Summary of Call for Input Responses: Demand Connections Reform

Publication date:	16 June 2026
Contact:	Lauren Bald / Liam King
Team:	Strategic Demand Connections
Email:	connections@ofgem.gov.uk

In March 2026, we published a Call for Input setting out our current approach to demand connections reform and the direction of our regulatory response.[1] We launched this review to address a multifaceted challenge caused by a sharp rise in demand projects seeking connection, particularly data centres. Many of these projects are unlikely to progress, contributing to a congested queue that delays viable projects, including: projects designated by government as strategically important and able to deliver significant economic and social value and well-progressed projects.

We invited stakeholders to provide views on options to reform demand connections. This focused on strengthening commitment and readiness requirements for demand projects, along with measures to accelerate and increase the number of connections, while maintaining a secure system. Although responsibility for prioritisation mechanisms for strategically important projects sits with government, stakeholders also provided views on how this objective could be achieved.

We received 120 responses. This publication presents a summary of responses, our analysis of the key themes raised, and Ofgem's initial views on how we will proceed in several policy areas. These reflect current thinking rather than final policy decisions, and we will continue refining our approach through upcoming consultations.

[1] References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work.

Summary of Call for Input Responses: Demand Connections Reform

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Executive summary

This document summarises stakeholder responses to our Call for Input on demand connections reform and sets out our initial views on the feedback received, including how this feedback has informed our emerging policy thinking ahead of forthcoming consultations. These views reflect our current thinking rather than final policy decisions. We received 120 responses from a range of stakeholders.

The Call for Input was published on 13 February 2026 and closed on 13 March 2026. We invited stakeholders' views and evidence on measures under the Curate and Connect pillars. Government leads on the Plan pillar, which is focused on enabling timely connections for strategically important demand projects. Although we did not expressly seek views on the Plan pillar, respondents nonetheless provided relevant feedback. For transparency, those responses are also summarised in this document.

Key Response themes by Pillar

Curate – financial mechanism

- A majority of respondents supported introducing a financial mechanism (76 respondents). Support was strongest for Option 1b (incremental refundable deposit), and Option 2 (Progression Commitment Fee (PCF) style model). Option 3 (non-refundable fee) received the least support.
- Respondents highlighted any mechanism should be proportionate, avoid creating disproportionate barriers to entry, and should not duplicate existing securities. Some also supported alignment with CMP417. CMP417 is a code modification that seeks to extend the principles of CUSC Section 15 'User Commitment Methodology' to Users on Final Sums Methodology, resulting in all Users being on the User Commitment Methodology.
- **Our initial view**: Option 3 provides weaker incentives than the other options and is not being taken forward, while further work is being undertaken to understand the interaction with securities.

Curate – strengthened readiness and progression requirements

- A majority of respondents supported strengthened readiness and progression requirements (86 respondents).
- Planning consent was widely discussed, with greater support for outline than full consent, and some respondents favoured prioritising hybrid or co-located projects for their system value.
- **Our initial view**: we are not progressing changes to Gate 2 readiness requirements and instead are developing milestone-based checks, applied consistently across transmission and distribution; we do not propose to make changes to the existing requirements around outline or full planning consent.

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Plan

- Respondents broadly supported clearer, more strategic prioritisation of demand projects, including using Planning and Infrastructure Act 2025 powers to accelerate delivery where existing processes are too slow. In practice this means that the power can be used to amend licences, codes, methodologies and connection agreements.
- Concerns were raised that auctions could favour ability to pay over readiness or wider system value.
- **Our initial view**: By leading on the Plan pillar, it is primarily for government to consider these issues and determine how policies should evolve, with Ofgem continuing to support this work.

Connect – accelerate demand connections

- A majority of respondents supported introducing self-build and ownership arrangements (72 respondents). Supporters viewed self-build as a way to accelerate connections but stressed it should only be used where appropriate and supported by clear arrangements.
- Some respondents supported clarifying high voltage asset ownership under the Electricity Act 1989.
- **Our initial view**: 'Connect Update: Demand Connections Reform', published alongside this document, sets out details of how we are going to enable greater self-build in response to this feedback, including our plans to consult on the detailed measures in the Autumn.

Connect – enabling flexible connections

- A majority of respondents supported demand-led flexibility agreements (61 respondents).
- Some respondents supported non-firm and phased (ramped) agreements to enable earlier energisation and faster connections, provided they include clear and standardised terms.
- **Our initial view**: 'Connect Update: Demand Connections Reform', published alongside this document, sets out the details of how we are going to continue to explore the options for alternative connection arrangements with a focus on evidence gathering and expanding stakeholder engagement.

Next steps

- **Curate**: We will continue to refine our Curate proposals through the upcoming Curate consultation, which we intend to publish in the coming weeks. This consultation will set out a detailed analysis of the financial mechanism and readiness milestone options under consideration, including a description of

proposed policy elements and their implementation. It will seek stakeholder views to inform further development, in advance of decisions later in 2026.

- **Plan**: We note that the government's consultation response is expected in due course.
- **Connect**: As set out in 'Connect Update: Demand Connections Reform', published alongside this document, we aim to consult on several policies in Autumn 2026.

1. Introduction

Our Call for Input set out our approach to reforming demand connections, in response to the sharp rise in demand projects seeking connection, particularly data centres. This section briefly revisits the problem statement under consideration, outlines the three pillars underpinning the reform programme, and provides a summary of the number and types of respondents. In total, we received 120 responses to the Call for Input.

Background

1.1 Our Call for Input set out Ofgem's initial approach to reforming demand connections in response to the surge in demand connection applications between November 2024 and June 2025, driven particularly by rapid growth in data centre demand. The National Energy System Operator (NESO)'s high level summary of its Demand Call for Input highlighted that data centres accounted for over half of responses, both by number and by capacity, underlining the strength of connection interest from this sector.

1.2 Against this backdrop, the demand connections process is currently facing three interrelated challenges:

1. The demand queue is large and growing and includes a significant number of projects that will likely not progress to connection. While the transmission queue has closed as part of connections reform and the Gate 2 to Whole Queue exercise, the distribution queue has not generally closed in the same way. However, larger distribution-connected projects with a transmission impact may also be affected by the Gate 2 to Whole Queue exercise.
2. The demand queue contains a significant number of well-progressed projects that are unable to connect quickly, due both to the time required for network or generation build – which is a key source of delay – and to the presence of non-viable projects acting as blockers.
3. There are no mechanisms to prioritise strategically important demand projects.

1.3 Our objective is to reform the demand connections process so that viable projects can secure timely connections and strategic projects can be prioritised, delivering benefits for consumers and supporting economic growth while maintaining system security and operational integrity.

1.4 This is a multifaceted challenge, driven by the rapid growth of data centre demand, interacting with existing constraints on network capacity and supply chains. It risks delaying connections for other demand projects that are critical for

decarbonisation and economic growth. This is not a challenge unique to Great Britain's energy system - similar pressures are emerging internationally.

1.5 Data centres must be central to any solutions we implement, given the scale and pace of recent demand growth, the significant impact their connection requirements can have on the system, and the distinct commercial characteristics of their development.

1.6 Working collaboratively with government and the NESO, we are committed to delivering reforms built around three pillars:

- **Curate** focuses on introducing new or strengthened entry and membership criteria where needed to ensure viable projects progress to connection.
- **Plan**, led by government, focuses on supporting government-led prioritisation of strategic projects and developing a new strategic plan for data centres. In March 2026, government consulted on several proposals, including the use of new legal powers to identify strategically important demand projects and whether, following implementation of queue management reforms, a strategically aligned process should be introduced for data centre connections.
- **Connect** focuses on developing new approaches and connection arrangements to accelerate and increase the number of connections, while maintaining a secure system.

1.7 The Call for Input was published on 13 February 2026 and closed on 13 March 2026. We invited views on options for a financial mechanism, strengthened readiness and progression requirements, measures to accelerate connections, and options to enable greater flexibility in connection offers. While responsibility for the Plan pillar primarily sits with government, stakeholders also provided views on how the objectives under this pillar could best be achieved.

Overview of Responses and Respondent Profile

1.8 Our Call for Input received 120 responses. The table below sets out the profile of respondents. We recognise that respondents were not asked to specify their profile when submitting responses. Classifications have therefore been determined based on the information provided in responses, alongside publicly available company information. While some respondents may reasonably fall within more than one category, we have categorised each respondent according to the primary function we identified. We have sought to align the respondent categories, with those used by government in its analysis, which will be presented in their forthcoming consultation response.

Summary of Call for Input Responses: Demand Connections Reform

Respondent Type	Count
Advocacy Group	3
Arm's Length Body	1
Consultancy Service	8
Demand Project Developer	39
Devolved Government	1
District Network Operator (DNO) / independent District Network Operator (iDNO)	9
Generation only Developer	7
Industry Body / Trade Association	15
Integrated Generation/Demand Developer (a developer of both electricity generation projects and electricity demand projects)	18
Investor	3
Local/Mayoral Authorities	3
NGO	1
Private Individual	3
Research Organisation	1
Supplier	2
Technology Vendor	2
Transmission Operator (TO)	4

1.9 As set out in the Call for Input, the first stage of reform focuses on addressing applications from speculative data centre projects in the demand queue. Across responses from demand project developers and integrated generation/demand developers, we sought to distinguish, where possible, between data centre developers and non-data centre demand developers. It was not possible to categorise all 57 respondents across these two groups; however, the analysis below differentiates between them where feasible, highlighting areas of alignment and divergence in views. In total, 40 respondents were identified as data centre developers and 12 as non-data centre demand developers.

1.10 Ofgem acknowledges the range of views expressed by respondents and appreciates the feedback received. While our analysis highlights views from data centre respondents, this does not imply that other perspectives have not been considered; all feedback has been duly taken into account.

2. Curate

The Curate pillar, led by Ofgem, aims to ensure the queue is made up of viable projects that can progress to connection by strengthening queue entry and ongoing membership requirements. This section briefly revisits the proposed readiness proposals and financial mechanism requirements under consideration; summarises feedback received through our recent Call for Input and sets out Ofgem's initial assessment of that feedback alongside our proposed next steps.

Regarding the financial mechanism, the majority of respondents supported Option 1b and Option 2, with a slight majority preferring Option 2. Regarding readiness, respondents broadly supported strengthening readiness requirements through staged, proportionate checks. Outline planning consent attracted the strongest support, while views on financial backing were mixed. Early requirements for full planning consent were least favoured, mainly due to concerns about circularity. There was also support for prioritising hybrid or co-located projects.

Questions

Q1. We invited feedback on Options 1 – 3, including reasons for agreement or disagreement, how each option meets (or does not meet) the stated objectives, any deliverability and/or operability concerns, and any additional factors we should consider in the design of a financial mechanism.

Q2. We invited feedback on the strengthened readiness requirements under consideration, and on any additional requirements we should explore, to ensure that only sufficiently mature projects are able to receive Gate 2 offers.

Financial Mechanism

2.1 In our Call for Input we proposed introducing a financial mechanism in the demand connections queue to deliver on three key objectives: deter applications from non-viable projects, encourage proactive self-termination from non-viable projects and drive timely project progression. The chosen mechanism was expected to deliver upon these objectives to varying degrees and to apply to new and existing data centre connection applications. Based on feedback received, we have decided to introduce a fourth objective for policy development: to facilitate the implementation and administration of the financial mechanism. We have therefore also assessed the different financial mechanisms against this objective. This reflects our earlier acknowledgement in our Call for Input that some options could affect the timeline for development and implementation. Feedback was sought on the following three financial mechanism options, fully outlined in our Call for Input.

2.2 Option 1a): a deposit paid by data centres at the point of connection application or offer acceptance, refunded in a lump sum when a specific milestone is achieved.

2.3 Option 1b): a deposit paid by data centres at the point of connection application or offer acceptance, refunded incrementally when specific milestones are achieved.

2.4 Option 2): a deposit that would increase over time and become payable by data centres if the projects fail to meet certain progression criteria and would be refunded when a specific milestone is achieved, similar to the generation Progression Commitment Fee (PCF) introduced by CMP448.

2.5 Option 3): an upfront non-refundable fee payable by data centres that would be paid at the point of application or offer acceptance.

2.6 Our Call for Input noted the importance of any financial mechanism selected, aligning with existing securities. This includes taking into account the level of security that demand projects will already be required to provide at the point the financial mechanism is implemented. Ongoing code modifications CMP417 and CMP093, seek to align liabilities and securities requirements across generation and demand so that both categories of Users are subject to the User Commitment Methodology.

Summary of Responses

2.7 In response to our question on whether to introduce a financial mechanism, a clear majority of respondents expressed support. In total, 76 respondents (63%) were in favour, 14 (12%) were not supportive, and 30 (25%) did not express a view.

2.8 Of the 76 respondents who expressed support, the largest proportion came from demand project developers, with 26 respondents indicating overall support. The next largest group was integrated generation/demand project developers, with 11 respondents expressing support. Of those expressing support, 28 were data centre developers and eight were non-data centre demand developers.

2.9 We note that a few respondents expressed support for more than one option, considered in our numerical preference breakdown provided.[2] A few respondents also favoured a hybrid approach, combining elements from multiple options, and some feedback – particularly in relation to Options 1a and 1b – was presented on a combined basis.

[2] Categorisation of sentiment throughout: 'A few respondents' refers to the range between 0% and 25% of respondents

Option 1a)

2.10 Support for Option 1a was expressed by 18 respondents (15%). The largest share of support came from demand project developers, with six respondents expressing support. Of those who expressed overall support, six were data centres and two were non-data centre demand developers.

2.11 Respondents who favoured Option 1a highlighted that the mechanism offers a clear and transparent design, is relatively simple to administer, and avoids the additional complexity associated with multi-stage refunds, making it easier to operate for all parties. Some respondents considered that a one-off deposit could help deter speculative applications and encourage earlier withdrawal of projects unlikely to progress to connection, particularly where the deposit was applied at the point of connection offer.[3] There was support for a single refund point, as this reduces ambiguity and limits the scope for gaming. A respondent noted that a refundable deposit could allow capital to be released for use later in the development cycle, which may be important for smaller developers facing greater cash flow constraints.

2.12 However, a common criticism of Option 1a was that, as a single binary refund, it provides no incremental incentive to demonstrate progress against intermediate milestones. Some respondents raised concerns that refundable deposits could allow well-funded but slow-moving or speculative projects to remain in the queue without clear evidence of progression. This was seen to reduce the effectiveness of the mechanism in driving mid-stage progression and risk being perceived as an entry cost that does not adequately distinguish between genuinely progressing and speculative projects. In addition, some respondents highlighted that, if applied too early or set at too high a level, the deposit could disadvantage smaller developers or deter projects facing delays outside of their control, such as planning. Moreover, feedback indicated that Option 1a would be insufficient on its own to meet the stated objectives or to support sustained project progression. To address this, a respondent suggested that it would need to be complemented by an additional financial mechanism or readiness check to be fully effective.

Option 1b)

2.13 Support for Option 1b was expressed by 31 respondents (25%). The largest share of support came from demand project developers, with 14 respondents expressing support. Of those who expressed support, 13 were data centre developers and four were non-data centre demand developers.

[3] Categorisation of sentiment throughout: ‘Some respondents’ refers to the range between 25% and 50% of respondents

2.14 Many respondents who favoured Option 1b generally expressed strong support for an incremental refundable deposit, viewing it as an effective way to encourage timely project progression while deterring speculative projects.[4] Linking partial refunds to clearly defined, auditable milestones was seen as creating a sustained financial incentive throughout the development lifecycle, rather than concentrating incentives at a single point. This approach was considered better able to distinguish between projects that are genuinely progressing and those holding queue positions speculatively, improving queue viability data for Ofgem and the NESO. Some respondents noted that refunds triggered at objective milestones ensure commitment capital is held for long enough to discourage speculative behaviour, while rewarding demonstrable progress in a way that aligns with Ofgem's objectives. The mechanism was also viewed as providing a transparent framework that investors and developers can plan around, rewarding projects that are actively advancing. In addition, a respondent highlighted that incremental refunds could help offset development costs, such as planning and early-stage site work. There was also feedback that Option 1b combines the benefits of a refundable deposit with stronger progression discipline than Option 1a.

2.15 However, concerns were raised about the practical implementation of the mechanism. There was feedback surrounding whether incremental refunds could create an additional administrative burden for the NESO and DNOs. A few respondents highlighted that linking refund triggers to factors outside the developers' control, such as planning consent, could expose projects to disproportionate financial risk. There were also concerns that if refunds are dependent on later stage milestones, developers may be required to commit capital early on without sufficient certainty, potentially disadvantaging smaller developers. A few respondents therefore emphasised the importance of ensuring milestones are proportionate and achievable, to avoid unintended barriers to entry.

Option 2)

2.16 Support for Option 2 or a PCF style model was expressed by 36 respondents (30%). The largest share of support came from demand project developers, with 15 respondents in favour, followed by integrated generation and demand developers, with seven. Of those who expressed support, 15 were data centre developers and three were non-data centre demand developers.

[4] Categorisation of sentiment throughout: 'Many respondents' indicates the view of 50%-75% of respondents

2.17 Respondents who favoured Option 2, generally did so on the basis that a deposit that is refundable upon achievement of defined milestones would better encourage self-termination. Some respondents highlighted that a milestone-based, refundable structure would incentivise early withdrawal by projects with limited prospects of delivery, support timely progression and allow viable projects to reassess risk as development progresses. Option 2 was widely viewed as a more balanced approach, particularly due to its alignment with the existing generation PCF. Alignment with the PCF was seen as a way of providing regulatory consistency and offering a framework that key parts of industry were familiar with. While the option requires developers to increase their deposit and exposure to payment risk as projects progress, a few respondents noted that this is offset by the ability to recover those deposits upon meeting defined milestones, creating a balance between stronger financial commitment and the opportunity to reduce risk as delivery progresses.

2.18 Conversely, many respondents also raised concerns about the design and application of Option 2. A common theme was the need for careful calibration, including the timing of triggers, the level of the fee and the circumstances in which it would be refunded. Some respondents cautioned against directly applying the CMP448 framework to demand connections without adaptation. They noted that demand developers often have different development profiles, meaning that applying the same default assumptions used for generation projects would not be appropriate in this context. In addition, a few respondents suggested that implementation for generation should be monitored first. A few respondents noted several unintended consequences of the PCF, including an increased administrative burden and inequitable outcomes where delays arise from factors outside a developer's control, such as planning processes or network operator delivery timelines. As a result, a few respondents emphasised that any PCF should be flexible and include exemptions for third party delays and applying a capped exposure per megawatt. This was seen as important to ensure that credible projects with longer development timescales are not unfairly penalised or exposed to excessive financial risk.

Option 3)

2.19 Many respondents expressed opposition to Option 3, with this option attracting the lowest level of support compared to the other mechanisms proposed. Support was expressed by five respondents.

2.20 A few respondents acknowledged that a non-refundable fee could act as a deterrent to speculative applications by introducing an early financial threshold. A small group considered that, if set at an appropriate level, such a fee could help

streamline the queue by discouraging applications from projects without credible financial backing.

2.21 Overall, respondents considered Option 3 to be a blunt barrier to entry that performs poorly against the stated objectives of encouraging timely progression and proactive self-termination. Some noted that, once paid, the fee would be treated as a sunk cost and would provide no continued incentive for projects to meet subsequent milestones. As a result, the option was seen as ineffective at influencing behaviour beyond the point of entry and unlikely to encourage projects to exit the queue if their viability deteriorates. Some respondents argued this could create a perverse incentive for speculative projects to remain in the queue indefinitely, failing to address queue blocking. Concerns were also raised about setting the fee at an appropriate level. It was highlighted that a fee set too low would not influence behaviour, while a fee set too high could favour large, well-capitalised developers and disadvantage smaller developers, regionally important projects, or those facing unavoidable delays beyond their control. A respondent also highlighted that a non-refundable fee would divert financial resources away from other essential projects costs key to progression, such as planning. Overall, Option 3 was viewed as the weakest mechanism for driving progression and an ineffective queue management tool.

Interactions with existing securities and CMP417

2.22 Respondents provided views on the interaction between a financial mechanism and existing securities, as well as on the introduction of CMP417. Some respondents expressed strong support for CMP417, which seeks to introduce a more consistent and equitable approach to securities across generation and demand. Some respondents highlighted that the current Final Sums security regime for demand is disproportionate, resulting in excessive capital being tied up. In this context, CMP417 was viewed as key to addressing these inequities. Moreover, there was support for aligning any new financial mechanism with a revised approach to securities for demand projects.

2.23 There was support for the introduction of any new financial mechanism being proportionate and not overly onerous, alongside a suggestion to consider the cumulative impact of both the chosen financial mechanism and existing securities. A recurring theme in relation to cumulative impacts was the need to avoid double counting of payments. A few respondents emphasised that any new financial mechanism must be designed alongside existing securities arrangements to prevent duplicative financial exposure. There was also support for clear transitional arrangements, particularly for projects that already hold a queue position, have secured a connection offer, or have posted securities. A few respondents emphasised that any changes to financial commitment regimes

should apply on a forward-looking basis, and that these specific projects should not have any new financial mechanism charges backdated. However, respondents did not provide detailed views on the design of the transitional period, including how long any such protections should remain.

2.24 Furthermore, a few respondents argued that the approval and implementation of CMP417 should be prioritised, with support for no financial mechanism being introduced until the code modification is in place. Additionally, a few respondents also suggested that payments made under any proposed financial mechanism should be capable of being offset against future securities requirements, to maintain an appropriate and balanced level of exposure for developers.

Overarching themes highlighted in responses

2.25 Beyond providing feedback on a specific financial mechanism preference, several overarching themes also emerged from responses.

2.26 A few respondents noted that they felt more clarity was required from Ofgem on example fee levels and the refund triggers applicable to specific milestones before they could provide a firm view on their preference. Moreover, a few respondents queried whether a binding cash-only requirement would be introduced to fund any payments owed under the mechanism, and whether alternative forms of funding would be permitted.

2.27 There was support among some respondents for any financial mechanism to be proportionate and scaled to project type and size. The need to strike an effective balance between securing a meaningful financial commitment from developers and avoiding increases in development costs that could prevent hybrid and strategically important demand projects from progressing was highlighted. In addition, a respondent pointed to international precedent in support of the application of a megawatt threshold for a financial mechanism, under which projects of a certain size would be exempt.

2.28 A few respondents raised concerns about the potential adverse impact of a financial mechanism on effective competition in the demand market. They cautioned that high fees or thresholds could act as a barrier to entry, disproportionately disadvantaging smaller developers and potentially favouring large, well-capitalised developers who are able to better absorb such costs. Respondents noted that insufficient consideration of this risk could ultimately skew outcomes in favour of developers with the greatest financial resources.

New ideas raised

2.29 Respondents also proposed several additional ideas for how a financial mechanism could be designed and applied. For example, a respondent noted we

should consider the idea of higher deposits and tighter refund timelines for projects that have switched technology class, after securing a queue position.

2.30 A respondent also noted that any new financial mechanism should be applied equally to gas connections, highlighting a risk of encouraging data centres towards gas powered options if the rules were not consistently applied.

Our View

2.31 We acknowledged the views of respondents about their preference for a financial mechanism option and their considerations. We have assessed and scored each option against four objectives. Based on stakeholder feedback, we have decided not to progress further with Option 3, as we agree it would provide weaker incentives for self-termination and timely progression compared to other options. The objectives we are assessing the financial mechanism options against are:

- Discourage less-viable projects in the queue
- Encourage proactive self-termination
- Encourage timely progression
- Simplicity of implementation and administration

2.32 We will continue to refine our Curate proposals through the upcoming Curate consultation, which we intend to publish in the coming weeks. This consultation will set out a detailed analysis of the options under consideration, including a description of proposed policy elements and their implementation. It will also seek stakeholder views to inform further development, in advance of decisions later in 2026.

2.33 We are considering impacts of existing securities and interactions of CMP417. We have requested the NESO and TOs to provide data on a sample of data centre projects to have a more comprehensive understanding of the impact of the financial mechanism and interactions with securities. Our view, which we will consult on, is that both the financial mechanism and securities will be applied without offsetting one another. This approach mitigates the risk of double counting and is expected to provide the strongest incentive for projects to remain in the queue or apply in future.

2.34 We note the views of some respondents requiring more clarity on the policy design of the options considered. In our upcoming Curate consultation, we will cover, among other elements, the scope, applicability period, value and methods required to pay the fee.

2.35 We agree with the view of some respondents to consider how projects change their use or technology. At this stage, we are not convinced that some projects should be charged more than others if they change use or technology. However, change of use requires consideration as it is important to incentivise the right behaviour as well as allowing projects to change use if they wish to. In our consultation, we will describe the implications for projects that change use during the development stage, including those that decide to become data centres and vice versa.

2.36 We have noted the suggestion to apply the financial mechanism to gas connections. We recognise respondents' suggestions to apply the financial mechanism to gas connections, and to consider this an area for further exploration. Current Curate measures target the electricity demand queue and therefore do not extend to gas connections at this stage. However, as noted in the Call for Input, we are continuing to gather relevant data on gas network connections to inform our understanding and any potential future considerations.

Strengthened Readiness and Progression Requirements

2.37 As set out in the Call for Input, the aim of strengthening readiness requirements for data centres is to ensure that only sufficiently mature projects are able to secure a Gate 2 connection offer or retain their existing position in the connections queue. Our Call for Input proposed a range of potential options to strengthen readiness requirements, including evidence of broader financial backing and outline or full planning permission or consent. The Call for Input recognised that such requirements could be applied in different ways: as Gate 2 criteria, as requirements for receiving a connection offer for distribution projects, or as progression milestones. We also noted that new or strengthened requirements could potentially be implemented through new and/or modified queue management milestones. In addition, the Call for Input highlighted that changes could be made through amendments to the Gate 2 Criteria Methodology and acknowledged that there are differences in how readiness requirements may be implemented at transmission and distribution levels. Demand at distribution (commonly referred to as embedded demand) sits outside the Gate 2 Criteria Methodology. We also noted that we will consider whether there is a need to introduce readiness requirements at a distribution level.

Summary of Responses

2.38 In response to our question on the strengthened readiness and progression requirements under consideration, a majority of respondents expressed support. In total, 86 respondents (72%) were in favour, six (5%) were not supportive, and 28 (23%) did not express a view.

2.39 Of the 86 respondents who expressed support, the largest proportion came from the demand project developers category, with 31 respondents indicating overall support. The next largest group was integrated generation/demand project developers, with 13 respondents expressing support. Of those expressing support, 34 were data centre developers and eight were non-data centre demand developers.

2.40 Of the six respondents who were not supportive, three were categorised as integrated generation/demand developers.

2.41 Of the 28 respondents who did not express a view, the largest groups were demand project developers (eight respondents) and industry bodies/trade associations (seven respondents).

Financial Capability

2.42 As part of its consideration of readiness, we sought views on evidence of broader financial backing. Specifically, whether a project could demonstrate credible financial backing beyond a speculative application, showing evidence of support that extends beyond the applicant's stated intentions and demonstrates others are willing to financially support or commit to the project. A range of views were expressed by respondents, outlined below.

2.43 A total of 35 respondents expressed broad support for requiring evidence of broader financial backing as a readiness requirement, including 18 data centre developers. Conversely, approximately 14 respondents expressed strong opposition, including five data centre developers.

2.44 Respondents who expressed support identified several common themes. Firstly, supportive respondents considered that credible evidence of financial backing provides assurance that a project has a realistic prospect of progressing and indicates that it has moved beyond early-stage development. Financial backing was commonly viewed as a signal that a project has been subject to meaningful commercial scrutiny, with an assessment of the associated risks being undertaken. In addition, a few respondents expressed support for the view that financial backing can improve the quality of projects in the queue.

2.45 A few respondents expressed support for linking evidence of financial backing to project milestones. However, others raised concerns that this approach could result in double counting, given the existing queue management milestones provide financial obligations for projects to adhere to and introducing an additional requirement would be unreasonable. To address this, a few respondents encouraged Ofgem to take an integrated view of any financial obligations placed on applicants, to ensure requirements were proportionate.

2.46 More broadly, respondents emphasised that, if financial backing were to be introduced as a readiness requirement, it would need to be stage appropriate. Some respondents opposed the introduction of the requirement too early in the connections process and instead advocated for a phased approach. A group of respondents highlighted that it would be unrealistic for Ofgem to require evidence of strong financial backing before a project had secured a firm connection agreement or had sufficient certainty over key connection details, as such information is typically required to secure investor support. It was noted that introducing the requirement prematurely could create a circular dependency, where financial backing depends on an accelerated connection date, which itself depends on financial backing. In addition, one respondent noted that financial backing would already be sufficiently represented through adherence with a financial mechanism.

2.47 For these reasons, respondents in support of the measures generally considered that evidence of financial backing would provide a more meaningful signal at a later stage of the process, once key uncertainties - particularly around connection certainty – have been reduced, rather than at the earliest entry point.

2.48 Respondents emphasised that any evidence requirements should be proportionate, clearly defined and not overly burdensome. A respondent who expressed a supportive view noted that any evidence must demonstrate a clear indication of interest in the development site from organisations who have the financial capability to push projects through to a financial investment decision. In addition, it was highlighted that evidence had to be specific enough to distinguish between indicative and committed financing.

2.49 There was support for Ofgem's initial evidence list as a reasonable starting point. A few respondents agreed that the proposed evidence types were defined broadly enough to reflect the range of investment structures used by hyperscale data centres. However, it was noted further clarity was needed from Ofgem on the specific documentation needed to meet the evidentiary threshold.

2.50 A range of evidence suggestions were provided by respondents, across those who provided both supportive and negative views, with strong emphasis on flexibility and proportionality to the project stage. Suggested evidence included shareholder or parent company commitment letters, internal investment committee or board level approvals, and credible financing plans, rather than full final investment decision style evidence which may only be available at later stages. Others pointed to final investment decision equivalent approvals, committed financing letters, binding heads of terms, or formal investor commitment letters as appropriate indicators of financial support.

2.51 Additional suggestions included evidence of creditworthiness, such as letters of credit or credit ratings, nonbinding expressions of interest, and evidence of meaningful commercial engagement with customers or operators, even where arrangements are not yet contractually binding.

2.52 Amongst respondents, there was an ask that evidence requirements were flexible to suit different project types and funding models. There were concerns that there would be difficulty in defining clear criteria that could equally be applied to all data centres and that having one criterion for all may lead to inconsistent interpretation.

2.53 Concerns were raised by a few respondents that financial backing requirements may favour larger players, leading to a reduction in overall competition. Responses noted measures that significantly raise the financial threshold for queue participation, were likely to favour well-established organisations that can absorb these risks. This may lead to the exclusion of projects that are ultimately viable but less able to absorb the upfront financial costs.

Long-lead Procurement

2.54 A few respondents argued that expenditure incurred prior to financial investment decision – such as site acquisition, planning costs, grid connection expenditure, or long-lead procurement item orders including transformers – should be recognised as evidence of meaningful financial commitment, particularly given the scale and risk of upfront investment for hyperscale projects. A few argued that demonstrated supply chain commitment, including evidence that procurement for long-lead equipment has been initiated, is an important indicator that a project is on a credible pathway to energisation. Others suggested that projects should provide a long-lead procurement plan, or evidence that orders or procurement for key equipment have begun. A respondent also emphasised that committing to long-lead equipment can itself involve significant commercial risk and should therefore be recognised as evidence of genuine project progression.

Commercial Off taker

2.55 Respondents expressed mixed views on the use of a commercial off taker as a readiness requirement. A few respondents considered evidence of a commercial off taker to be a strong indicator of project seriousness, particularly where this demonstrated a credible route to occupancy and usage of the connection capacity. Suggested evidence included a named data centre operator or owner-operator, a preliminary Master Services Agreement or Heads of Terms, or a letter of intent from an anchor hyperscale customer referencing the expected power envelope and phasing.

2.56 However, a few respondents raised concerns about the practicality and appropriateness of requiring commercial off taker arrangements too early in the connections process. A common theme was that fully executed offtake agreements are unlikely to be finalised until there is greater certainty over connection timing, creating a circular dependency. A few respondents also noted that commercial arrangements for large-scale data centre demand are frequently confidential and may not be publicly disclosed without breaching commercial obligations. A few respondents therefore argued that a prescriptive definition of a commercial off taker could disadvantage certain business models, while a looser definition could risk gaming.

Planning Consent

2.57 Building on the options set out in the Call for Input, we sought views on the use of planning consent as a readiness criterion for queue entry at Gate 2 and at distribution level, or as a progression milestone, specifically the appropriateness of outline versus full planning consent. In total, 53 respondents expressed broad support for treating planning consent as a test of readiness, including 26 data centre developers.

2.58 When examining the types of planning that could be utilised as a test of readiness, the more favoured option was outline planning. In total, 21 respondents were in favour of outline planning, including 13 data centre developers. Some respondents emphasised their support for outline planning, on the basis that it is both an achievable and proportionate milestone. In addition, it is considered a practical and meaningful signal of project seriousness, as securing it requires significant time and capital, demonstrating that projects are committed to progressing and less speculative. There was notable support for outline planning because it is seen to strike an appropriate balance between filtering out speculative projects but avoids the rigidity of full planning too early in development. A few respondents noted it allows flexibility to finalise design details later through reserved matters, aligns with how large developers such as data centres typically progress, and better reflects realistic development timelines. It was also seen as a mechanism to ensure only projects that have genuinely committed resources progress through Gate 2.

2.59 Support for the use of full planning consent as a test of readiness was comparatively lower, particularly where it would be applied at queue entry or as a Gate 2 criterion. Four respondents noted they were expressly in favour of full planning. There was notably limited support for requiring full planning consent at an early stage, with some respondents emphasising that this would be unworkable for many large-scale data centre developments and could risk excluding otherwise viable projects. A consistent theme was that full planning

consent is costly and requires detailed and fixed design assumptions, which often depend on information that only becomes clear once a grid connection offer has been secured. A few respondents highlighted that technical requirements and specific site configurations typically continue to evolve until much closer to the contracted connection date, as these are frequently shaped by the requirements of the off taker. Moreover, some respondents raised concerns about circularity, noting that developers could be forced into premature decisions and required to finalise designs several years in advance, increasing the risk of misalignment and potential financial loss. This risk was compounded by concerns that developers could incur the costs associated with full planning consent but ultimately fail to secure a connection offer.

2.60 In addition, a few respondents argued that requiring full planning consent at the application stage would place an unnecessary burden on planning authorities and could lead to processing delays, given differences in planning processes. These concerns were further amplified by perceptions of delayed connection offers from the NESO, which could result in planning permissions lapsing before connection offers are issued.

2.61 Several respondents argued for a degree of flexibility to be applied to planning requirements. A few respondents highlighted that large-scale developments, including data centres, often progress through extended pre-application engagement with local planning authorities, such that meaningful commitment can occur before detailed consents are secured. A few respondents therefore argued that readiness assessments should recognise structured pre-application activity, rather than relying solely on the grant of outline or full planning permission. A few respondents cautioned that planning frameworks and statutory time limits – typically three years for full planning permission and five years for outline permission – do not necessarily align with grid connection timelines. Without alignment, respondents noted that there is a risk that permissions could lapse or sites could remain stalled for prolonged periods, undermining the objectives of queue reform. A few respondents also emphasised that there are multiple planning pathways, each with distinct requirements and timelines. There was an ask for any methodology to retain a degree of flexibility, so developers are not disadvantaged by their chosen approach.

2.62 There was support for including evidence of land control as part of the defined readiness requirements, as respondents noted it is an important indicator of project maturity and commitment. A few respondents suggested that land control and planning consent are complementary and should be assessed together.

2.63 A few respondents commented on the use of the original red line boundary as a test of project readiness, expressing mixed views on its effectiveness. A few

supported its use, suggesting it could serve as a useful minimum requirement, but emphasised that it should be complemented by additional readiness tests and applied proportionately to avoid unintended consequences. Others, however, cautioned against relying on it in isolation, noting that it may not provide a sufficient indication of project maturity.

New themes raised

2.64 Respondents identified several additional tests of readiness beyond those initially proposed by Ofgem in the Call for Input.

2.65 **Participation in Sustainability Initiatives:** There was support for linking earlier or more favourable connection offers to projects that demonstrate a commitment to sustainability, particularly where projects deliver wider system or environmental benefits. Some respondents supported sustainability participation being framed as a formal expectation of developers and as a mechanism for prioritisation. However, a few respondents took a different view, cautioning that mandatory sustainability criteria could encourage gaming or rely on vague and subjective assessments.

2.66 **Flexibility-based readiness criteria:** Some respondents argued for prioritisation of hybrid or co-located projects, on the basis that these projects have the potential to demonstrate higher levels of deliverability and system value. There was support for rewarding projects that incorporate co-located renewable generation, private wire arrangements or behind the meter solutions, as these may place less strain on the wider transmission system. In addition, a few respondents suggested that projects combining demand with flexible-enabling technologies should be prioritised, as they are more likely to reduce peak system impacts and reliance on network reinforcement. There was also support for granting accelerated treatment to projects committing to substantial clean generation assets, alongside suggestions to introduce a ‘clean energy commitment’ or ‘climate alignment’ style test, requiring evidence of low-carbon power sourcing and a flexibility roadmap.

2.67 There was agreement for expanding the readiness criteria to explicitly recognise ‘flexibility readiness’. This included proposals to recognise binding operability and flexibility commitments such as ramping, or curtailment capability supported by long-duration energy storage, as a pathway to evidencing project maturity. A few respondents noted that such projects could deliver whole-system benefits by reducing peak demand. A few respondents also emphasised that smaller or hybrid projects, which may be better placed to meet flexibility-based criteria, should not be disadvantaged and should be afforded similar opportunities to enhance progression through the queue.

2.68 **Developer track record:** A few respondents proposed that the track record of a developer should be formally considered when assessing readiness. Respondents argued that a history of successfully delivering comparable data centre or large-scale infrastructure projects provides a clear and objective indication of capability, particularly at the early stages of development. Track record was viewed as easier to evidence and verify, reflecting proven experience in securing finance and progressing projects to completion, rather than relying on speculative indicators. However, a few respondents also highlighted caveats around how such a criterion should be designed and applied. In particular, there were concerns that a UK-only assessment of track record could unintentionally exclude established international developers. Others cautioned that placing excessive weight on past performance could disadvantage new or emerging developers seeking to enter the queue.

Application of Requirements

2.69 Across responses, there was support for applying strengthened readiness and progression requirements, but respondents expressed differing views on how these should be implemented. A few respondents argued that key readiness elements, particularly planning-related evidence, are better managed through revised or enhanced milestones within the existing queue framework as opposed to introducing additional readiness requirements. This approach was seen as proportionate, well understood and better able to accommodate project evolution over time.

2.70 On the other hand, there was also support for applying readiness criteria at Gate 2, either as formal Gate 2 criteria or in combination with subsequent progression checks. A few respondents emphasised that the scale of the demand connections queue warranted robust checks at the point projects receive a firm position or connection offer. In addition, a few respondents supported follow up or 'mini re-gates' to confirm that evidence previously submitted remains valid. Conversely, there was an emphasis on avoiding duplication and cautioning against requiring resubmission of evidence where projects have already satisfied equivalent checks.

2.71 Some respondents consistently emphasised the importance of readiness requirements being applied proportionately and consistently across transmission and distribution. Concerns were expressed that applying stronger requirements at transmission level alone could distort developer behaviour, creating incentives to submit applications at distribution level instead.

Treatment of Embedded Demand

2.72 Respondents expressed a range of views on how embedded demand should be treated under the Curate pillar. A consistent theme across responses was the importance of aligning treatment between transmission and distribution, while ensuring requirements remain proportionate. There was broad support for extending Gate 2 criteria, or equivalent readiness and queue management requirements, to embedded demand. This was primarily to reduce the risk of regulatory arbitrage by projects between the transmission and distribution networks, whereby projects may choose to connect at distribution level to avoid stricter transmission-level requirements. A few respondents considered that the current asymmetry risks encouraging speculative behaviour, whereby projects shift between voltage levels or migrate their applications to DNOs to avoid increased requirements, potentially undermining efficient network planning. In addition, a few respondents noted that bringing embedded demand into scope of Curate measures would enable such projects to benefit from reformed connection processes.

2.73 There was support for a more consistent and aligned framework across transmission and distribution networks. Applying consistent principles across both levels was seen as important to ensuring that scarce capacity is allocated to projects that are both viable and able to progress.

2.74 However, a few respondents stressed that any approach should be proportionate. There was support for differentiating requirements on the distribution network based on project size and system impact. In particular, a few respondents suggested that larger embedded demand could be subject to enhanced readiness and progression checks, while smaller projects could continue to be managed under existing distribution processes.

2.75 A few respondents also sought further clarity on the scope and definition of embedded demand. This included which project types would be captured, whether requirements would differ by location, and how any changes would be implemented in practice. One respondent specifically requested that we consult further on how bringing embedded demand in scope of reforms would work in practice.

Our View

2.76 We acknowledge that respondents showed clear support for the introduction of strengthened readiness and progression requirements. We are considering several readiness requirements that projects must meet, aligned to different connection queue milestones, instead of Gate 2 entry requirements, and we will expand on this in our Curate consultation.

2.77 We note stakeholder feedback regarding readiness progression requirements to be applied consistently across both transmission and distribution to avoid distorting developer behaviour.

2.78 Our response to the themes raised by respondents is set out below:

Financial Capability

2.79 Following broad support for evidence of financial backing and in discussion with the NESO and industry members, we are progressing policy development on the evidence of financial backing through to consultation. Some respondents noted that financial obligations may lead to double counting with existing queue management milestones, notably Milestone 7 – project commitment or final investment decision. To prevent this, we are consulting on a financial capability requirement at a stage prior to Milestone 7, in a form that may be more achievable than a final investment decision, such as a credit rating or letter of credit. Following feedback from the Call for Input that introducing this requirement prematurely could create a circularity issue, our proposals aim to ensure that this evidence is required at a stage that can be met reasonably by all sizes of applicant.

Long-lead Procurement

2.80 Following responses that the procurement of long-lead items such as transformers could demonstrate financial commitment and itself involve commercial risk, we are considering a separate requirement for this. This requirement would ask for evidence that procurement for these items has been initiated, either through an invoice or contract with a supplier. We are consulting on requiring this evidence around the time of Milestone 2 – secured statutory consents and planning permission, as discussions with industry groups have highlighted that such long-lead items can take two to three years to arrive.

Commercial Off taker

2.81 Regarding securing a commercial off taker/anchor customer, we are developing policy for this as a milestone progression requirement and are not taking this option further as a Gate 2 entry readiness criterion. We understand that many data centres secure an anchor customer later in the connections process, so we will consult on the requirement for evidence early in the queue management process, with a requirement later for more stringent anchor customer evidence. We believe this should minimise the risks of gaming while ensuring that adequate anchor evidence can be provided.

Planning Consent

2.82 Whilst there was broad support for planning as a Gate 2 readiness requirement, we are not taking this option further at this time. Outline planning would be a measure of whether a project can be developed in principle and would constitute a lower barrier when compared to full planning consent where the development proposal will include more technical detail. The requirements to obtain outline planning consent vary among planning authorities, potentially creating arbitrary differences in queue progression, dependent on a project's location. Furthermore, consent would normally expire within five years if development has not started. Therefore, it may necessitate projects re-applying for outline planning where some applicants receive connection dates too distant in the future.

2.83 For full planning consent, we observe that this is already incorporated within existing User progression milestones, with associated consequences for non-compliance. Requiring full planning as an additional readiness criterion earlier in the process would lead to circularity issues. Securing detailed planning consent often depends on a degree of certainty over connection timing and technical specification, which in turn is influenced by having secured a connection agreement and the overall project development stage. Introducing planning requirements prematurely may therefore impose unrealistic expectations on developers and could constrain viable projects at an early stage.

2.84 For these reasons, we are not taking forward either outline or full planning consent as a formal readiness requirement. Instead, we will continue to focus on alternative readiness measures that provide a clearer, more consistent and more proportionate indication of project maturity, and which can be applied in a way that supports timely progression while avoiding unintended barriers to entry.

Flexibility-based readiness criteria

2.85 We note that some respondents proposed expanding assessment criteria to prioritise hybrid or co-located projects by recognising flexibility readiness and participation in sustainability initiatives. This could include the use of clean energy or climate alignment tests, alongside binding commitments on operability or flexibility (such as ramping or curtailment capability supported by storage). We are not taking these proposals forward as formal Curate assessment criteria at this stage.

2.86 Our approach to strengthened readiness and progression requirements is to focus on measures that can be applied consistently and at pace across a large queue, and that are clear, unambiguous and objectively measurable, with the aim of producing a binary pass/fail outcome without requiring subjective judgement. Many of the suggested tests above would require clear definitions and criteria,

metrics and verification processes, increasing complexity of developing at pace across a large queue and the risk of inconsistent application and dispute.

2.87 This does not mean the underlying issues are out of scope and we may, in future, revisit whether these are appropriate tools under different conditions. We are progressing flexibility and operability options under the Connect workstreams, as outlined in 'Connect Update: Demand Connections Reform', published alongside this document. For example, flexible connections, phased/non-firm arrangements, and consideration of the overlap between system need and what is operable and bankable for data centre projects.

Developer track record

2.88 While some stakeholders argued that developer track record is an easy to evidence proxy for capability and therefore viability, this could create a barrier to entry and unduly skew outcomes towards incumbents, rather than testing for project viability at a time when the data centre sector is undergoing significant change. In light of this, we are not minded to adopt a pure track record test as a Gate 2 entry readiness requirement. However, we will consider what role it could play as part of additional readiness progression milestones we are developing for consultation in due course. Additionally, we will collect data to understand developer history across the connection queues to further inform policy development.

3. Plan

Under the Plan pillar, government has set out proposals to enable timely connections for strategically important demand projects and to support wider government priorities on economic growth, decarbonisation, digital infrastructure and clean energy. Government leads this pillar, with Ofgem ensuring alignment with strategic objectives. No specific questions were asked under this pillar; however, respondents provided relevant feedback, summarised below for transparency, which Ofgem has shared with government.

We expect government to set out further detail on its approach to strategic demand connections in due course.

There was general support for using Planning and Infrastructure Act 2025 powers to accelerate delivery where existing processes are too slow. Respondents supported a clearer, more transparent framework for designating projects as strategic, as well as mechanisms such as Artificial Intelligence (AI) Growth Zones. Concerns were raised regarding auction design, particularly the risk of prioritising ability to pay over project readiness, which could incentivise gaming.

Overview of proposals

3.1 In March 2026, government consulted on a range of proposals. These included using new legal powers to identify strategically important demand projects and introducing a strategically aligned process for data centre connections following the implementation of queue management reforms. The consultation also asked for views on aligning data centres to regional infrastructure targets, the role of flexible connections for large loads and auctions in the allocation of capacity for strategic demand.

3.2 Respondents provided feedback on a range of areas, including the development of a prioritisation framework, the government's AI Growth Zones programme, the potential use of auctions to allocate capacity, and the role of the Planning and Infrastructure Act 2025.

3.3 While no specific question on the government-led Plan pillar was included in our Call for Input, we have summarised the relevant feedback received for transparency, which has been shared with government.

Summary of Responses

Development of a prioritisation framework

3.4 Respondents who commented on the Plan pillar generally supported improved clarity, transparency and predictability in how projects are assessed as strategic. This included how such designations translate into earlier or firmer connection offers.

3.5 Respondents broadly agreed that, without a clear way to distinguish genuinely strategic projects, the current queue system will hinder the timely connection and delivery of important infrastructure. There was support for introducing a prioritisation framework that identifies projects delivering significant economic, social, system and regional benefits, as well as those contributing to decarbonisation. Some respondents also emphasised the importance of project maturity, readiness and deliverability, alongside ongoing compliance with queue management milestones and overall credibility. There were suggestions that projects meeting these criteria should receive preferential treatment, such as earlier or firm connection offers. There was also support for recognising locational benefits, for example where projects reduce network or constraint costs. In addition, a few respondents noted that projects providing controllable or flexible demand should be prioritised ahead of those requiring fully firm capacity from the outset.

3.6 Respondents consistently highlighted that any framework must be clear, transparent and predictable, with objective eligibility criteria and well-defined governance to build confidence and reduce the risk of disputes relating to designation. A few respondents cautioned against criteria that focus too narrowly on a single sector or technology, noting the risk of creating a fast track for data centres at the expense of other strategically important demand. These included industrial electrification, hydrogen production, transport charging infrastructure and carbon capture, usage and storage.

3.7 Some respondents supported aligning prioritisation decisions with strategic planning frameworks, including the Strategic Spatial Energy Plan (SSEP) and Regional Energy Strategic Plan (RESP). A few respondents also called for improved spatial signalling, such as publishing locational capacity outlooks and queue data at Grid Supply Point level. This was seen as a way to reduce speculative applications and support developers in securing anchor customers.

3.8 Projects offering wider operability benefits, such as flexibility, staged delivery, or co-located generation or storage were generally seen as more valuable and should therefore be prioritised accordingly. A few respondents also highlighted the importance of consistent application across Great Britain and cautioned

against creating incentives that favour large developers. A few respondents further noted the need to consider the risk of prioritising projects that may deliver lower overall public value.

3.9 A few respondents supported any prioritisation framework being subject to periodic review to ensure it remains responsive to evolving system needs, changing demand patterns and wider policy developments.

3.10 In relation to the treatment of embedded demand, respondents supported integrated prioritisation across transmission and distribution, including the inclusion of embedded demand projects within strategic designations. This would help ensure that embedded demand that contributes to wider system goals is appropriately prioritised. However, a few respondents cautioned that smaller embedded demand projects should not be disproportionately disadvantaged within such frameworks.

Connection Accelerator Service and AI Growth Zones

3.11 Respondents were broadly supportive of the Connections Accelerator Service as a way to signal strategic priority and potentially support connection of nationally important infrastructure. A few respondents requested clarity on how it will work in practice in terms of how projects will be selected and timelines for implementation.

3.12 Respondents were also broadly supportive of AI Growth Zones benefitting from the Connection Accelerator Service as a way to signal strategic priority and create industry signals for the development of strategically important infrastructure.

3.13 However, respondents also cautioned that an approach focused too narrowly on designated zones could create a two-tier system, with strategically valuable projects outside AI Growth Zones excluded. In response, respondents commonly called for a prioritisation framework that can recognise project-level strategic value and readiness regardless of location, including the ability to treat non-zone projects as strategically important where this is justified.

3.14 A few respondents noted that data centre demand is unlikely to move quickly away from existing hotspots and warned that poorly designed incentives could reinforce concentration in already constrained regions, particularly London and the south east, rather than easing pressure on the system. In that context, respondents stressed the importance of clearer locational signals and greater transparency about where capacity is available, alongside stronger co-ordination of transmission and distribution reinforcement with anticipated demand growth, so that siting decisions are better informed and aligned with network capability.

3.15 A few respondents also highlighted a potential opportunity for AI Growth Zones to enable whole-system optimisation through co-located demand, generation and storage, which could improve energy efficiency and reduce costs.

3.16 A few proposed targeted measures, such as an accelerated Gate 2 application pathway for very large-scale demand proposals currently within the AI Growth Zones selection process.

Auctions

3.17 Regarding the open question on the use of auctions to reserve and reallocate capacity for strategic demand, some respondents raised significant concerns. A common view was that auctions could prioritise the ability to pay over project readiness or system value, potentially favouring well-capitalised organisations, particularly large global technology firms. Respondents noted this could disadvantage smaller or less well-capitalised developers, contribute to market concentration and reduce competition. There were also concerns that auctions may not align with the principle of delivering public value, with a risk that financially stronger parties are prioritised over projects delivering greater system value. In addition, a few respondents highlighted the risk that a whole queue auction could disadvantage essential demand, such as ports, industry or housing.

3.18 A few respondents highlighted risks that auctions could undermine fairness and create uncertainty for projects already in the queue. In particular, they noted that introducing competitive bidding could displace credible projects that have progressed under the existing framework, potentially weakening investor confidence. Concerns were raised about applying auctions to projects with accepted offers or advanced queue positions. In addition, a few respondents also identified a risk of strategic bidding, where participants may secure capacity without a clear intention or ability to deliver, potentially increasing queue congestion and delaying overall system benefit.

3.19 However, a few respondents identified a potential role for auctions if they were tightly scoped and carefully designed. In particular, a few supported their use as a complementary tool alongside administrative prioritisation, rather than as a primary allocation mechanism. Suggestions included limiting auctions to specific highly capitalised sectors or use cases, alongside the introduction of robust pre-qualification criteria and safeguards to ensure fairness and alignment with strategic objectives.

Planning and Infrastructure Act 2025

3.20 Among respondents, there was general support for the government and Ofgem using powers under the Planning and Infrastructure Act 2025 to speed up delivery where existing processes are seen as too slow for the pace of connections reform,

including by accelerating changes to necessary industry codes where code governance timelines are insufficient.

3.21 However, a few respondents emphasised the need for clear timelines and appropriate safeguards, including consultation and an impact assessment, so stakeholders can provide input on proposals before they are implemented. More broadly, respondents asked for clarity on what would be progressed via the Planning and Infrastructure Act 2025 and what would continue to be progressed through code governance.

3.22 Specific to utilisation by government, there was an ask for a coordinated approach that is consistent with devolved and local planning frameworks.

Our View

3.23 The Plan pillar is led by government, with Ofgem supporting its development and ensuring alignment with our statutory duties and strategic objectives.

3.24 We note that respondents were broadly supportive of the core principles underpinning the Plan, and there was also support for the role of Planning and Infrastructure Act 2025 powers in accelerating delivery where possible.

3.25 Given government's lead role in Plan, it is primarily for government to consider these issues and determine how the Plan policies should evolve, including through its recent consultation on accelerating strategic demand connections. Government's consultation closed on 15 April, and they will outline next steps in their forthcoming response. Ofgem will continue to support this work and consider how any resulting approach interacts with our regulatory responsibilities.

4. Connect

The Connect pillar, delivered jointly by Ofgem, government and the NESO, aims to accelerate and increase the number of physical grid connections for demand projects and operate an effective and secure system that includes increasingly large demand loads. It focuses on enabling greater self-build and more flexible connection arrangements. This section summarises the feedback received and sets out our proposed next steps.

There was support for enabling greater self-build and ownership of high voltage assets, including through providing greater clarity on the legal requirements for self-build and ownership under the Electricity Act 1989, developing an Independent Transmission Owner licence and introducing a class exemption. The majority of respondents did not provide a view on self-build and transfer. There was some support for flexibility, non-firm and phased connection agreements, where they are offered on a voluntary basis as a route to faster connection and support system operability.

Questions

Q1. We invited feedback on whether the measures we are considering under the Connect pillar are appropriate and respond to stakeholders' priorities and concerns, and the practical blockers to greater adoption of flexible, non-firm, and phased connection agreements.

Accelerate Demand Connections

4.1 We are considering whether the measures under the Connect pillar are appropriate and respond to stakeholders' priorities and concerns. The measures proposed in the Call for Input are:

- Responding to concerns about the unclear legal framework
- Greater self-build and transfer of high voltage assets
- Greater self-build and ownership of high voltage assets

Summary of Responses

Clarification of rules under Electricity Act 1989

4.2 Some respondents agreed with the stakeholder feedback included in the Call for Input regarding the lack of clarity on the legal requirements for owning high voltage assets and supported the suggestion in the Call for Input that we provide a clarification of our interpretation of the Electricity Act 1989.

4.3 They consistently highlighted that legal uncertainty in this area is acting as a constraint on the use of high voltage connections and clear guidance was therefore viewed as necessary to reduce uncertainty and support investment decisions.

4.4 A few respondents noted that the ambiguity outlined above is impacting the deliverability of energy park developments specifically, particularly those involving shared connections between multiple generators, or co-located generation and hydrogen projects.

4.5 There was support for the requested clarification to be provided urgently, ahead of wider reforms so that demand customers could get high voltage connection offers. A few respondents emphasised that uncertainty is already influencing project design and investment decisions, particularly where lower voltage alternatives may increase costs. Timely guidance was considered essential to unlock investment and to streamline project delivery, given that Transmission Owners are currently developing technical solutions.

Self-build and ownership

4.6 In total, 72 respondents (60%) expressed support for the introduction of self-build and ownership arrangements. Five (4%) did not support the proposal, while 43 (36%) did not express a view.

4.7 Of the 72 respondents who expressed support, the largest proportion came from demand project developers, with 27 respondents indicating overall support. The next largest group was integrated generation/demand developers, with 15 respondents expressing support. Of those expressing support, 29 were data centre developers and eight were non-data centre demand developers.

4.8 Respondents who expressed support for the introduction of new self-build and ownership arrangements, viewed these as an enabler of faster connections. This was considered particularly important for large demand projects, such as data centres, where access to power is often the critical path for investment decisions.

4.9 Other benefits mentioned included providing developers with greater control over delivery, enabling more effective project planning and reducing exposure to delays arising from co-ordination challenges between the NESO and network operators. A few respondents noted that the current framework allows network companies to delay connection delivery with limited consequence, and that a developer-led approach would provide stronger incentives for timely delivery. Existing precedent of the Offshore Wind User Build and Offshore Transmission Owner Regime were referenced, as evidence that similar approaches could be successfully applied in this context.

4.10 Some respondents also noted that self-build could help relieve pressure on Transmission Owners, particularly in the context of constrained resources and increasing demand. By enabling developers to deliver dedicated connection assets, Transmission Owners could focus on more complex reinforcement works, improving overall delivery.

4.11 However, some respondents emphasised that self-build should only be applied in appropriate circumstances and must be supported by a robust monitoring and compliance framework. They highlighted the need for clear technical standards, strong governance, and well-defined responsibilities for design, construction, operation and maintenance. There were concerns that, without these safeguards, self-build could introduce operational risks or create fragmentation in asset ownership and accountability. One respondent cited that increased competition for materials and skills could raise consumer costs or slow wider system delivery.

4.12 Finally, a few respondents acknowledged that self-build alone would not address all barriers to faster connections, pointing to wider constraints such as planning processes and the need for network reinforcement.

Class Exemption

4.13 A few respondents expressed support for introducing a class exemption as a route to enable self-build and ownership, including a proposal put forward by a grid connections consultancy. The grid connections consultancy proposed a new class exemption so that eligible demand and generation projects can build, own and operate the sole-use transmission assets for their own connections, rather than needing to seek bespoke Section 5 transmission licence exemptions or hold a transmission licence. However, a few respondents opposed any form of exemption from the requirement to hold a transmission licence.

4.14 Supportive respondents thought a class exemption could give developers greater certainty on how they could legally own high voltage assets, which would enable greater self-build so projects could be delivered faster. They pointed to the perceived success of class exemptions within the generation licensing framework, describing this as a simple and transparent way to provide industry clarity. These respondents also argued that a class exemption could reduce the overall administrative burden compared to granting exemptions on a case-by-case basis.

4.15 Respondents who opposed raised concerns around system security, accountability and inefficient network design and highlighted the risk that the exemption could undermine Transmission Owners' duties to design and operate a safe and efficient network. Some respondents said that there should be an impact

assessment or cost benefit analysis before any decision is made on the introduction of an exemption.

Independent Transmission Owner (iTO) Licence

4.16 A few respondents expressed support for introducing an iTO licence as part of a wider package of measures to facilitate self-build and ownership.

4.17 Supportive respondents viewed an iTO licence as providing a clearer, more structured and regulated delivery pathway, which could help accelerate connections by giving developers greater flexibility over the design and location of connection infrastructure and reducing reliance on network companies. A few respondents suggested that any iTO model could draw on the iDNO approach at distribution level, which was seen as successful in delivering faster, lower-cost connections and offering a more tailored service to developers. A few respondents also proposed extending the Competitively Appointed Transmission Owner (CATO) regime to apply to large-scale demand connections.

4.18 Supportive respondents highlighted potential system-wide benefits, including relieving pressure on Transmission Owners, allowing them to focus resources on major reinforcement and upgrade programmes required to meet wider decarbonisation objectives.

4.19 However, a number of implementation challenges and risks were also identified. These included the potential that establishing a new licensing framework could take several years, highlighting the need for a clear and credible delivery timetable. Concerns were also raised regarding interactions with statutory unbundling requirements, which may limit eligibility for holding a transmission licence. Finally, a few respondents called for greater clarity on how the regime would operate in practice, including the need for robust technical standards to maintain system safety and clear coordination arrangements between iTOs and the NESO.

Self-build and transfer

4.20 In total, 25 respondents (21%) expressed support for the introduction of self-build and transfer arrangements, while two respondents (2%), including one Transmission Operator, were strongly opposed. The majority did not express a view.

4.21 Of the 25 respondents who expressed support, the largest proportion came from integrated generation/demand developers, with seven respondents indicating overall support. The next largest group was demand project developers, with six respondents expressing support. Of those expressing support, ten were data centre developers and one was a non-data centre demand developer.

4.22 Fewer respondents provided feedback on self-build and transfer arrangements than on self-build and ownership. Those who did were generally supportive, highlighting potential benefits including lower overall costs and enabling developers to deliver connection assets without long-term ownership responsibilities.

4.23 A few respondents noted that transfer or adoption by regulated parties could support long-term stewardship, consistent standards and consumer protection. However, a few respondents cautioned that transferring assets back to Transmission Owners following construction could be legally complex, technically challenging and may introduce delays. Therefore, they emphasised the importance of establishing a clear and agreed decision process, with flexibility to accommodate project-specific circumstances.

4.24 There was also support for continuing relevant code modifications or using Planning and Infrastructure Act 2025 powers, where appropriate, to facilitate implementation, alongside calls to align arrangements in Scotland with England and Wales.

Our View

4.25 We have considered the feedback received and used this to inform our work on these measures. 'Connect Update: Demand Connections Reform', published alongside this document, sets out details of how we are going to enable greater self-build in response to this feedback, including our plans to consult on the detailed measures in the Autumn, alongside further detail of how the responses received have informed this work.

Enabling Flexible Connections

4.26 As highlighted in our Call for Input, many developers have expressed an interest in phased and non-firm connections as a means of securing earlier connection dates, within a context of a wider discussion on demand-led flexibility arrangements. We also recognised the need for technical rules and standards to keep pace with these structural changes in demand. Building on this, we intend to take forward ideas informed by engagement with industry and government. The stakeholder feedback received in response to the Call for Input, including views on the flexible options under this pillar and additional ideas raised, are summarised below.

Summary of Responses

Demand-Led Flexibility Agreements

4.27 In total, 61 respondents (51%) expressed support for adopting demand-led flexibility agreements. Five expressed opposition (4%) and 54 (45%) did not express a view.

4.28 Of the 61 respondents who expressed support, the largest proportion came from demand project developers, with 18 respondents indicating overall support. The next largest group was integrated generation/demand developers, with 12 respondents indicating overall support. Of those expressing support, 19 were data centre developers and eight were non-data centre demand developers.

4.29 Respondents expressed broad support for introducing demand-led flexibility agreements on a voluntary basis. They saw these as a practical tool to accelerate connections by enabling earlier energisation and making more efficient use of constrained network capacity. Some emphasised that flexibility should be offered on a voluntary, opt-in basis, and that the decision to accept a flexible agreement should rest with the developer, who is best placed to assess the impact on their business case.

4.30 Respondents also highlighted that flexibility must provide a clear incentive to participate. While there is appetite to engage, a few respondents noted that financial incentives alone may not be sufficient to offset the costs of redesigning processes or integrating enabling technologies. A few respondents pointed to co-located battery energy storage systems, on-site generation, private wire configurations, and software-enabled demand response as potential routes to deliver flexibility.

4.31 A consistent theme was the need for clear, standardised and bankable frameworks to support uptake. Respondents stressed that developers and investors require transparent connection products, defined curtailment and constraint methodologies, early visibility of operational limits, and consistency across network operators. Without this clarity, uncertainty around risk allocation, compliance requirements and performance obligations was seen as a significant barrier to adoption. Developers were seen as far more likely to accept flexible arrangements where the commercial and operational framework is clear.

4.32 There were also calls for clarity in the definition of flexibility, and how this will be evidenced and monitored over time, and how these arrangements will interact with system planning and operation.

Non-firm Agreements

4.33 In total, 43 respondents (36%) expressed support towards adopting non-firm connection agreements. In addition, 11 (9%) expressed opposition, and 66 (55%) did not express a view.

4.34 Of the 43 respondents that expressed support, the largest proportion came from demand project developers, with 15 respondents indicating overall support. Of those expressing support, 17 were data centre developers and two were non-data centre demand developers.

4.35 Supporters generally viewed non-firm agreements as a pragmatic way to accelerate energisation, enabling earlier and partial buildout rather than waiting for wider network reinforcement. This is particularly the case where developers are able to operate flexibly during periods of system constraint. A few respondents emphasised that non-firm agreements are credible options where they are supported by measurable flexibility and behind-the-meter solutions such as co-located generation or battery energy storage. These approaches were seen to reduce network impacts and provide a clearer basis for earlier access to capacity.

4.36 However, a few respondents consistently noted that uptake is likely to remain limited unless agreements are underpinned by standardised terms, particularly for complex sites involving multiple owners or hybrid arrangements. This was viewed as necessary to enable developers and investors to assess risk consistently. Concerns were also raised around uncertainty, with respondents calling for clear parameters on curtailment, including maximum levels and how these are measured, alongside clarity on notice periods, compensation arrangements, noting that these uncertainties may impact project financing.

4.37 A few respondents highlighted that lenders and investors – particularly for large data centres – require a high degree of revenue certainty, and that open-ended curtailment provisions would undermine investment decisions. As a result, a few respondents argued that non-firm agreements should include a clear and defined pathway to a firm connection, including how and when any transition should occur. Non-firm agreements were generally preferred on a voluntary rather than mandated basis. Respondents also stressed that suitability will vary by load type, and that Ofgem and the NESO should monitor outcomes to ensure non-firm arrangements are applied appropriately and do not transfer unmanaged risk onto developers. This reflects concerns raised about previous arrangements at distribution level, where very high curtailment levels were offered by DNOs.

Phased Connection Agreements

4.38 In total, 59 respondents (49%) expressed support towards adopting phased connection agreements. In addition, three (3%) expressed opposition, and 58 (48%) did not express a view.

4.39 Of the 59 respondents who expressed support, the largest proportion came from demand project developers, with 24 respondents indicating overall support. The next largest group was integrated generation/demand developers, with eight respondents expressing support. Of those expressing support, 24 were data centre developers and seven were non-data centre demand developers.

4.40 Respondents who expressed support generally viewed phased agreements as a voluntary route to faster energisation, enabling projects to begin operating at partial capacity while wider reinforcement is delivered, and providing an earlier pathway to connection aligned with system readiness. A recurring theme was that phased profiles can better reflect how data centres develop in practice, where power requirements often increase over time and sites are delivered in phases, meaning full capacity is not required at the outset. It was considered that aligning capacity increases with phased build-out could reduce the risk of unused reserved capacity and improve capital efficiency for both developers and network companies, while supporting the timely progression of strategically important infrastructure alongside longer-term reinforcement.

4.41 However, respondents also highlighted a number of concerns which they considered would need to be addressed for phased agreements to be scalable within the demand context. A consistent theme was the need for greater clarity and standardisation of terms and triggers for progression between capacity tranches. Such uncertainty in these areas was seen to potentially create financial and investment risk. A few respondents therefore called for the introduction of standardised phased agreement templates across transmission and distribution, noting existing variation in approaches between network operators. Practical challenges were also identified, including difficulties forecasting detailed ramp schedules sufficiently far in advance and aligning procurement and financing with phased delivery. In addition, a few respondents emphasised the importance of reliable delivery, noting that delays in providing incremental capacity could undermine project viability. These concerns were, in some cases, linked to wider issues of confidence in the connections process, including constrained network operator capacity, which a few respondents considered could amplify risks associated with agreements dependent on staged delivery.

Update technical standards

4.42 In total, 20 respondents supported updating technical standards. The majority of respondents did not express a view.

4.43 Of the 20 respondents who expressed support, the largest proportion came from demand project developers, with seven respondents indicating overall support. The next largest group was DNOs/iDNOs, with four respondents indicating overall support. Of those expressing support, eight were data centre developers.

4.44 There was general agreement among respondents that clearer and more modernised technical standards are needed to enable increased self-build, contestability and alternative ownership models, while maintaining the safe and secure operation of network assets.

4.45 A few respondents called for a more consistent and standardised set of technical requirements across transmission and distribution to reduce compliance burdens and avoid differing specifications depending on connection point. It was emphasised that, if a wider range of parties are permitted to build, own or operate high voltage assets, technical standards and assurance processes must be clear and robust, covering areas such as design rules, testing, commissioning, handover and ongoing obligations.

4.46 There was discussion that the current framework is not well suited to the current demand connections landscape and should be updated to better reflect how sites operate and manage risk. A few respondents highlighted the need for standards that are appropriate for direct current connections and the specific characteristics of large data centres, rather than relying on assumptions designed for generation. They stressed that requirements must remain technically deliverable and should not outpace technological development. A few respondents also supported reviewing resilience requirements - such as N-1 and N-2 (levels of network redundancy) - including the Security and Quality of Supply Standard, alongside related Grid Code changes.

Our View

4.47 We have considered the feedback received and used this to inform our work on these measures. ‘Connect Update: Demand Connections Reform’, published alongside this document, sets out the details of how we are going to continue to explore the options for alternative connection arrangements. This will focus on evidence gathering and expanding stakeholder engagement and provides further detail of how the responses received have informed this work.

4.48 We observed in responses there was some lack of consistency in terminology around firm / non-firm connection agreements and flexibility. We will endeavour to provide greater clarity in relevant definitions in future publications.

4.49 We recognise the ask for existing or new connecting arrangements, either firm or non-firm, to consider financing and bankability requirements. We are engaging with stakeholder groups to understand the requirements for this.

5. Wider Comments

Summary of Responses

Demand Capacity Register & Transparency

5.1 Respondents' views on a Demand Capacity Register were limited but broadly supportive of increased transparency. Ofgem is leading on the development of a Demand Capacity Register as part of wider reforms. A Demand Capacity Register was seen as part of a wider need for improved visibility, including clearer information on available grid capacity, reinforcement timelines and regional constraints, to support more informed siting decisions and reduce speculative applications. A few respondents noted that limited access to information on queue position and delivery timelines undermines investor confidence and acts as a barrier to effective investment planning.

5.2 There was support for a Demand Capacity Register to provide information on queue composition, regional capacity and voltage levels, as well as clearer links between contracted demand, available capacity and planned reinforcements. In addition, there was support for the idea that greater publication of queue data, or more regular project reviews, could help identify speculative or non-progressing projects and support more effective queue management.

6. Conclusions and next steps

This section summarises our next steps following responses to our Call for Input. It explains that, across all three pillars, respondents highlighted the scale and complexity of the challenge of reform, the need for proportionate measures, and the importance of clarity on policy design and implementation. It also outlines our intention to consult on a range of measures under the Curate and Connect pillars, while continuing to support government-led work under the Plan pillar.

6.1 Given the broad range of responses to our Call for Input, and the recognition of the complexity of demand connections reform, we intend to continue progressing this work taking account of the views expressed by industry. Our conclusions and planned next steps across each of the three pillars are set out below.

Curate

6.2 **Financial Mechanism:** We have decided not to take forward Option 3. We will continue to consider the interaction between any preferred option, existing securities and ongoing work under CMP417.

6.3 **Financial Capability:** We are progressing proposals on evidencing financial backing through to consultation. We are not taking forward anchor customer evidence as a Gate 2 readiness criterion. Instead, we will consult on a staged approach, with evidence required earlier in the queue management process and more stringent evidence at a later stage.

6.4 **Planning Consent:** We are not taking forward changes to the existing requirements around outline or full planning consent.

6.5 **Flexibility-based criteria:** We are not progressing these proposals within the scope of Curate measures at this stage. Our approach to strengthened readiness and progression requirements is to prioritise measures that can be applied consistently and at pace across a large queue, and which are clear, objectively measurable and capable of delivering a binary pass/fail outcome without subjective judgement. We will continue to progress flexibility and operability measures through the Connect workstreams.

6.6 **Developer track record:** We are not minded to introduce a track record test as a Gate 2 readiness requirement, given the risks of restricting market entry and disadvantaging new or smaller participants.

6.7 **Next steps**: In response to stakeholder views, we will continue to refine our Curate proposals through the upcoming consultation. This will set out detailed analysis of the options under consideration, including design features,

implementation considerations and implications for projects that change use during development. It will also expand on the readiness requirements outlined above. Our focus remains on developing measures that provide a clear, consistent and proportionate indication of project maturity, supporting timely progression while avoiding unintended barriers to entry.

Plan

6.8 Under the Plan pillar, respondents strongly supported the introduction of a process to prioritise strategic demand and the use of the Planning and Infrastructure Act 2025 to deliver this. Respondents noted that a clear and transparent framework for selecting strategic projects would be needed and voiced particular caution around the use of auctions to allocate capacity to strategic demand.

6.9 **Next steps:** Given government's lead role in this pillar, we will continue to support this work and consider how any resulting framework interacts with our regulatory responsibilities. Government's Accelerating Strategic Demand Connections consultation closed on 15 April, and government is expected to publish their response in due course.

Connect

6.10 We have considered the feedback received under Connect and used this to inform our ongoing work on these measures. 'Connect Update: Demand Connections Reform' sets out our latest thinking, alongside further detail on how stakeholder responses have informed this work.

6.11 **Connect – Accelerate Demand Connections:** 'Connect Update: Demand Connections Reform', published alongside this document, sets out details of how we are going to enable greater self-build in response to this feedback.

6.12 **Connect - Enabling Flexible Connections:** 'Connect Update: Demand Connections Reform', published alongside this document, sets out the details of how we are going to continue to explore the options for alternative connection arrangements with a focus on evidence gathering and expanding stakeholder engagement.

6.13 **Next steps:** As set out in 'Connect Update: Demand Connections Reform', we aim to consult on several policies in Autumn 2026.

Send us your feedback

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

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

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