress of a consultation

1. Find the web page for the call for input you would like to receive updates on.
2. Click 'Get emails about this page', enter your email address and click 'Submit'.
3. You will receive an email to notify you when it has changed status.

A consultation has three stages: 'Open', 'Closed (awaiting decision)', and 'Closed (with decision)'.

Appendix 1: List of new Questions / Proposals

Theme 1 - Improving visibility and accuracy of connections data

Q1.1. Do you agree with Proposal 1.1. to introduce a new licence condition for accurate, complete and timely data?

Q1.2. Do you agree with Proposal 1.2. to split data into open and sensitive categories, and to use the Data Sharing Infrastructure to share sensitive data?

Q1.3. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Theme 2 - Improved standards of service across the customer journey

Q2.1. Do you agree with Proposal 2.1, ie, the milestones we have set out for inclusion in the prescriptive licence conditions? Are there any other milestones we should consider?

Q2.2. What processes / behaviours within the connections customer journey could be targeted effectively with a principles-based licence condition?

Q2.3. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Theme 3: Requirements on networks to meet connection dates in connection agreements

Q3.1. Do you agree with Decision 3.1 to introduce a strengthened GSoP framework targeting connection dates? Do you have any views on specific design points, eg, how should the value be set, should it be tailored to different customer types, what milestones should they be set against etc?

Q3.2. Do you agree with Decision 3.2 to develop mechanisms to ensure GSoPs are accurately reported publicly?

Q3.3. Do you agree with Proposal 3.1 to explore further the introduction of liquidated damages as standard into connection contracts? Why do you consider liquidated damages are not currently inserted into contracts between the customer and the network company?

Q4.4. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Consultation Connections End-to-end Review – Updated Proposals and Next Steps**Theme 4: Quality of connection offers and associated documentation**

Q4.1. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Theme 5: Ambition of connection offers

Q5.1. Do you have any views on Proposal 5.1, ie, the concept of an ‘energisation window’ with a start date, acting as an ambitious target, and an end date, acting as a backstop?

Q5.2. Do you any views on Proposal 5.2, ie, the concept of an ‘opt-in’ mechanism for earlier connection dates, to provide optionality for customers to accept earlier connection dates if one becomes available?

Q5.3. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Theme 6 – Minor / Smaller Connections

Q6.1. Do you agree with our five decisions, and our planned approaches to taking them forward?

Q6.2. For Decision 6.1 – We understand that the time required to complete connection activities can differ depending on the scope of work. To help us establish appropriate expectations, we would welcome your views on suitable timeframes for the DNO to complete the following activities once the customer submits a formal application/request:

- i. fuse upgrades
- ii. cut out upgrade
- iii. three-phase supply upgrades
- iv. service cable upgrade
- v. unlooping (reactive)

Q6.3. For Decision 6.2 – What information could DNOs provide, clarify, or signpost to, which would make the connections application process simpler for installers/customers? For example, what sort of information could they provide on their websites?

Q6.4. For Decision 6.3, how could Ofgem strengthen its approach to monitoring, reporting, and enforcement when poor performance is identified? What – in respondents’ views - should be the frequency of DNO reporting?

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Q6.5. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Theme 7: Provisions and guidance for determinations

Q7.1. Do you agree with Proposal 7.1 that requires network companies across transmission and distribution to explore standardising their dispute resolution processes?

Q7.2. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Appendix 2: Privacy Policy

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

Information: Include here all organisations outside Ofgem who will be given all or some of the data. There is no need to include organisations that will only receive anonymised data. If different organisations see different set of data then make this clear. Be as specific as possible.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for (be as clear as possible but allow room for changes to programmes or policy. It is acceptable to give a relative time e.g. ‘six months after the project is closed’)

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data

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- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas (Note that this cannot be claimed if using Survey Monkey for the consultation as their servers are in the US. In that case use “the Data you provide directly will be stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in term of data protection will not be compromised by this”.

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system. (If using a third-party system such as Survey Monkey to gather the data, you will need to state clearly at which point the data will be moved from there to our internal systems.)

10. More information For more information on how Ofgem processes your data, click on the link to our “[ofgem privacy promise](#)”.

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Appendix 3: Glossary

Abbreviation	Term
CAP	Connections Action Plan
SSMC	Sector Specific Methodology Consultation
DESNZ	Department of Energy Security and Net Zero
CP2030	Clean Power 2030
DNO	Distribution Network Operator
TO	Transmission Operator
NESO	National Energy System Operator
GSoP	Guaranteed Standards of Performance
ED3	Electricity Distribution 3
TAAP	Transmission Acceleration Action Plan
IDNOS	Independent Distribution Network Operator
ICP	Independent Connection Advisor
RMS	Relevant Market Segments
TTC	Time to Connect
MCCSS	Major Connections Customer Satisfaction Survey
SLA	Service Level Agreements
ANM	Active Network Management
ECR	Embedded Capacity Register
TEC	Transmission Entry Capacity
DFES	Distribution Future Energy Scenarios
LTDS	Long Term Development Statements
LCT	Low Carbon Technology
GIS	Geographic Information System
LV	Low Voltage
HV	High Voltage
EHV	Extra High Voltage
CIM	Common Information Model
ENA	Energy Networks Association
DSI	Data Sharing Infrastructure
GSP	Grid Supply Point
EV	Electric Vehicle
SCG	Strategic Connections Group
SOO	Statements of Obligation
SVI	Smart Visualisation Interface
API	Application Programming Interface
NDP	Network Development Plan
TWR	Transmission Works Report
TORI	Transmission Owner Reinforcement Instruction
DCR	Demand Capacity Register
MVP	Minimum Viable Product
CDB	Connections Delivery Board

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TIA	Transmission Impact Assessment
TPW	Third Party Works
LD	Liquidated Damages
MCI	Major Connections Incentive
MCAR	Major Connections Annual Report
SSMD	Sector-Specific Methodology Decision
G2TWQ	Gate 2 to Whole Queue
LLD	Load Limiting Device
PBLO	Principles-Based License Obligations
BUS	Boiler Upgrade Scheme
ESQCR	Electricity, Safety, Quality Compliance Requirements
MCS	Micro-certification Scheme
BMCS	Broad Measure Customer Satisfaction
CRI	Connections Readiness Indicator
ADMD	After Diversity Maximum Demand
EO	Energy Ombudsman
RFI	Request for Information
V2G	Vehicle to Grid