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Response to Draft Determination on NESO 1 Business Plan

On behalf of the SSE Group, I welcome the opportunity to contribute our views on the Draft Determinations on NESO Business Plan 1, which sets out NESO's delivery focus for the period April 2026 to March 2028.

We appreciate Ofgem's move toward a more output based- assessment framework, supported by clearer expectations and success measures. This shift provides stakeholders - and NESO itself - with a more objective basis for evaluating performance. In our response, we highlight where Ofgem's expectations could be strengthened and propose additional success measures to better reflect intended outcomes and hold NESO to account. As a general comment, we recommend that NESO conduct ex-post evaluations for major reforms and decisions as this essential for accountability, learning, and continuous improvement.

We also agree with Ofgem's addition of a performance objective on high quality customer service as it integrates all the other performance objectives by creating a unified standard for evaluating quality and performance across them. It also reinforces trust, transparency and accountability across the different work streams for which NESO is responsible.

NESO benefits from the collective interest of the whole industry in seeing it succeed. Realising this potential will depend on high-quality stakeholder engagement and strong transparency. We also look forward to Ofgem's decision regarding the Independent Challenge Panel, which offers an additional- and valuable avenue for stakeholders to provide feedback on NESO's delivery.

We have provided detailed responses to all consultation questions in Appendix 1. We would welcome the opportunity to discuss any aspect of our response further, should that be helpful.

Yours sincerely,

Folasewa Sulaimon

Regulation Manager

APPENDIX 1 – ANSWERS TO CONSULTATION QUESTIONS

Q1. Do you agree with our assessment that NESO's six Performance Objectives, alongside Ofgem's additional Performance Objective allows for comprehensive assessment of NESO's performance?

Yes, we agree with Ofgem's objective assessment of the performance objectives. We also think it is valuable to take an outcome-based approach by setting out the expectation and tangible success measures against each performance objective.

Ofgem's additional Performance Objective - *providing customers with a high quality, independent- and trusted service* - acts as an overarching framework that ties together all the other NESO Performance Objectives. It ensures NESO is assessed not just on the delivery of technical outputs but also on **how transparently, consistently and accountably** it delivers. In doing so, it strengthens NESO's role as a key stakeholder.

Q2. Do you agree that this sets a comprehensive set of Ofgem Expectations for the Planning a Clean Energy Future Performance Objective?

We agree that the expectations are comprehensive, subject to success measures being strengthened to demonstrate meaningful progress as well as NESO's ability to manage competing tensions within its remit.

Additionally, we are concerned about risks arising from evolving NESO responsibilities. Overlapping roles between NESO, TOs and Ofgem could create misaligned accountabilities, especially where TO regulatory obligations become dependent on NESO delivery.

Strong governance forums should be used not only for oversight but to actively clarify responsibilities and resolve ambiguity, as illustrated by imbalances between NESO aspirations and TO obligations under CSNP. An example of where clear role delineation has been a success is demonstrated by industry engagement in codifying NESO-TO responsibilities in the STC within the market competition space for providing core system operability solutions.

Q3. Please provide any views you have on the Success Measures which should be used to identify of NESO success or otherwise of these Ofgem Expectations.

NESO should be held to achievable, consistent metrics within its control, supported by interim milestones and "lessons learned" outputs for major reforms. Success measures should also set out relevant delivery partners, ensure adherence to ISOP information request standards, assess the quality of stakeholder engagement, and better define regulatory boundaries and roles in competitive markets.

Q4-Q17

Do you agree that a comprehensive set of expectations has been provided for each Performance Objective?

We have set out our views on the expectations for each Performance Objective in the tables below.

Please provide any views you have on the Success Measures which should be used to identify of NESO success or otherwise of these Ofgem Expectations.

We have set out our views on the success measures against each Performance Objective in the tables below:

Performance Objective - Planning a Clean Energy Future

S/N	Ofgem Expectation	Success Measure	Comment
A1	Improved coordination in network planning and development.	<ul style="list-style-type: none"> • participation and representation across societal, environmental, geospatial, and advisory groups • endorsement of plans by established governance; Number and quality of SEP datasets provided. 	<p><u>Expectation</u></p> <p>We support the expectation that NESO ensure stakeholders understand the interaction between the different strategic plans. Accordingly, we recommend the inclusion of a success measure that requires NESO to set out in detail, the interactions between the different strategic plans.</p> <p>Additionally, SSE believes that NESO's responsibility to ensure coordination when developing its network plans should go beyond sharing improvements on modelling inputs. NESO should also provide transparency and secure buy-in from stakeholders by sharing and facilitating industry peer review regarding relevant input assumptions, output data, detailed modelling approaches and the models themselves, wherever possible.</p> <p><u>Success Measures</u></p> <p>The most important output from strategic planning activities which should be set out as a success measure is the timely delivery of high-quality plans (SSEP, CSNP and RESP) that are explicitly endorsed by industry</p>

S/N	Ofgem Expectation	Success Measure	Comment
			<p>stakeholders (TOs, DNOs, generators, government etc).</p> <p>In addition to getting the plans endorsed by governance, NESO should regularly assess and improve the effectiveness of the governance.</p> <p>Finally, NESO must adopt the recommendation of the Energy Data Task Force by ensuring that SEP data sets and models are openly published for stakeholder review.</p>
A2	Improved signals result in a pipeline of investments well aligned to future system needs.	<ul style="list-style-type: none"> Consistency of NESO signals across SEP outputs. Alignment of investment pipeline to NESO needs identification. 	<p><u>Success Measures</u></p> <p>It is unclear how consistency across SEP outputs will be assessed, or at what point such an assessment will take place—whether only at publication or on an ongoing basis as investments progress. This requires clarification to ensure a fair and transparent evaluation at the end of the business period.</p> <p>It is also unclear how Ofgem or NESO intend to monitor alignment between SEP identified needs and actual investments. To enable meaningful tracking, appropriate tools must be established- to monitor this alignment continuously after publication of NESO's plans.</p>
A3	Investors show increased confidence in the energy market, supported by clear, stable market rules	<ul style="list-style-type: none"> Percentage track to milestones set in roadmaps / strategies. Number and quality of Stakeholder engagements. BUSoS forecast accuracy. 	<p><u>Success Measure</u></p> <p>The quality of stakeholder engagements should be prioritised over the number of stakeholder engagements. Engagements must be meaningful – giving stakeholders opportunity to provide feedback, receive diligent responses from NESO and learn how their feedback is being used.</p>

S/N	Ofgem Expectation	Success Measure	Comment
		<ul style="list-style-type: none"> TNUoS forecast accuracy; Number of billing delays, e.g. due to system issues. 	The quality of the engagement should also be assessed together with direct feedback from stakeholders via the ICP and not just NESO's account.
A4	Greater competition and innovation in network development.	<ul style="list-style-type: none"> Number and quality / fit of potential projects for competitive delivery identified Tender process stages run in line with expectations in line with SOP Appropriate level of market interest at relevant stages Market readiness, including mock tenders or other engagement 	<p><u>Expectation</u></p> <p>SSE does not believe that NESO should be expected to "grow bidder volumes" as part of the expectation to run tenders efficiently. The number of bidders is not a clear indicator of the health of a competitive market/tender process. The same expectation has been difficult to achieve with OFTO tenders.</p> <p>Similarly, there is no clear basis for measuring the effectiveness of the CATO regime using the number of potential projects identified for competitive delivery. The lack of suitable projects might be the result of the regulatory framework rather than NESO's failure to identify suitable projects.</p> <p><u>Success Measure</u></p> <p>In view of our comments above, we suggest deleting reference to number of potential projects for competitive delivery. Using "number of projects identified" as a benchmark for success may develop into a perverse incentive for NESO to earmark projects for competition even when they are not suitable.</p> <p>Furthermore, SSE is of the opinion that market interest needs to be qualified further as a success measure. Without further clarification, it will be impractical for NESO to prove given that market interest hinges on multiple factors outside of NESOs' control. Ofgem should clarify what criteria would be</p>

S/N	Ofgem Expectation	Success Measure	Comment
			used to determine an "appropriate" level of market interest.

Performance Objective - Operating an Intelligent, Real-Time Grid

S/N	Ofgem Expectation	Success Measure	Comment
B1	NESO initiatives retain or improve system reliability standards while reducing costs of system balancing	<ul style="list-style-type: none"> • Dispatch Efficiency (including skip rates) • System Management and Disturbances • Aggregated cost savings by NESO initiatives; Balancing costs 	<p><u>Expectation</u></p> <p>It is our view that NESO should be required to develop transparent, granular and credible balancing cost forecasts as this will be critical in assessing actual balancing cost. The forecasts must be developed using clear, transparent, independently verifiable and industry peer reviewed methodologies.</p> <p>In delivering improved operational efficiency through modernisation of system tools, we expect the NESO will be open to stakeholder suggestions. Where NESO decides not to progress suggestions from market participants—such as ideas for new tools or market mechanisms—it should publish a clear rationale backed by evidence to ensure transparent and accountable decision making.</p> <p><u>Success Measure</u></p> <p>In developing/improving system reliability, a key success measure should be the requirement to deliver key IT tools for system management on time with clear accountability for delays that hinder cost-effective system operation.</p> <p>The skip-rates target should be dynamic and regularly reviewed to ensure it remains fit for purpose.</p>

S/N	Ofgem Expectation	Success Measure	Comment
B2	Improved Operational Planning and Forecasting	Accuracy of operational plans within control room.	<p><u>Success measure</u></p> <p>In assessing the accuracy of operational plans, stakeholders expect NESO to undertake systematic and regular reviews comparing forecasted outcomes with actual performance. Where operational decisions differ from the forecasts, NESO should investigate the root of the discrepancy. This is essential for identifying information gaps or weaknesses and areas for improvement in forecasting, data quality, or decision making.</p> <p>Following each review, NESO should be required to set out a clear plan describing how these gaps or credibility issues will be resolved, including any actions to strengthen forecasting methodologies and improve the quality of information used in control-room operations.</p>
B3	Extended periods of zero carbon operation and reduced electricity system carbon intensity	<ul style="list-style-type: none"> • Percentage Zero carbon operability on system by settlement period • Average and maximum carbon intensity of NESO actions by settlement period • Number of settlement periods of where market offers zero carbon operability opportunities which are not realised due to NESO actions. 	<p><u>Success Measures</u></p> <p>In assessing the average and maximum intensity of NESO's actions per settlement period, we would expect NESO to regularly carry out ex-post evaluation of its operational, procurement and strategic decisions against a credible hindsight-optimal benchmark. Such assessment must consider the full range of options available to NESO—including strategic planning, long and short-term contracting, real-time actions, investment in NESO systems and network capabilities, and improved coordination with TOs.</p> <p>NESO should regularly carry out ex-post assessments to determine whether its actions have maximised zero-carbon operational opportunities. Where they have not, NESO</p>

S/N	Ofgem Expectation	Success Measure	Comment
			<p>should provide ex-post reports identifying the reasons, the lessons and how these will be implemented to improve future performance. Specifically, these reports should cover NESO's RNP constraint management decisions such as accelerated upgrades, increased network utilisation, wider BM participation, forward contracting, and improved interconnector redispatch. Evidence from recent a multi-client report prepared by LCP¹ show that reducing constraint volumes can materially increase low-carbon delivery and lower emissions by 29% per year.</p>
B4	Outages are managed proactively and efficiently, with their impact minimised	<ul style="list-style-type: none"> • System availability • System reliability • Changes planned to outages 	<p><u>Success Measure</u></p> <p>It is SSE's view that using system utilisation is a better success measure over system availability as it considers how full the network is by using actual power flow over theoretical limit of the network boundaries. Using system availability alone ignores this metric on how well the network is being used.</p> <p>On system reliability, we recommend assessing NESO against metrics they have previously set out in transmission acceleration public consultations, including the commitment to deliver 60 weeks of benefit from OP1 winter emergency RTS.</p> <p>On changes to planned outages, it is our view that NESO should ensure that outage planning is undertaken in close coordination with end consumers, with outage timings</p>

¹ From Bottlenecks to Balance Impact of Reformed National Pricing (RNP) Measures on GB Grid Constraint Costs accessible [here](#)

S/N	Ofgem Expectation	Success Measure	Comment
			<p>agreed upfront, as opposed to frequent late alterations. This will go a long way in improving the institutions trust with the market.</p> <p>NESO should publish an ex-post analysis of how efficiently outages have been managed including the system costs caused by outages (e.g. constraint costs), compared with the cost that were incurred in adjusting outage management, and assessing to what degree the outturn outage management was optimal, with lessons learned regarding how approaches could be further improved for the future. The LCP report referenced above also makes suggestions on how better outage management can lead to lower congestion and reduced carbon emissions.</p>

Performance Objective - Enabling Smarter, Cleaner Markets

S/N	Ofgem Expectation	Success Measure	Comment
C1	Market design and operation encourages innovation and efficient market participation.	<ul style="list-style-type: none"> • Market liquidity (Settlement period average % over/undersupplied) - across all markets. • Average cost of NESO procurement. • Profile of provider types (inc new provider types). • BM registration timelines. 	<p>Expectation</p> <p>Given NESO's significant influence over market design, it is essential that it is held to the highest evidential standard when proposing or assessing market design changes. NESO must provide robust justification for the need, costs and benefits of any proposal, including a full value-for-money assessment that considers not only NESO's own resource requirements but also the impact on market participants, the wider industry, and any opportunity costs arising</p>

S/N	Ofgem Expectation	Success Measure	Comment
			<p>from diverting industry focus away from other potential market design improvements.</p> <p>In gathering evidence to support decisions, NESO must be unbiased and transparent with industry to ensure better outcomes for customers.</p>
C2	Market design and operation facilitates optimised system operability	<ul style="list-style-type: none"> • average £/MWh of markets • quality / coherence of market signals 	<p>Success Measure</p> <p>See response in B3 above discussing ex post evaluation of NESO's decisions. Such ex-post will help industry properly assess the quality and coherence of market signals.</p>

Performance Objective - Delivering a Decarbonised, Operable Grid

S/N	Ofgem Expectation	Success Measure	Comment
D1	Faster connection times, shorter queues, and lower administrative burden for prospective connectees to the electricity network	<ul style="list-style-type: none"> • Connections offer timing • Number of right-first-time connection offers • Shorter connection dates offered • Connections queue of G2 shorter / more aligned • Administrative burden of process • Connection Portal experience feedback. 	<p><u>Expectations</u></p> <p>Timeline for Connection Offers</p> <p>SSE agrees that connection offers must be bankable and deliverable. However, the new 7.5month timeframe for issuing offers—though justified for G2tWQ—will appear unnecessarily slow and inefficient on an enduring basis (especially relative to the pre-reform- process.)</p> <p>Alignment of Demand and Generation Connections</p> <p>For most users, the reliability of their connection date is critical. The onus should therefore be on accurate and robust connection offers that align with users' project timelines as far as possible. While progress</p>

S/N	Ofgem Expectation	Success Measure	Comment
			<p>has been made, further streamlining of processes is required, and careful consideration is needed to ensure the reformed connections process aligns effectively with wider market signals.</p> <p>For demand connections, it remains unclear to what extent the new demand queue will address existing challenges. However, it is essential that reforms try to reduce any potential distortions between the Transmission and Distribution systems,</p> <p><u>Smart Grid Offers</u></p> <p>Furthermore, NESO must ensure that it issues smart grid offers. For example, where available spare capacity is 90MW but a scheme is asking for 100MW, NESO must demonstrate smart thinking by optimising the plan, so schemes shift to fill in gaps or potentially lower TEC to get connected quicker (or staged TEC).</p> <p><u>Success measures</u></p> <p>As above, the focus should be on accuracy and not just timeliness. Users would appreciate connection offers within a reasonable timeframe but also in alignment with their project delivery dates.</p> <p>On shorter connection queue, the nature of the beast means the connections queue must be shorter and more aligned than it was pre-reform ('Gate 2 Strategic Alignment Criteria). The challenge is how many 'extra' projects the G2tWQ process will allow 'in'. Going forward, the reformed process doesn't allow 'extras' in unless there is a clear and separate need.</p>

S/N	Ofgem Expectation	Success Measure	Comment
			<p><u>Customer portal experience</u></p> <p>To gauge customer experience feedback on the portal its key that customers are given the opportunity to voice concerns – and this doesn't simply result in NESO collating customers' experience and presenting this back in a way that suits. There should be effective engagement with stakeholders to improve customer experience.</p>
D2	The electricity connection queue is actively and effectively managed.	<ul style="list-style-type: none"> Queue composition / size Milestone tracking. 	<p><u>Success Measures</u></p> <p>Post connections reform, we think it is right that NESO plays a more active role in managing the queue. It is important that this is sensitive to and cognisant of the real and practical challenges in delivering projects and we would argue this role needs to be both in terms of ensuring Users are progressing against their milestones, but also ensuring networks are progressing in line with delivering their side of the contract.</p>
D3	Deliver inputs to policy for low carbon developments	<ul style="list-style-type: none"> Quality of connected / connecting TSO engagements Quality and timely provision of modelling and expert insight. 	<p><u>Success Measures</u></p> <p>In assessing quality and timely provision of modelling and expert insight, NESO must show that its modelling process is transparent, seen to be unbiased, fully open and cooperative with industry. This is essential to enable effective peer review of NESO assessments and conclusions to reach better outcomes for customers.</p> <p>It is also important to identify any potential conflicts of interest within NESO so potential conflicts can be understood and managed in their roles as a "trusted independent expert". This is important to ensure that any potential cross-subsidy of cost, or risk between</p>

S/N	Ofgem Expectation	Success Measure	Comment
			different areas of NESO operation are fully transparent and in the best interest of the GB system and consumers.

Performance Objective: Driving Whole-System Resilience

S/N	Ofgem Expectation	Success Measure	Comment
E1	A system with maximum up time and capability to recover quickly from events.	<ul style="list-style-type: none"> • Hours unsupplied • Time to recover events • ESRS compliance & cost • Percentage System Availability 	<p><u>Success Measure</u></p> <p>It is important that NESO transparently consider and report on optimum system security given the associated costs and benefits, instead of maximum system security.</p> <p>For example, it may be possible to increase the utilisation of the existing network to reduce constraints costs and volumes and deliver more low carbon power to customers. This could be done by making greater use of inter-trips, reserve generation and other measures, enabling a reduced dependence on providing security by holding spare network capacity as a reserve of network.</p>
E2	NESO develops future resilience and restoration capability.	<ul style="list-style-type: none"> • De-rated margin forecasts • Loss of Load Expectation • Evidence of risk reduced • Number/priority of (NESO-led) mitigations actions. 	<p><u>Expectation</u></p> <p>We recommend stronger and more explicit consideration of operational cyber and physical resilience within this objective to ensure a comprehensive, accurate assessment of a real-time grid.</p> <p>We also welcome clearer articulation of the interface between NESO and TOs, particularly to avoid blurring accountability and duplicating responsibilities across emergency preparedness and resilience activities.</p>

			<p><u>Success Measure</u></p> <p>NESO should be required to explain how resilience risks and mitigation actions are prioritised, and provide clear justification where actions are delayed, deprioritised or not taken forward.</p> <p>NESO should also be expected to demonstrate effective coordination with other parties, with transparent reporting on where collaboration has been successful.</p> <p>There should be a success measure that requires NESO to carry out joint resilience exercises with TOs and ensure that lessons learned translate into tangible industry mitigations.</p>
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Performance Objective: Building a Digitally Connected Energy System

S/N	Ofgem Expectation	Success Measure	Comment
F1	NESO and industry have access to complete, usable, useful data.	<ul style="list-style-type: none"> • Number of data requests • Number of requests met • Number of reduced manual data intake • Number of users • Demand Forecasting Accuracy • Wind Forecasting Accuracy • Number of additional data sets provided. 	<p><u>Success Measures</u></p> <p>To strengthen the effectiveness of the success measures, NESO should be required to maintain an up-to-date public register of all data requests submitted by industry. This register should specify the nature of each request — including any relevant temporal, locational or asset-level detail — and set out NESO's response, including whether the data is already available, plans to provide or improve it, or the rationale for not providing it.</p>

S/N	Ofgem Expectation	Success Measure	Comment
			<p>The register should also record and justify any rejected requests.</p> <p>In addition, NESO should establish a single point of contact for submitting data requests, enabling clearer tracking and ensuring the register remains accurate and complete.</p>
F2	Secure and standardised data exchange is established.	<ul style="list-style-type: none"> • Number of reduced data interfaces • Percentage of time data is available to industry • Average time/experience of onboarding to DSI • Number of uses 	<p><u>Expectation</u></p> <p>As an ongoing participant of the Data Sharing Infrastructure programme, initially participating at pilot phase and now MVP, we are supportive of this Performance Objective to ensure continued momentum and transparency via the outlined success metrics. The current roadmap for DSI is ambitious and performance objectives are useful in assessing the wider value to industry participants, as well as underpinning NESO's role as coordinator and governor of the DSI.</p>
F3	As a digital leader in the industry, NESO progresses its own and sector digitalisation	<ul style="list-style-type: none"> • Average time to remedy user/usability errors • Uptime of services • Timely delivery of quality digital products • Number of industry interfaces in a digital fashion. 	

Performance Objective: Provide Customers with a High-quality, Independent and Trusted Service

Q14. Do you agree with our proposal to include this additional Performance Objective for NESO?

We agree with the inclusion of the additional Performance Objective, as it captures crosscutting stakeholder experience, reinforces trust and consistency, and supports standardised engagement necessary for industry participants to meet their licence obligations.

Q15. Do you agree that the outcomes proposed under this Performance Objective are clear and comprehensive? Please provide any views for additional outcomes, if appropriate.

S/N	Ofgem Expectation	Success Measure	Comment
G1	NESO has a high degree of stakeholder and customer trust.	<ul style="list-style-type: none"> • Development of a Customer Trust Index • Stakeholder feedback 	Success Factors Developing a Customer Trust Index will be useful. This should include specific questions covering different aspects of NESO's functions. We also look forward to seeing how the ICP's feedback will be assessed against feedback gathered by NESO more widely.
G2	NESO's plans and strategies provide certainty to stakeholders and ensure NESO can be held to account for quality and efficiency of delivery	<ul style="list-style-type: none"> • Timeliness and quality of NESO Strategy / Strategic Aims Publication – expected by end 2026 • Timeliness of NESO Business Plan publication • Quality of regulatory outcome in Business Plan • Stakeholder feedback • NESO evidence of (broad and timely) stakeholder engagement and having accounted for stakeholder views. 	Success Factors SSE agrees that robust stakeholder feedback is essential for assessing NESO's performance. It is important that NESO provides meaningful opportunities for stakeholders to share their views and clearly demonstrates how this feedback has influenced its decisions. A transparent feedback loop will help ensure stakeholders can engage effectively and provide the support NESO needs to deliver its objectives.
G3	Improved NESO decision making transparency	<ul style="list-style-type: none"> • Number of key milestones in published plans missed without forward communication to stakeholders 	Expectations In reviewing NESO's decisions, there should be a structured ex-post assessment comparing the costs and benefits of NESO's chosen actions with those of a credible, more optimised alternative. This assessment should consider both cost and

S/N	Ofgem Expectation	Success Measure	Comment
		<ul style="list-style-type: none"> Number of key milestones in published plans delayed. 	<p>value, aiming to deliver the best overall outcome rather than simply the lowest cost.</p> <p>This approach helps avoid under-delivery that diminishes system value, as well as excessive spending that yields limited benefit. NESO should also take account of the broader cost implications for the GB energy system, including impacts and risks borne by other parties.</p>
G4	NESO provides a quality, independent role as a Code Administrator for the codes it governs.	<ul style="list-style-type: none"> CaCOP surveys Stakeholder evidence Evidence of SDS prioritisation / alignment 	<p>Success Measure</p> <p>It is important to monitor performance of NESO engagement in the industry code change process in at least three areas:</p> <ul style="list-style-type: none"> <u>NESO Code Administration function:</u> NESO must ensure that the code administration function remains independent and not overly reliant on advice and direction of the NESO Code team. <u>NESO Commercial Codes/market design subject matter experts –</u> NESO should continue to ensure that this role is carried out in a way that supports the interests of the wider industry and reinforces the independence of the market design function. <u>NESO service subject matter experts -</u> NESO's subject matter experts bring valuable expertise, tools and resources to the industry code process. To maximise the benefit of this capability for all stakeholders, it would be helpful for NESO to ensure that this support is provided consistently and transparently across all code change proposals. A

S/N	Ofgem Expectation	Success Measure	Comment
			uniform, neutral and proactive approach can strengthen confidence in NESO's independence and enhance outcomes for both the system and consumers.

Value for Money

Q17. Do you agree with our approach of requiring additional Value for Money reporting until sufficient information is provided by NESO such that we can perform a Value for Money assessment of this plan?

We agree with Ofgem's proposal to require additional reporting until NESO provides the information needed to complete a full assessment of the draft plan. As noted throughout our response, NESO must ensure that its approach to value for money does not become a narrow focus on cost reduction. Instead, NESO should demonstrate that its decisions deliver the greatest overall benefit to end consumers, rather than the lowest cost alone.

Reporting requirements

Q18. Do you agree that NESO should continue to report against these metrics?

We agree NESO should continue reporting against these metrics, reflecting its central role in the GB energy system and the importance of consistent evaluation to support transparency, trust and independence.

Q19. Are there any additional metrics you would like NESO to regularly report against?

In addition to the proposals highlighted in comments above on success measures above, we recommend additional reporting on the following:

- Constraint cost breakdowns across all SSENT boundaries as it is useful in highlighting the cost impact of Project outages to NESO, and ultimately the costs paid by end-consumers.
- NESO turnaround times for in year TO outage requests. This will highlight performance of the NESO NAP teams in responding to changes in the outage plan within year (slow NESO responses leave the TOs with high costs for aborted work or minimise chances to optimise outage plans and develop 11-4 schemes).
- The speed and effectiveness of NESO communications and escalation during resilience related incidents. This would allow TOs such as SSENT to better optimise outage plans to minimise constraint costs. It would also help TOs develop more smart solutions in line with STCP11-4 to drive reduced constraint impact.

- Notification periods for users impacted by outages.

Q20. Do you agree with the proposed level of innovation funding for NESO?

We do not have any concerns with the proposed level of innovation funding but consider NESO projects should be assessed consistently with other network projects to ensure they are genuinely innovative and deliver clear consumer benefit.