



Making a positive difference
for energy consumers

To: distribution network and
system operators, flexibility
providers, generators and other
interested parties

Date: 13 May 2026

Dear Stakeholders,

Formal Approval of Extension (Derogation) for Stage 2 Future Year Models and the Stage 3 Production Deadline in the Long Term Development Statement (LTDS).

The purpose of this derogation extension letter is to confirm and formally approve the request submitted by the Energy Networks Association (ENA), on behalf of the DNOs, on 23 April 2026. The request relates to the implementation of certain Common Information Model (CIM) requirements in the Form of Long Term Development Statement (FoS)¹ – see Appendix attached to this letter for this derogation extension request letter submitted to Ofgem.

Pursuant to Standard Licence Condition 25.2 of the standard conditions of the Electricity Distribution Licence², and the Direction issued by the Authority³ on 30 April 2024 under that condition, Ofgem may specify the form of the LTDS and set revised publication dates and Grid Modelling Data Result deadlines where a licensee has notified Ofgem that it cannot meet the relevant date or deadline. The 30 April 2024 Direction requires licensees to use best endeavours to meet the publication dates in section 9.1 of the FoS and to produce each Grid Modelling Data Result by the relevant deadline in Table 7 of section 9.2. It also provides that, following notification by a licensee and any further information requested by Ofgem, the Authority will set a revised publication date and/or deadline, taking reasonable account of the circumstances. On that basis, and having considered the DNOs' request of 23 April 2026, this letter confirms Ofgem's decision on the requested changes to the Stage 2 and Stage 3 LTDS CIM requirements.

¹ [Form of Long Term Development Statement 300424.pdf](#)

² [Electricity licensing \(from October 2025\) - Publications - Ofgem Public Register](#)

³ [LTDS Direction 300424.pdf](#)

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This letter approves the request for DNOs to provide one future-year Equipment (EQ) and System Capacity (SYSCAP) model (at Stage 2 of the most recent FoS derogation letter ⁴), with the remaining future-year models for years 2 to 5 deferred to Stage 3; the proposed movement of short-circuit results from SYSCAP to a dedicated Short Circuit Result (SCR) profile; the proposed movement of connections activity reporting into the Capacity Heatmap; and deferral of the Stage 3 production deadline from 15 August 2026 to 15 October 2026. It also approves the request to move the Stage 3 production deadline from 15 August 2026 to 15 October 2026. Lastly, it approves that the GB CIM Engagement Hub, hosted by BSI⁵, should be used to support the development, maintenance and version control of LTDS CIM technical artefacts, including current versions and version history.

However, following Stage 2 publication on 29 May 2026, in line with this derogation approval letter, DNOs are expected to undertake stakeholder engagement to test the validity of the assumptions underpinning the approved Stage 2 changes. This engagement should also be used to identify any material unintended consequences, assess their significance, and determine proportionate mitigations where needed.

The LTDS¹ is a long-standing obligation on DNOs, mandated through a direction under paragraph 25.2 of the Electricity Distribution Licence, and is intended to describe the characteristics and development of GB electricity distribution networks for the benefit of users.

The revised FoS⁶ introduced a phased implementation programme for new CIM-based grid modelling outputs and standardised Capacity Heatmap data, with the aim of improving the consistency, accessibility and usability of network information following the Data Best Practice (DBP) Principles.

Response to requested Stage 2 changes

This letter approves the request to alter four deliverables associated with the LTDS Stage 2 publication. These approved changes are as follows:

⁴ [LTDS CIM Heatmap Extension \(Derogation\) Letter.pdf](#)

⁵ [Homepage - GB CIM Engagement Hub](#)

⁶ [LTDS Direction Letter 300424.pdf](#)

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- Provision of one future-year EQ and SYSCAP model at Stage 2, with the remaining future-year models for years 2 to 5 deferred to Stage 3.
- The proposed movement of short-circuit results from SYSCAP to a dedicated Short Circuit Result (SCR) profile.
- The proposed movement of connections activity reporting into the Capacity Heatmap.
- Deferral of the Stage 3 production deadline from 15 August 2026 to 15 October 2026.

We recognise that implementation of LTDS CIM is complex. It depends on data preparation, technical artefacts, software tooling, interoperability validation and governance arrangements. We also recognise that users will only benefit from the LTDS reforms where the outputs are reliable, interpretable and useful. Publishing future-year models before the relevant inputs and assumptions are sufficiently mature may reduce confidence in the LTDS and may risk giving users a misleading impression of the certainty or completeness of the data.

We have considered the DNOs' request against the purpose of the LTDS, the need to protect user value, the need to maintain consistency between DNO outputs, and the importance of avoiding unnecessary delay to the benefits of the reforms.

We agree that providing one future-year EQ and SYSCAP model at Stage 2, with years 2 to 5 deferred to Stage 3, is a proportionate sequencing change. This approval preserves the requirement to provide future-year models but reduces the risk that Stage 2 outputs appear more complete or certain than the underlying data supports. It should allow users to receive a credible Stage 2 output while retaining the full future-year requirement for Stage 3. We note the intention of DNOs to provide a richer source of data within the future-year EQ profile, and we are assured that the proposal enhances, rather than diminishes, the quality of the published profile.

We also agree that moving the Stage 3 production deadline from 15 August 2026 to 15 October 2026 is merited. This remains consistent with Stage 1 and 2 timings between production and submission and gives DNOs sufficient time to complete the proposed stakeholder engagement detailed below. However, this approval is limited to the production deadline. At this stage we consider that the Stage 3 publication deadline should remain at 30 November 2026. The DNOs remain responsible for ensuring that the

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revised production timetable allows sufficient validation before publication, including interoperability testing.

We agree with the proposed request to move short-circuit results from SYSCAP to a dedicated SCR profile. We also agree with the proposed movement of connections activity reporting from SYSCAP to the Capacity Heatmap. To ensure that these proposed changes deliver value to stakeholders we do require DNOs to retrospectively validate the benefits through suitable stakeholder engagement. The details of this requirement are described further in the stakeholder engagement section of this response.

Stage 3 discussion points and stakeholder engagement requirements

We welcome DNOs providing an indication of the Stage 3 deliverables which they believe may be problematic, as this provides stakeholders with an early insight into possible future changes.

In support of any future derogation requests DNOs should seek stakeholder views to provide supporting evidence for any proposed changes to the Stage 3 requirements. We expect DNOs to use best endeavours to engage stakeholders to validate:

- That the changes approved to the Stage 2 publications as part of this approval were appropriate, ensuring that information related to fault level and connections activity information is adequately reflected in the SCR and heatmap respectively.
- That any changes proposed to Stage 3 publications are aligned with stakeholders' requirements to ensure that the need for change is justified, and any alternative proposed solutions do not diminish the usefulness of the Stage 3 publication.

The stakeholder engagement should include users of LTDS data, the GB CIM Advisory Group under the BSI governance arrangements, relevant technical stakeholders, and stakeholders affected by changes to the location, structure, interpretation or comparability of LTDS data.

There should be at least two stages of engagement for both Stage 2 derogation changes and stage 3 issues. The first stage should test assumptions, gather evidence, understand user needs, identify risks and explore options. For Stage 2 changes approved, this will be focused on validating assumptions and surfacing any oversight or risks. However, Stage 3

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issues should be framed as evidence gathering and option development and options assessment not as consultation on a settled DNO position.

Following that engagement, the DNOs should hold a further session to present the feedback received and the position they propose to take forward. That session should include a summary of responses, categorised by agreement, disagreement, partial agreement, alternative proposals and other material issues. The DNOs should explain the reasons given by stakeholders, the feedback they propose to take forward, the feedback they do not propose to take forward, and why.

If, after this process, the DNOs consider that a further derogation is required, any request should explain how the engagement and other credible and balanced evidence have informed the proposed position. It should also explain the expected impact on security, users, data quality, comparability, delivery timelines and the purpose of the LTDS reforms.

The engagement should be planned and delivered in reasonable time so that it does not affect the revised Stage 3 production deadline, the Stage 3 publication deadline, or delivery of the Stage 2 future-year models and other Stage 2 deferred requirements to Stage 3 by this letter. The need to complete engagement alone will not justify delay to the Stage 3 production or publication timetable.

GB CIM Governance Model

We also acknowledge and agree with the position set out in Section 3 of the ENA's letter attached regarding governance of LTDS CIM supporting artefacts. We confirm that the GB CIM Engagement Hub, hosted and managed by the British Standards Institute (BSI), is the official location of record for LTDS data-exchange definition artefacts, including the documents, spreadsheets, information models, profiles, APIs and constraint descriptions referred to in the FoS as Annexes and Appendices and listed as Subsidiary Documents on the Ofgem LTDS page⁷.

Importantly, this agreement does not transfer regulatory responsibility away from Ofgem. This agreement does not extend to the FoS, derogation letters or direction of the LTDS letters or policy and regulatory intent, which will remain under the governance and control of Ofgem, and any proposed changes to these must continue to be submitted directly to Ofgem for consideration. We also confirm that changes to these supporting LTDS CIM

⁷ [Long Term Development Statement direction | Ofgem](#)

artefacts will be progressed through the BSI governance process including its Advisory Group.

The LTDS CIM Annexes and Appendices comprise complex, evolving technical artefacts (including schemas, profiles, APIs and constraints) that require specialist technical governance, version control and structured stakeholder input to ensure interoperability, consistency and usability across the industry. The GB CIM Engagement Hub, hosted by the BSI, provides an established and transparent industry governance environment specifically designed for this purpose, including formal change control, expert advisory input and an auditable version history.

Placing these artefacts under BSI governance reduces delivery and assurance risks by enabling timely, coordinated updates to technical structures and formats without requiring repeated regulatory decisions, while avoiding fragmentation or uncertainty over the authoritative version of LTDS CIM artefacts. It also aligns LTDS CIM arrangements with wider GB and international CIM governance practices.

This approach provides a clear, proportionate and established governance framework for the development and maintenance of technically detailed LTDS CIM supporting artefacts, while preserving Ofgem's regulatory oversight of policy intent, licence obligations and the Form of Statement (FoS). The BSI governance route applies only to supporting technical artefacts and is intended to facilitate effective implementation, not to alter regulatory obligations or data content requirements.

Summary

When Ofgem issued the LTDS Direction in April 2024, it required DNOs to use best endeavours to meet the relevant publication dates and Grid Modelling Data Result deadlines, while also providing a process for DNOs to notify Ofgem where those deadlines could not be met.

Ofgem has already used that process to approve targeted LTDS derogations where it was justified, pursuant to Section 25.2. This was done to manage implementation risks in a controlled way, first by approving a one-year extension to the Stage 1.3, Stage 2 and Stage 3 CIM deadlines where governance, software-readiness and technical delivery issues made the original timetable impractical, and then by approving the associated Capacity Heatmap extension 3 because that output depends on the completed EQ profile.

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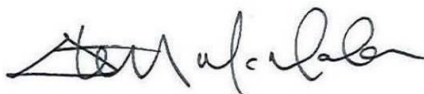
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This request should be considered in that same implementation context. It is not intended to dilute the LTDS reforms, but to ensure that Stage 2 delivery produces outputs that are credible, usable and capable of meeting stakeholder needs. As the CIM implementation moves from design into delivery, it is appropriate to test whether some assumptions in the FoS remain the best way to deliver user value, while preserving the overall purpose of the reforms and maintaining transparent regulatory oversight.

Nothing in this letter waives, varies or reduces any licence obligation, direction requirement or FoS requirement except to the extent expressly approved in this letter. This decision is specific to the DNOs' request dated 23 April 2026 and the evidence provided in support of that request. It does not create a general relaxation of LTDS requirements and does not establish a precedent for future derogation requests.

The DNOs should proceed with Stage 2 delivery in accordance with this decision and develop the stakeholder engagement described above in sufficient time to support Stage 3 delivery. Any further request should be supported by a clear evidence base, including the engagement process followed, the responses received, the DNOs' assessment of those responses, and the reasons for the proposed approach.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Steve McMahon', written in a cursive style.

Steve McMahon

Director, Network Price Controls

Liam Bennett
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Sent by email: Liam.Bennett@ofgem.gov.uk

23 April 2026

Dear Liam,

CIM LTDS Stage 2 – Derogation Request

We are writing on behalf of the Distribution Network Operators (DNOs) regarding the Stage 2 and Stage 3 LTDS deliverables as set out in the Form of Long-Term Development Statement (FoS), dated 30th April 2024.

This letter is structured in three sections:

- 1) Proposals, primarily related to Stage 2, which require a derogation to the FoS, dated 30th April 2024. We are notifying Ofgem at least 28 days in advance of the relevant publication date/deadline. This letter provides details of the reasons why the Licensees believe we will not be able to meet the publication date set out in the FoS. The reasons for the change are set out in section 1 of this letter.
- 2) Items included in Stage 3, which the LTDS CIM Working Group (The Group) has identified may need further consideration. Through this letter The Group would like to provide early visibility of these items, without yet being in a position to propose a recommended alternative option. Through stakeholder engagement the alternative options will be explored and, if changes are required to the delivery timescales or scope of Stage 3, a more detailed proposal will be submitted for Ofgem's consideration.
- 3) Updates required to the FoS Annexes and Appendices are considered by DNOs to fall under the jurisdiction of the British Standards Institution (BSI) governance of Great Britain Common Information Model (GB CIM). Our rationale is set out in this section, and we seek confirmation of Ofgem's agreement to this change of jurisdiction.

Section 1: Proposals requiring a derogation

Changes to the Stage 2 requirements are proposed in order to:

- Provide more useable, better structured data to LTDS data consumers, and
- Enable the DNOs to complete their required work in a more orderly, effective and efficient manner

There is some uncertainty on the powers that Ofgem would use to derogate from the scope of the deliverable, but all DNOs are clear on the powers that Ofgem would use to derogate from the delivery dates. If Ofgem is comfortable that it has powers to derogate on the scope as well as on the delivery dates, we request that the logic for this is set out in any derogation letter Ofgem issues.

If Ofgem identifies that it can only derogate on the delivery dates, we believe the way forward would be to derogate all elements set out in Section 1 on that basis, with a parallel piece of work commenced with the DNOs to update the FoS to change the scope accordingly before the end of the derogation.

The proposed changes are as follows:

1. Provision of one Future Year EQ and SYSCAP Model in Stage 2, with the remaining Future EQ and SYSCAP models (years 2–5) being deferred until the November 2026 publication (Stage 3).

Justification:

- DNOs will produce comprehensive future models that incorporate all planned network changes, including generation connections, development projects, reinforcements, and asset upgrades. In contrast, the original LTDS requirement called for simpler, less complete Future EQ models which included descriptions of far fewer future changes. This new approach provides LTDS users with a richer source of information but represents additional effort beyond the original Stage 2 phased implementation plan.
- Completing all five future years in May 2026 would require substantial additional data population work and will rely on highly uncertain connections data due to the ongoing Connections Reform. The current generation connections queue is under review and outcomes will not be available in time for May, meaning publishing all five future-year models would be misleading.

- Providing a complete first future year in May, followed by four years of more complete models in November, will allow DNOs and vendors to demonstrate their ability to produce data in the required format while also allowing DNOs the time to focus on accurately populating future data in their planning tools.

FoS interpretation:

The requirement for five future models is found in Section 9.2 Grid Modelling Solution Development Stages of the FoS under Table 7 – Grid Modelling Data Result Deadlines. This request is for a derogation to the provision of future year models 2-5 until the Stage 3 publication in November 2026.

2. Move short-circuit results from SYSCAP to a newly created SCR profile.

Justification:

- During the Stage 2 review, The Group identified an opportunity to provide fault level data in a structure more aligned with general CIM modelling practice. The view of The Group, including the CIM technical experts supporting The Group, is that moving fault level data out of the SYSCAP profile to a dedicated Short Circuit Result (SCR) profile provides a more robust and precise solution. The development of the SCR profile will be of interest to the international CIM standards body.

FoS interpretation:

In Section 2.1 of Section 9.2 Grid Modelling Solution Development Stages of the FoS, the SYSCAP profile is referenced as containing “fault level information”. This request is to seek a derogation to the requirement to include fault level information within the SYSCAP profile. The information will still be shared with LTDS users, but this derogation changes the mechanism through which the information is shared to a newly created SCR profile.

3. Move connections activity reporting out of the SYSCAP profile into the LTDS Heatmap.

Justification:

- Connection activity data aligns more closely with the intent of the Capacity Heatmaps, that being to provide general, high-level information of interest to potential connection requestors, rather than with the intent of the LTDS Grid Modelling, which seeks to provide grid detail sufficient to support grid analysis.

FoS interpretation:

Section 1.2.4 Grid Modelling Section Content of the FoS lists “connection interest/activity” as one of the items to be provided at the bus level. This derogation is sought to move connections activity reporting out of the SYSCAP profile and into Section 1.2.5 Capacity Heatmaps Section Content.

A change to the timelines associated with the production of Stage 3 is included within this letter, which is as follows:

4. Defer the Production deadline for Stage 3 from 15 August 2026 to 15 October 2026

Justification:

- The rationale for this derogation is to align with the approach taken for both Stage 1.3 and Stage 2, where production of files was required by the middle of the month prior to publication. This approach has been proven to work for Stage 1.3 and provides a good balance of early visibility for Ofgem, whilst maximising the time available for the LTDS CIM Working Group, in collaboration with the BSI, to refine the LTDS CIM schema and for the DNOs, assisted by their vendors, to implement the required data exports.

FoS interpretation:

The Formal Approval of Extension (Derogation) for CIM Implementation in the Long-Term Development Statement letter states, in Appendix 1, that Stage 3 has a Production deadline of 15 August 2026. This derogation seeks to move that date to 15 October 2026.

Section 2: Stage 3 deliverables which require further consideration

The Group have identified some requirements of Stage 3 which may benefit from modification, but which The Group is not currently in a position to suggest realistic alternatives to. These requirements are highlighted below, and The Group’s intention is to seek the views of stakeholders to help inform the identification of suitable alternative solutions.

The Stage 3 deliverables The Group wish to consider further are:

1. Security concerns have been raised regarding the provision of geographical location information for grid elements. The Group would like to explore how to balance the provision of information to interested parties whilst ensuring the security of critical infrastructure.

FoS interpretation:

Section 2 Summary Information specifies that “The approximate locations of 132kV and EHV circuits... are shown on geographic plan(s)” and Section 5.3 LTDS in CIM calls for “geo location” to be provided for a range of grid components, including “Circuits” and other components that potentially could be located on circuits.

2. Provision of development proposal information is currently required in the form of Difference Models. The Group would like to consider this requirement to ensure that what’s delivered maximises usefulness for consumers, avoids potential duplication of data with other Future EQ models, and isn’t reliant on systems’ readiness to consume or produce such models at this stage.

FoS interpretation:

Section 5.3 LTDS in CIM calls for “Difference Models of all firm future development projects anticipated to complete in the next 5 years.” and it says, “Future firm development projects are required to be represented as CIM Difference Models.” Section 9.1 Summary identifies the schedule for publication of “Difference Models for all firm development projects.”. Section 9.2 Grid Modelling Solution Development Stages calls for “licensee grid development projects as Difference Models” as a Stage 3 deliverable and states that “CIM Difference Models for all firm development projects (where finance has been secured).” should be produced.

3. The Group wishes to consider the publication frequency of the LTDS to ensure that publication dates, and the requirements of those publications, align with the availability of data that supports development of the LTDS model. This rationale may give rise to a request to change the requirements to call for one publication of specific LTDS data in November and other LTDS data in May.

FoS interpretation:

The subsection titled Grid Modelling and Capacity Heatmaps of Section 7.2 Frequency of Update and Availability, states that “These sections of the Statement are each to be refreshed and published on a bi-annual basis, on or before the 31st of May and the 30th of November annually.”

4. Deferral of the Publication of the NETS minimum demand “solved case” is reliant on data provision from NESO. The responsibility for NESO to notify DNOs of the time of the NETS minimum demand will be established under changes to the Planning Code as a result of Grid Code Modification GC0139. The dependency on NESO may give rise to a request to move that requirement for the ‘NETS minimum solved case’ to fall in line with GC0139 timescales.

FoS interpretation:

The Formal Approval of Extension (Derogation) for CIM Implementation in the Long-Term Development Statement letter states, in Appendix 1, that “Solved cases” are to be delivered as a part of Stage 3 which has a publication deadline of 29 November 2026.

Section 3: Issues to be managed independently of Ofgem through BSI Governance

The third section of this letter asks Ofgem to acknowledge that the [GB CIM Engagement Hub](#), hosted and managed by the BSI, is the official location of record for all LTDS data-exchange definition artefacts. Specifically, these are the documents, spreadsheets, information model, profile, API, and constraint descriptions listed as Subsidiary Documents on the Ofgem [Long Term Development Statement direction](#) website, referred to in the FoS as ‘Annexes and Appendices’. It does not include the FoS document, which remains under the control of Ofgem and any proposed changes to its requirements will continue to be submitted directly to Ofgem.

The most current versions of these supporting annexes and appendices are hosted on the [GB CIM Engagement Hub](#). The Group also seeks confirmation that all changes to these artefacts are controlled through the BSI governance process, rather than via Ofgem letters. Modifications made through the BSI route relate primarily to the format and structure in which data is provided not the content of the data provided. Examples of the changes which will fall under BSI’s jurisdiction are included within the appendix to this letter.

We trust that these acknowledgments and clarifications will support a more effective and useful LTDS implementation across the industry. We also look forward to Ofgem’s response.

Yours sincerely



Paul McGimpsey
Director of Markets and Regulation

On behalf of:
National Grid Electricity Distribution

Northern Powergrid
Scottish and Southern Electricity Networks
SP Electricity North West
SP Energy Networks
UK Power Networks

Appendix. Data Exchange Definition Artefact Modifications made under BSI governance process

| Point | What it is | Justifications | FoS Impact | WG Interpretation for FoS |
|--|---|---|--|---|
| Point 1: Aggregated Generation Categories | Proposal to allow aggregation using technology-type classes (synchronous / inverter-based) instead of FoS Table 5 fuel types. | The three categories capture the key technical distinction required at this voltage level, particularly short-circuit contribution (inverter-based versus rotating machines). The impact of detailed fuel-type production patterns at these lower voltage levels is typically limited, and generic assumptions are sufficient. | No FoS requirement is impacted. (Note: Table 5 in FoS is legacy LTDS, not the CIM-LTDS requirement) | Grid Modelling Guidelines (GMG) determines modelling detail. FoS wording “may be aggregated” provides flexibility. Fully within BSI governance. |
| Point 2: Representative Feeder Breaker | Removal of the “representative feeder breaker” modelling element. | These breakers are outside the stated LTDS scope (“..detailed information is provided for 132kV networks (EHV in Scotland) to the lower voltage busbars of primary substations but includes details of any interconnectors at lower voltages that are needed to assess the capability of the higher voltage networks.” Per Section 1.2.2 Detailed Information Section Content of FoS). Information about them should not be required. | None. | GMG modelling matter. |
| Point 5: ECR Linking of Future Connectivity Nodes | Model accepted-to-connect generation as part of the LTDS grid model, rather than a link via the ECR | Including future generation directly in planning models provides more detail than required by 2024 LTDS, improving usefulness, completeness and integrity | FoS Stage 2 requires ConnectivityNodes to which the ECR could link to exist and they will. | The modelling rules fall under GMG/BSI governance, and ECR updates are outside the WG’s remit. |
| Point 11: Storage capacity of storage connections | Exclude storage capacity of storage connections | Storage connection capacity is not required for LTDS purposes and omitting it simplifies reporting without reducing model integrity. | None. | GMG modelling update. |
| Point 12: Shunt Capacitor Control Modelling | Exclude controls modelling for shunt capacitors. | Modelling shunt capacitor controls is unnecessary for LTDS outputs and does not impact published model usefulness or compliance. | None. | GMG modelling update. |

| Point | What it is | Justifications | FoS Impact | WG Interpretation for FoS |
|---|--|---|--|---|
| Point 13: Single-Customer Confidentiality Text | Remove FoS statement regarding single-customer forecast loadings. | The statement contradicts S105 Utilities Act guidance; removing it ensures consistency with regulatory requirements and avoids confusion. | Statement should be removed from legacy Table 3 Notes, but this is outside the LTDS CIM WG remit to request. | GMG modelling update. |
| New point CH-1: Substation mRID persistence | Defer requirement for persistency until November 2026 | Persistent mRIDs will not be available from LTDS grid model until November 2026 | None | Requirement sits in Appendices, not in FoS. |
| New point CH-3: Firm capacity not provided for GSP Substations | Do not require reporting of demandFirmCapacity, demandAvailableCapacity, demandConstraint, demandConstraintLimitingFactor, generationFirmCapacity, generationAvailableCapacity, generationConstraint, generationConstraintLimitingFactor for GSP substations | DNOs cannot accurately calculate these values because information about assets not owned by the DNO is required | None | Requirement sits in Appendices, not in FoS. |
| New point CH-4: Demand percentile values not supplied | Defer reporting of demand percentile values until comprehensive review of Capacity Heatmap data is complete | DNOs do not have these values and question their value to data consumers | None | Requirement sits in Appendices, not in FoS. |