

Transforming the Connections Experience: outputs / next steps from themes 2-5 and 7 of the connections end-to-end review

Publication date:	25 September 2026
Response deadline:	6 November 2026
Contact:	Alasdair MacMillan / Connections Policy team
Team:	Electricity Connections Policy Development
Email:	connectionspolicy@ofgem.gov.uk

This document sets out our¹ decisions to improve the electricity connections experience for customers, building on our November 2024² and December 2025³ consultations and extensive stakeholder engagement throughout 2026.

Whilst there are examples of good practice across industry, stakeholders consistently told us that the current process can be difficult to navigate, with inconsistent service standards, unclear offers, limited visibility of project progress, and insufficient accountability where delays occur. Our review of the regulatory framework, supported by performance data, identified areas where current requirements are not delivering the outcomes customers expect.

In response, we have developed reforms to improve the customer experience, establish clearer minimum standards across the connections journey, and drive more ambitious connection offers. We have also decided to strengthen accountability for timely delivery through enhanced customer compensation and improved, transparent, performance reporting.

These decisions aim to deliver greater consistency, transparency and customer protection while maintaining flexibility for network companies to operate and innovate. Further consultation will inform the detailed implementation arrangements.

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

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

³ [Connections end-to-end review: updated proposals and next steps | Ofgem](#)

Transforming the Connections Experience: 2026 policy consultation

© Crown copyright 2026

The text of this document may be reproduced (excluding logos) under and in accordance with the terms of the Open Government Licence.

Without prejudice to the generality of the terms of the Open Government Licence, the material that is reproduced must be acknowledged as Crown copyright and the document title of this document must be specified in that acknowledgement.

This publication is available at www.ofgem.gov.uk. Any enquiries regarding the use and re-use of this information resource should be sent to psi@nationalarchives.gsi.gov.uk.

Transforming the Connections Experience: 2026 policy consultation

Contents

Transforming the Connections Experience: outputs / next steps from themes 2-5 and 7 of the connections end-to-end review	1
Executive summary	4
1. Introduction.....	6
Background.....	6
Document scope and structure	7
Purpose of the document	9
Other publications and related work.....	10
Timeline and next steps	11
2. Quality and Reliability of Customer Service (themes 2, 4 and 5)	13
2.1 Minimum Requirements Across the Connections Journey (themes 2 and 4)	13
2.2 Ambitious Options for Customers (theme 5).....	41
3. Timely and Reliable Connections (themes 3 and 5)	53
4. Standardisation of Network Dispute Processes and Guidance for Determinations (theme 7)	71
Your response, data and confidentiality	81
Appendix 1: GSoPs payment values	83

Transforming the Connections Experience: 2026 policy consultation

Executive summary

Transforming the Connections Experience

As we move towards an electrified energy system, access to timely and effective electricity connections is becoming more important for households, businesses and public services. Requests for connections have also increased from generation, storage and demand projects needed to drive economic growth, maintain security of supply and enable the transition to net zero. Customers have told us that navigating the connections process is complex, inconsistent and difficult to understand across different network companies and licensed regions, particularly where multiple parties are involved or where projects experience delays and changes. Additionally, disputes can be difficult to settle due to the lack of clear accountability between parties and perceptions that outcomes are not always fair or transparent.

Purpose of this Decision

Our objective is to introduce greater consistency, transparency and accountability across the connections process to improve the experience of connecting customers.

The decisions published in this document establish a clear expectation on how electricity transmission and distribution companies, and the National Energy System Operator (NESO) engage with customers throughout the connections journey, from initial enquiry through to final project delivery. This forms part of a wider package of reforms that include: Transforming Connections Data (TCD), Demand Connections Reform, Strategic Planning and Network Price Control Setting. Together these initiatives aim to create a more transparent, efficient and customer-focused regime that supports economic growth and the transition to a net zero energy system.

Our decisions

We have decided to introduce new prescriptive licence conditions establishing consistent minimum requirements at key stages of the customer journey, including around the information provided to customers, network company communications and engagement, the content of connection offers, and the management of project changes throughout the delivery process. These requirements will be complemented by principles-based licence conditions designed to drive broader improvements in customer experience and network company behaviours, including expectations relating to customer service, stakeholder engagement, the clarity and transparency of communications and the ambition of connection offers.

Alongside these obligations, we will introduce guidance where appropriate to support consistent implementation while preserving flexibility for networks to deliver improved outcomes. Taken together, we consider this approach strikes a proportionate balance between consistency and innovation, and welcome stakeholders' views on this.

To support more timely and reliable delivery of connections, we will immediately undertake further work to strengthen Guaranteed Standards of Performance (GSoPs) for DNOs and introduce greater-than-zero Liquidated Damages (LDs) provisions in

Transforming the Connections Experience: 2026 policy consultation

connection agreements for TOs, to bolster incentives on network companies to meet agreed delivery commitments.

We have also decided to strengthen network company accountability through enhanced monitoring, reporting and performance visibility arrangements, enabling customers and other stakeholders to better understand and compare performance across the connections process.

Finally, we have decided to improve arrangements for customer redress through the development of a more consistent dispute resolution process, supported by updated determinations guidance and clearer escalation pathways for customers where issues arise.

Engagement to date

These decisions build on the work undertaken through the end-to-end review and reflect months of engagement with customers, network companies, NESO and wider industry stakeholders.

We previously consulted in December 2025 on a range of proposals aimed at improving customer experience across the connections journey. Stakeholders broadly supported the overall direction of travel and agreed that greater consistency, transparency and accountability were all needed. Through consultation responses, workshops and targeted industry engagement throughout 2026, stakeholders provided detailed feedback on how reforms should be implemented and where greater clarity or flexibility was required.

Next steps

In the coming months we will progress to implementing these decisions, including the necessary licence modifications, the development of supporting guidance and expansion of GSoPs / introduction of LDs for TOs. We will continue to work closely with all stakeholders in the industry to refine implementation details so that changes can come to effect throughout 2027 and at the start of the ED3 price control period in April 2028.

Transforming the Connections Experience: 2026 policy consultation

1. Introduction

This chapter explains why we undertook the connections end-to-end review and how it fits within the wider programme of connections reform. It sets out how we progressed the review through consultations and stakeholder engagement. It also explains how we have structured this publication, the role that licence obligations and supporting guidance will play in implementing the reforms, and how these decisions interact with wider Ofgem and industry initiatives. Finally, it outlines the next steps, including further stakeholder engagement, licence drafting, statutory consultation and implementation of the package.

Background

- 1.1 Timely and efficient access to electricity network connections is essential to support electrification, economic growth and the transition to a net zero energy system. Over recent years, the volume and complexity of connection applications have increased significantly as new generation, storage, demand and low-carbon technologies seek to connect to the system.
- 1.2 At the same time, through consultations, stakeholder engagement and workshops, stakeholders have consistently raised concerns about the customer experience of obtaining and progressing a connection. These concerns included inconsistent standards of service, poor visibility of project progress and risk, uncertainty around connection dates, variations in the quality and transparency of information provided by network companies, and difficulties navigating increasingly complex processes involving multiple parties. Stakeholders also emphasised the need for improved coordination between distribution network operators (DNOs), Transmission Operators (TOs) and NESO as connection projects become more interconnected.
- 1.3 In response to these challenges, Ofgem approved NESO's proposals for a significant programme of connections reform, Target Model Option 4 (TMO4+).⁴ While much of this work has focused on strategic issues such as queue management, network planning and connections data, stakeholders have repeatedly highlighted that wider process reforms alone will not deliver the improvements customers need, unless they are accompanied by better customer service, communication, transparency and accountability throughout the connections journey.
- 1.4 Ofgem launched the connections end-to-end review to examine the customer experience across the full lifecycle of obtaining and delivering an electricity connection. The review was intended to complement the broader reforms being

⁴ [Decision on Connections Reform Package \(TM04+\) | Ofgem](#)

Transforming the Connections Experience: 2026 policy consultation

delivered through the Connections Action Plan⁵ and implementation of the TMO4+ connections reforms by identifying improvements that could be made to interactions between customers, networks companies and other delivery parties throughout the connections process.

- 1.5 The review subsequently developed a package of proposals across seven themes covering connections data, customer service standards, timeliness of connections, connection offers, ambitious connection dates and options, minor connections, and the determination process. These proposals were consulted on through the Connections end-to-end review of the regulatory framework publication in November 2024 and Updated Proposals and Next Steps publication in December 2025.
- 1.6 Following the publication of the Updated Proposals and Next Steps document, we have continued to engage with stakeholders extensively throughout 2026, including through bilateral discussions, industry working groups and workshops. This engagement has informed the decisions contained within this document. The resulting package seeks to establish a common baseline for customer experience across the sector, ensuring greater consistency for customers while retaining flexibility for network companies, where appropriate, for how those expectations are met.
- 1.7 The measures in this document sit alongside the TCD programme (formerly theme 1) to improve the quality, availability and transparency of connections data. This includes several proposals relating to key connections datasets and reforms intended to provide customers and market participants with better information on network capacity, reinforcement activity and the status of connection projects. Improved data transparency supports the objectives of this publication by helping customers to make more informed decisions and increasing the visibility of the connections process.

Document scope and structure

- 1.8 This publication has been structured around the outcomes we are aiming to improve throughout the customer journey, rather than the original end-to-end review consultation themes. We found that there were significant overlaps and interdependencies with many of the themes, with individual proposals often contributing to the same customer outcome - transforming the overall customer experience through the connection journey.
- 1.9 Feedback from stakeholders demonstrated that concerns relating to customer service, communications, transparency, connection offers and project delivery are closely linked. We have therefore reorganised the document to bring related reforms together within a single package, Transforming the Connections

⁵ [Ofgem and DESNZ announce joint Connections Action Plan | Ofgem](#)

Transforming the Connections Experience: 2026 policy consultation

Experience (TCE), to provide a more coherent explanation of the challenges identified, the outcomes we are seeking to achieve, and the decisions we have taken.

- 1.10 This document covers the former themes 2, 3, 4, 5 and 7 in detail, and outlines the stakeholder views, our response and decisions and details the next steps required ahead of the implementation of any changes. Theme 1 (Connections Data) is explored in a separate document, TCD. Finally, we are progressing theme 6 (Smaller Connections) separately as a dedicated programme of work. While there are important links between smaller and larger connections, stakeholders have consistently highlighted that the challenges affecting households, small businesses and low-carbon technology installations are distinct from those affecting larger and more complex connection projects. We therefore consider that a standalone programme provides the most proportionate route for developing targeted reforms and regulatory arrangements for smaller connections customers.
- 1.11 As part of this approach, the former themes 2, 4 and 5 have been brought together under ‘Quality and Reliability of Customer Service (themes 2, 4 and 5)’. We have combined the former themes 2 and 4 into a single chapter – ‘2.1 Minimum Requirements Across the Connections Journey (themes 2 and 4)’, followed by a chapter on ‘2.2 Ambitious Options for Customers (theme 5)’.
- 1.12 This is then followed a chapter on ‘Timely and Reliable Connections (themes 3 and 5)’ outlining measures focused on the distinct objective of ensuring connection dates are met.
- 1.13 In our final chapter, we explore the ‘Standardisation of Network Dispute Processes and Guidance for Determinations (theme 7)’.
- 1.14 Unless otherwise stated, the proposals set out in this document are intended to apply to all larger connections projects, as defined through the ED3 price control framework.⁶ The changes would apply across both distribution and transmission connections, with the affected licences expected to include the electricity distribution, electricity transmission and national system operator licences.
- 1.15 This allows us to consider the specific barriers and opportunities affecting smaller connections customers, alongside the role of future ED3 incentives, reporting and accountability arrangements, while developing policy and regulatory mechanisms in close consideration of wider government objectives on electrification, Clean Power 2030 and Net Zero. We therefore intend to undertake further stakeholder

⁶ [Sector specific methodology consultation: electricity distribution price control \(ED3\) | Ofgem](#): smaller connections, typically single households and small housing developments classified as LVSSA and LVSSB, are connection journeys that are sufficiently standardised and repeatable, whereas larger connections, including LVAL, HV and EHV classifications, involve more bespoke engineering, project management and delivery arrangements.

Transforming the Connections Experience: 2026 policy consultation

engagement and consult separately on the future smaller connections framework, while ensuring that the outputs remain aligned with the broader package of connections reforms described in this document.

- 1.16 Each chapter follows a consistent structure, beginning by setting out the problem statement and overarching goal. We then provide an overview of the stakeholder feedback we've received through previous consultation and industry engagement and outline our response and analysis of these insights, including exploring our rationale behind the decisions set out in this publication. Finally, we outline the decisions taken and our consultation questions for industry feedback. Decisions and consultation questions are numbered by reference to the relevant chapter and section of this document. As chapter 1 is introductory and does not contain decisions or consultation questions, numbering begins in chapter 2.

Purpose of the document

- 1.17 This decision document builds on the proposals set out in the December 2025 consultation and reflects the extensive feedback received in response, as well as the significant programme of stakeholder engagement taken in the months since. Through consultation responses, workshops, bilateral discussions, working groups and wider industry engagement, stakeholders provided detailed views on the practicality, proportionality and implementation of our proposals.
- 1.18 We have carefully considered this feedback in developing our final policy package. This document explains the policy direction decisions we have taken, the changes made to our original proposals in response to stakeholder views, and how the resulting reforms will deliver a more consistent, transparent and reliable connections experience for customers.
- 1.19 Though this is a decision document, we have included consultation questions to give industry an opportunity to input before we begin drafting licence conditions, engaging with industry on the development of guidance, and entering into a Statutory Consultation process ahead of implementation.
- 1.20 Decisions and consultation questions have been set out at the end of each section. We remain receptive to further feedback with regards to the design and implementation of new measures set out in this document and note that some areas remain that require further policy development.
- 1.21 Therefore, at the end of each subsection, we have structured the outcomes of our analysis in the following manner:
- decisions confirmed now, with implementation and/or detailed design subject to consultation
 - areas for further policy development

Transforming the Connections Experience: 2026 policy consultation

Other publications and related work

- 1.22 As identified in the background section, these decisions form part of a broader programme of reforms to connections being delivered by Ofgem, industry and network companies. Alongside the measures set out in this document, Ofgem is progressing the TCD programme (formerly theme 1) which is to be published alongside this document, to improve the quality, availability and transparency of connections data.
- 1.23 Ofgem is also undertaking broader work on demand connections⁷, recognising the growing volume and diversity of customers seeking connections to the electricity network and the need for processes that are proportionate, transparent and responsive to customer needs. Measures explored under the Connect Operate workstream pillar of Demand Connections Reform, particularly Alternative Connection Agreements, relate closely to this publication and the proposed measures herein support the outcomes Connect Operate aims to achieve.⁸
- 1.24 The reforms in this document should also be viewed alongside ongoing work to improve connections delivery arrangements, including reforms relating to strategic planning, queue management, and network coordination. While these workstreams address different aspects of the connections process, they share a common objective to ensure that customers can secure network connections more quickly, transparently and predictably while supporting investment and the efficient development of Great Britain's electricity network to deliver economic growth and progress towards net zero.
- 1.25 A number of respondents asked whether these proposals should apply to Independent Distribution Network Operators (IDNOs) and Independent Connection Providers (ICPs). While the primary focus of this package is on obligations placed on DNOs, TOs and NESO, we recognise that IDNOs and ICPs play an important role in connections. Where IDNOs operate under electricity distribution licences, existing distribution licence obligations will continue to apply, and we will consider through further policy development whether any additional measures may be required to ensure customers receive a consistent experience regardless of delivery model.
- 1.26 Outside of the end-to-end review, Ofgem is conducting a review of the IDNO regime to assess whether the current regulatory framework remains fit for purpose as the sector continues to grow. The review will consider how the framework works in practice and its effects on consumers, competition, network development, net zero ambitions and economic growth, as well as whether any changes to the existing arrangements are needed. Over the coming months, we

⁷ [Proposed data centre connection reforms | Ofgem](#)

⁸ [Connect update: demand connections reform](#)

Transforming the Connections Experience: 2026 policy consultation

will launch a call for input to gather evidence and support future policy development.

ED3 Monitoring Function

- 1.27 This work also complements wider reforms being developed through the ED3 Price Control framework (April 2028 to March 2033), specifically the Larger Connections Incentives. In May 2026 we published our Sector Specific Methodology Decision (SSMD) outlining the decisions we have decided to progress with. This included strengthening the role of the Larger Connections Customer Satisfaction Survey (LCCSS) and Connections Annual Reports (CARs) as the primary mechanisms for assessing customer outcomes and monitoring performance across the larger connections journey, while moving away from a greater reliance on standalone process-based measures. We also confirmed that we would introduce a reward element to the current penalty-only framework, and that further work would be undertaken on areas such as survey and reporting design.
- 1.28 As we noted in our SSMD document, we expect the LCCSS to be used to gather customer views on key aspects of the end-to-end experience at each stage of the journey and test whether the standards are delivering meaningful improvements. Simultaneously, CARs could provide a consistent vehicle for reporting on performance against individual standards, and areas where companies have taken action to address customer feedback.
- 1.29 Together, these mechanisms will provide the primary means of monitoring performance against many of the new end-to-end minimum requirements. It would also become possible to compare performance across companies and inform any future refinements to the standards, guidance or incentives framework.
- 1.30 While the licence modifications and supporting guidance will establish the requirements placed on network companies, the incentive framework will help assess whether these requirements are translating into improved customer outcomes in practice, and penalise or reward DNOs based on the satisfaction survey results.
- 1.31 The design of the ED3 Connections Incentives and associated stakeholder engagement will progress in parallel, helping to ensure alignment across the wider package of connections reforms.

Timeline and next steps

- 1.32 This consultation will run for six weeks, from 25 September to 6 November 2026. Following publication, we will begin drafting the associated licence changes and guidance, informed by stakeholder engagement and responses to this

Transforming the Connections Experience: 2026 policy consultation

consultation. This work will culminate in a statutory consultation on licence modifications.

- 1.33 While the measures set out in this document will require further policy development, licence drafting and statutory consultation before taking formal effect, we expect network companies and NESO to begin delivering improvements ahead of implementation wherever possible. The issues identified through the end-to-end review are well understood, and many of the proposed measures reflect improvements in customer communication, transparency, coordination and accountability that can be progressed without waiting for new regulatory obligations to come into force. **We therefore expect network companies to consider how the principles and expectations set out in this document can be adopted on a voluntary basis in advance of formal implementation.**
- 1.34 We are considering the most appropriate implementation timeline for the package as a whole. While we expect to finalise our guidance document(s) in early 2027, regulatory modifications are expected to follow after. One option would be to introduce new licence obligations from summer 2027 following the statutory consultation process. An alternative approach would be to align new licence obligations coming into effect with the start of ED3 in April 2028, providing a single, coordinated launch of the wider customer service, monitoring and incentive framework. Through consultation and stakeholder engagement, we are seeking views on the advantages and disadvantages of these approaches and any practical considerations that should inform implementation planning.
- 1.35 Any modifications to the GSoP framework and LDs provisions will follow a separate timetable, reflecting the distinct regulatory processes required, including legislative change and industry code modifications. The current intent is to also align implementation timelines with start of ED3. We will further consider this as we move forward.

Transforming the Connections Experience: 2026 policy consultation

2. Quality and Reliability of Customer Service (themes 2, 4 and 5)

2.1 Minimum Requirements Across the Connections Journey (themes 2 and 4)

Section summary

This section sets out the minimum requirements we intend to introduce across the connections journey to improve the quality, consistency and transparency of customer experience. It covers pre-application engagement, application processes, connection offers, post-offer communications, offer acceptance, project delivery and customer escalation routes. It summarises stakeholder feedback, explains our assessment of the issues raised, and sets out the minimum standards we intend to apply at each stage of the customer journey, alongside the role of licence obligations, guidance and future monitoring arrangements.

Problem statement (from original November 2024 consultation)

- 2.1 Limited standards of service requirements apply to the DNOs, TOs and NESO during certain phases of the connecting customer journey. Standard of service requirements are generally focused on the application and offer creation stages, rather than the pre-application stage.
- 2.2 For the stages of the customer journey where standards do apply, such as at the offer creation stage, alignment and duplication checks across the regulatory framework are required to ensure it works efficiently and harmoniously.
- 2.3 Additionally, the regulatory framework generally focusses on the timeliness within which offers must be provided by network companies and NESO, but does not set out clear requirements on the quality of the offer and the information provided.

Goal (from original November 2024 consultation)

- 2.4 To ensure standards of service requirements across all stages of the connections customer journey are fit for purpose in driving the right behaviours and outcomes, and that the different levels of the regulatory framework work in harmony. This should apply to all customers connecting at larger voltage levels to ensure they receive good and consistent service.⁹
- 2.5 A regulatory framework that drives the creation of high-quality offers and associated documents/information provided, which are clear, transparent and detailed enough to provide certainty to the customers and investors.

⁹ See [Scope](#) for further discussion of applicability of these changes.

Transforming the Connections Experience: 2026 policy consultation

Summary of stakeholder views

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

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

- 2.6 In the previous consultation we presented Proposal 2.1, a non-exhaustive list of potential milestones to assign prescriptive licence conditions to. We considered these would represent appropriate points within the customer journey for minimum standards to apply. Respondent feedback is summarised below for each milestone suggested.

A timeframe within which the regulated party must respond to customer’s initial contact

- 2.7 Respondents broadly supported a minimum requirement for initial contact, particularly developers, generators and investors who identified inconsistent services between networks operators, slow responses and lack of clarity on next steps and further pre-application support options. However, most respondents stressed that requirements should focus on the quality and value of the response to initial contact rather than response times alone which could result in low-value responses and compliance-driven behaviour.
- 2.8 Whilst most network companies supported the intent of the requirement they cautioned against standards that could constrain innovation, particularly the increasing use of digital and self-serve options, and lead to an excessive resource burden. It was also noted that ‘initial contact’ was not clearly defined.

A timeframe within which the regulated party must offer a pre-application discussion

- 2.9 There was strong support from customer groups for improving pre-application engagement standards, with respondents highlighting its importance in helping understand connection options, develop high-quality applications and make informed project and investment decisions.
- 2.10 Respondents consistently emphasised that requirements should focus on the quality, usefulness and accessibility of engagement rather than volume-based metrics or timeframes alone, which could shift focus from customer outcomes to compliance. Respondents also highlighted the importance of access to technical expertise, clear points of contact, meaningful discussions, and clear information on connection options, assumptions, constraints and next steps.

Minimum requirements on the scheduling of connection surgeries for pre applicants

Transforming the Connections Experience: 2026 policy consultation

- 2.11 In addition to responses regarding pre-application engagement, respondents were generally supportive of minimum standards for connection surgeries but emphasised the need for safeguards, such as proof of intent or readiness criteria, to avoid resources being diverted towards speculative projects and cautioned against volume-based requirements which risk compliance-driven behaviour.

A minimum timeframe for regulated parties to respond to project-specific post-offer communications

- 2.12 There was strong and consistent support from customers for introducing standards around post-offer communications. Customers highlighted inconsistent post-offer communication standards, delayed responses and limited visibility of project progress as a key source of project delay, uncertainty and customer dissatisfaction. Customers supported minimum expectations around the ownership of queries, response timeframes and regular progress updates.

- 2.13 A common theme in responses, however, was that the focus should be on the quality and completeness of communications rather than response timeframes alone. Respondents highlighted the need to improve coordination where multiple parties are involved in project delivery, particularly communications between DNOs, TOs and NESO citing unclear ownership of queries and uncertainty of response expectations.

- 2.14 Network companies cautioned against blanket response timeframes for full query responses, noting that queries vary significantly in complexity and that requirements should reflect the nature of the query and wider project circumstances. Some respondents, primarily network companies, raised concerns that poorly designed requirements could incentivise automated acknowledgement or low-quality responses to meet compliance targets rather than resolving customer issues.

A minimum timeframe for a formal programme 'kick-off' meeting between network company and customer

- 2.15 Respondents supported stronger communication, ownership and early engagement to align expectations and improve project coordination, provided requirements remain proportionate to project complexity. Through consultation responses and further engagement, it became clear that the requirement for a kick-off meeting must be customer driven, as not all customers require this service. It was further suggested that the requirement should be linked to project readiness, planning progress or other project-specific triggers rather than being fixed universally.

Key project personnel assignments, such as project manager, should be confirmed within a set timeframe

- 2.16 The majority of respondents supported the provision of a clear point of contact, recognising that customers can often struggle to identify who is responsible for

Transforming the Connections Experience: 2026 policy consultation

their project or where to direct questions. Support came from both developers and network companies, with several respondents highlighting the benefits of clearer ownership, accountability and communication through the customer journey.

- 2.17 However, some network companies cautioned against prescribing organisational structures, noting that customers may sometimes benefit from direct engagement with technical specialists or project designers. These respondents favoured a focus on accountability and customer outcomes rather than mandating how organisations should structure customer-facing teams.

A minimum standard for the detailed design stage timeframe

- 2.18 Respondents broadly supported improving transparency, visibility and accountability during the detailed design and delivery phase. Developers, generators and customer representatives highlighted that they sometimes lack clear and consistent expectations on detailed design and delivery timeframes post-offer, leaving them with poor visibility of progress, milestones, dependencies, delays and expected completion dates.
- 2.19 A common theme across customer groups was that the focus should be on clear design and delivery programmes, milestone visibility and proactive communication of progress, delays and changes, rather than simply prescribing a design completion deadline.
- 2.20 Network companies generally accepted that customers need better visibility of progress through design and delivery stages but consistently raised concerns about introducing fixed design-stage timeframes arguing that detailed design and delivery is often iterative and dependent on customer readiness, project complexity and third-party factors.
- 2.21 Respondents also supported additional requirements around programme management, outage planning, commissioning activities and communication of programme changes.

Minimum timeframes attached to the arranging and completion of vital survey works by network companies

- 2.22 Customer and network respondents broadly supported the introduction of minimum requirements for survey works, recognising that delays in arranging and completing critical surveys are a recurring source of project delay and uncertainty. Respondents supported clearer requirements for survey planning, communication and accountability, including greater visibility of survey requirements, prerequisites, expected timings, progress and delays. There was broad recognition that survey progression is often dependent on customer readiness, planning and site access considerations, as well as survey requirements varying considerably by project and connection type.

Transforming the Connections Experience: 2026 policy consultation

Summary of findings

- 2.23 Overall, respondents showed strong overall support for the introduction of prescriptive licence conditions to establish minimum service requirements across the customer journey. Support was particularly evident among developers, generators and other connection customer groups who viewed that clearly defined milestones could improve transparency, accountability and consistency. Network company responses were generally more mixed, with some supporting the intent of clearer standards but raising stronger caveats around flexibility and proportionality.
- 2.24 Several common themes emerged across responses to the proposed milestones. Respondents consistently emphasised that minimum standards should be designed to improve customer outcomes rather than simply measure compliance with prescribed timeframes and “tick box” approaches. In particular respondents emphasised that the quality of the service delivered should be considered alongside the achievement of milestones.
- 2.25 Another common theme across responses was the importance of ensuring minimum standards are sufficiently flexible and proportionate. This was a particularly strong theme in network company responses but was also reflected by other respondent groups. Respondents cautioned that ‘one-size-fits-all’ approach may not be appropriate for all projects, and that some requirements need to be capable of accommodating different project circumstances while still delivering consistent customer outcomes.
- 2.26 Another consistent message across respondent groups was the importance of recognising dependencies between network companies, customers, NESO and third parties. There was a broad view that minimum standards need to appropriately reflect the roles of each party and clear ownership, while ensuring accountability for delivering customer outcomes.
- 2.27 Respondents proposed several additional milestones for consideration. Common suggestions included milestones relating to the communication of delays and project changes, specific design stages, cost updates, legal agreements and consents, outage planning and commissioning activities. Outage planning requirements, in particular, was suggested by several respondents as an area where customers currently experience limited visibility and uncertainty around delivery timescales and a common cause of project delays.
- 2.28 While support for the proposal to introduce prescriptive licence conditions was widespread, a minority of respondents questioned whether prescriptive licence conditions were the most appropriate mechanism, favouring more principles-based or code-led approaches.

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

Transforming the Connections Experience: 2026 policy consultation

- 2.29 Many respondents, across respondent types, supported the use of principles-based licence conditions for behaviours and outcomes that cannot be prescribed and require flexibility, such as communication, transparency, accountability and coordination, arguing that principles can accommodate the diversity of connections projects. However, a significant number, including both network companies and customer groups, raised concerns about enforceability, consistency of interpretation and the risk of creating legal uncertainty, with some favouring prescriptive requirements or a combination of principle-based requirements combined with clearer supporting guidance.
- 2.30 The most common suggestions for principles-based requirements focused on clear, timely and proactive communication throughout the customer journey. Developers, generators and other customer groups highlighted the importance of regular updates, prompt responses to queries, early communication of risks and delays, and greater transparency around project status, cost and scope changes, network constraints, design assumptions and key decisions.
- 2.31 Many respondents also stressed that the quality, usefulness and accessibility of information provided is at least as important as timeliness, with several cautioning against approaches that prioritise speed over meaningful customer engagement.
- 2.32 Accountability, customer ownership, coordination and information sharing between customers, DNOs, TOs and NESO were also identified by many respondents as areas that could be effectively targeted through principles-based requirements. Several respondents highlighted dedicated points of contact, continuity of personnel and clear escalation routes as requirements that could be addressed by principles-based licence conditions, as they focus on behaviours and customer outcomes rather than processes that can be prescribed through fixed milestones or timeframes.

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

- 2.33 Additional comments focused heavily on the need for stronger communication, transparency and accountability throughout the connections journey. Many advocated for network companies and NESO to provide more visibility on project progress including regular milestone updates, clearer information on causes of delays and greater clarity on which parties and individuals are responsible for progressing activities or resolving issues.
- 2.34 A recurring theme across developers, generators and other customer groups called for stronger accountability and enforcement, suggesting that the introduction of new minimum standards needs to be reinforced by effective enforcement and credible consequences such as publication of network performance. It was also noted that minimum standards and accountability

Transforming the Connections Experience: 2026 policy consultation

arrangements need to reflect the dependencies between NESO/TOs/DNOs as well as with ICPs and IDNOs.

- 2.35 Respondents also highlighted the lack of standardisation as a significant issue in the connections experience. Suggestions included greater consistency across network companies in the language, terminology, communications and processes used throughout the connections journey.
- 2.36 In the previous consultation we presented our decision to not address issues with the Third Party Works (TPW) process through the end-to-end review and instead expected industry to progress with code modification proposals that address the current gaps in service levels and communication, as part of wider changes to standardise the TPW process within the context of the new reformed connection process.
- 2.37 TPW is the process through which an application for connection at transmission is assessed for its impact on the downstream distribution network. The process involves various stages of communication and information transfer between the connecting customer, NESO, TOs and DNOs.
- 2.38 A small number of respondents directly addressed this decision in response to Q2.3. Of these respondents, some customers raised concerns that deferring the issue to a code modification process risks further delay and that the code modification process has been ineffective to date. However, other respondents agreed that TPW should be out of scope but requires monitoring and should be revisited if needed. Therefore, we retain the position of the previous consultation.

Quality of connection offers and associated documentation (theme 4)

- 2.39 In the previous consultation we presented Decision 4.1, exploring the introduction of minimum standards for the content of connection offers through a prescriptive licence condition. We also presented Decision 4.2 exploring the introduction of a principles-based licence condition on clarity of communication and engagement at the offer stage. Additionally, we set out Proposal 4.1 which suggested that minimum standards be supported by a price control metric (discussed in the ED3 SSMD publication). We sought stakeholders' views on how these requirements could improve the clarity, consistency and transparency of information provided to connection customers. We asked for feedback on the following question:

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

- 2.40 In this section, we summarise the responses received from a wide range of industry stakeholders and have used these responses to refine our policy positions detailed under 'decisions'.

Stakeholder support for improved offer quality and consistency

Transforming the Connections Experience: 2026 policy consultation

- 2.41 The vast majority of respondents supported the introduction of clearer and more consistent requirements for the information contained within connection offers and associated documentation. This view was shared across developers, energy users, electric vehicle (EV) charging stakeholders, community energy organisations and community energy representatives.
- 2.42 Respondents considered that the quality and content of connection offers vary significantly between network companies. Respondents noted that this makes offers difficult to understand, compare and assess. Many argued that this can create uncertainty for customers, hinder investment decisions and contribute to disputes later in the connections process.

Greater transparency on costs, timelines and project risk

- 2.43 A majority of respondents, particularly developers, generation and storage customers, demand customers and energy users, called for greater transparency regarding costs, timelines and project dependencies. These respondents requested more detailed cost breakdowns, including clearer explanations of contestable and non-contestable works, key assumptions underpinning costs and factors that may cause costs to change during project delivery.
- 2.44 Respondents also emphasised the importance of providing customers with clearer project timelines, key milestones, delivery risks and dependencies. Developers and larger connection customers were particularly supportive of improved visibility of reinforcement work, planning requirements, outage dependencies and third-party consents. Respondents considered that greater transparency in these areas would improve confidence in the connections process and support more informed investment decisions.

Improved technical information with offers

- 2.45 Many generation, storage and demand customers also highlighted the need for more comprehensive technical information within offers. Respondents frequently suggested that offers should clearly explain the proposed point of connection, network constraints, reinforcement requirements, asset ownership boundaries and, where relevant, curtailment arrangements and queue position. Respondents considered this information important for understanding the viability of projects and risks associated with accepting an offer.

Improving accessibility and customer experience

- 2.46 Alongside the information provided, respondents emphasised the importance of improving the accessibility and usability of connection offers. Customer groups, community energy organisations and developers of smaller projects in particular argued that documentation should be easier to navigate, use clearer language and present information in a more consistent format across network operators.

Transforming the Connections Experience: 2026 policy consultation

- 2.47 Many respondents supported use of standardised templates or minimum information standards to improve consistency and enable customers to compare connection offers more effectively. However, network companies cautioned against a ‘one-size-fits-all’ approach, highlighting the diversity of connection projects and customer needs.

Escalation arrangements

- 2.48 A number of respondents raised concerns regarding customer support and escalation arrangements. These views were primarily expressed by developers and larger connection customers, who highlighted the difficulties of identifying the appropriate contact when issues arise. These respondents suggested that offers should clearly identify points of contact, explain how customers can raise queries or challenge information and provide clear routes for escalation and dispute resolution.

Ensuring proportionate and flexible requirements

- 2.49 While there was broad support for improving offer quality and consistency, some respondents, primarily network companies, cautioned against overly prescriptive requirements. These respondents noted that connection projects vary significantly in complexity and argued that any future requirements should allow sufficient flexibility to accommodate different customer needs and project types. However, these respondents generally supported the overall objective of improving transparency, clarity and customer understanding.
- 2.50 This sentiment was also reflected in more recent stakeholder engagement conducted through a series of industry workshops. Several respondents, particularly network companies, favoured mandating the minimum information that should be provided, ie regulating the ‘core’ content, with supporting guidance providing further detail over extensive and rigid templates, highlighting the need to balance consistency with flexibility and avoid one-size fits all approaches.

Our response and analysis

- 2.51 To simplify the consultation and reflect the way customers experience the connections journey in practice, we have combined themes 2 (quality of customer service) and 4 (quality of offers and associated documentation) into a single section covering minimum requirements across the connections process.
- 2.52 Feedback from respondents consistently highlighted that the quality of engagement, information provision and communication are closely linked throughout the customer journey, including at offer stage, and so are best considered together. As a result, our response and analysis section is structured around the key connection milestones setting out the minimum standards, information requirements and customer protections that should apply at each stage of the journey.

Transforming the Connections Experience: 2026 policy consultation

Scope

- 2.53 Throughout our engagement, some stakeholders have proposed that certain requirements should only apply to extra high voltage (EHV)¹⁰ connections and above, reflecting the greater complexity, cost and risk associated with these projects. However, we have also received evidence from a range of customer groups and project types indicating many of the issues these proposals seek to address are also applicable to high voltage (HV)¹¹ and low voltage (LV)¹² customers. Our proposals have therefore been developed based on evidence from a broad range of larger connections customers.
- 2.54 However, where appropriate we have identified where specific requirements should apply differently to specific connection types. For example, proposals relating to an enhanced minimum offer content are intended to apply to EHV and other larger connections as standard, whilst allowing other customers to opt in where they would benefit from enhanced information and engagement. As we continue to develop this policy, we welcome any further evidence on whether the proposed scope is appropriate, including whether requirements should vary according to voltage level and whether any proposed exemptions are sufficient.
- 2.55 Additionally, while much of the respondent feedback received to date has focused on DNO and TO processes, we recognise that NESO plays a critical role in the customer experience, particularly for transmission-connected customers where NESO act as the primary customer interface and offer-issuing party. Our intention is that the minimum requirements set out in this chapter apply across both distribution and transmission arrangements. For transmission connections, NESO would be responsible for ensuring that connection offers contain the required information and meet the relevant minimum requirements.
- 2.56 We recognise that the delivery of many of these requirements relies on information provided by the TOs. Appropriate arrangements between NESO and TOs will therefore be needed to ensure that the information required to produce clear, transparent and consistent offers is made available in a timely manner.

Minimum requirements

1. Pre-application

Initial contact

- 2.57 We have decided to retain our position to introduce a prescriptive licence condition requiring licensees to acknowledge and respond to pre-application enquiries within a fixed timeframe that will be determined following this publication collaboratively with industry. In response to stakeholder feedback

¹⁰ Large generation and demand (eg data centres and large industrial sites) of voltage >132 kV.

¹¹ Medium generation and demand (eg large housing developments) of voltage between 1kV and 132 kV.

¹² Unmetered generation of voltage >1kV (eg small non-domestic generation sites).

Transforming the Connections Experience: 2026 policy consultation

that ‘initial contact’ was not clearly defined, we have further considered the intended scope of the requirement and have decided that this requirement will apply to any initial pre-application enquiries submitted through an appropriate channel to be defined by the licensee, such as online portals or emails.

- 2.58 We recognise stakeholder concerns that a timeframe requirement alone may incentivise compliance-driven behaviour and responses that provide limited value to customers. However, we consider a clear response timeframe as an important standard to ensure timely customer engagement and greater consistency across licensees. This requirement will ensure that customers receive prompt acknowledgement of enquiries and receive clear signposting of next steps and available pre-application engagement opportunities within an appropriate timeframe.
- 2.59 To address concerns around quality, we intend to supplement the licence condition with supporting guidance setting out our expectations for the content and quality of the initial response. We expect this guidance to cover the acknowledgement of enquiries, clear signposting of next steps and available support, indicative timeframes for subsequent engagement where a substantive response cannot yet be provided (this will likely be in the form of a complexity-tiered timeframe), and information on relevant contacts, escalation routes and self-service resources. This guidance will be developed collaboratively with industry following this publication.

Pre-application engagement

- 2.60 The previous consultation proposed separate minimum requirements for pre-application discussions and connection surgeries. The primary goal of pre-application engagement is to ensure prospective customers can access timely, meaningful and effective pre-application engagement that supports informed applications and project development. In response to significant stakeholder concerns regarding minimum scheduling requirements for connection surgeries and volume-based metrics, we have decided not to introduce a separate requirement for connection surgeries and will instead introduce a single pre-application engagement requirement.
- 2.61 We have decided to introduce a prescriptive licence condition requiring licensees to provide pre-application engagement within a fixed timeframe when requested by the prospective customer. We consider minimum timeframes necessary to ensure engagement is timely, provide certainty over when support will be available, and establish a clear and enforceable baseline expectation across licensees. The specific timeframe(s), and whether they should vary by engagement types and around application windows, will be developed collaboratively with industry following this publication.
- 2.62 We recognise concerns that pre-application engagement may require proportionate readiness criteria, such as the provision of project information

Transforming the Connections Experience: 2026 policy consultation

before a connection surgery is booked, to avoid overly speculative or inappropriate requests. We therefore intend to explore suitable readiness criteria to apply this requirement which does not increase barriers to entry for smaller customers and emerging technologies.

- 2.63 This requirement will be accompanied by guidance setting out our expectations for the availability, cadence and quality of pre-application engagement, including maintaining connection surgeries, offering more targeted discussions when requested, the requirement to have suitable technical expertise present and expectation to make clear to customers all available connection options (eg firm/non-firm access). Further work is required to review current best practices and required improvements to develop the guidance for pre-application engagement as well as further understand and develop appropriate readiness criteria.

2. Application

Standardised application templates/ checklists

- 2.64 Having considered feedback from respondents, we continue to believe that clearer and more consistent applications would support more efficient processing of applications and improve customer experience. We therefore intend to proceed with application checklists using a supporting guidance document which would set out the mandatory, conditional (only required for certain technologies or connection types), and optional fields. We consider this approach addresses stakeholder concerns regarding proportionality and not requiring a single mandated template, while still delivering greater consistency across the application process.

Provide support to enable informed and decision-ready applications

- 2.65 We continue to consider that customers should receive appropriate support to help them understand application requirements and make informed decisions. Improving application quality at an early stage can reduce delays later in the process and contribute to a more efficient connections journey. We therefore intend to proceed with a principles-based licence condition to ensure prospective customers receive sufficient information, support and engagement to make informed decisions and submit right-first-time applications and assistance in the case of incomplete offers. However, this still allows network companies flexibility across the varied customer journeys in how this outcome is achieved.

Point of contact(s)

- 2.66 Having considered the feedback received, we remain of the view that customers should have clarity regarding who is responsible for managing their interactions with network companies throughout the connections process. A clear point of contact should improve communication, provide greater accountability and help customers navigate sometimes complex interactions more effectively.

Transforming the Connections Experience: 2026 policy consultation

- 2.67 We therefore intend to introduce a prescriptive licence condition with a requirement for customers to be provided with a point of contact(s) at the point of a complete and accepted application and throughout the connection journey. This will be supported by guidance detailing the proposed responsibility for the point of contact(s) and proposed approaches to continuity. This will still allow network companies flexibility in how they organise and deliver this function.

3. Offer creation and provision

Checklists for minimum offer content and model templates

- 2.68 We remain of the view that there is a strong case for establishing minimum standards for offer quality and content. We have decided to introduce a prescriptive licence condition requirement for the minimum ‘core’ information that should be included in all offers, and the ‘enhanced minimum content’ that should be included in larger projects. This will be supported by guidance outlining further detail and good-to-have content, as well as model offer templates tailored to non-standard project types.
- 2.69 We consider that ‘enhanced minimum content’ is appropriate for larger or more complex projects, where customers often require additional information to understand project risks, dependencies, delivery arrangements and potential impacts on costs and timescales. Through stakeholder engagement, we refined our approach from an earlier opt-out model, to a more targeted framework, whereby enhanced minimum requirements apply to defined categories of projects (to be determined in collaboration with industry) where additional transparency is most necessary.
- 2.70 We consider this approach strikes an appropriate balance between consistency and flexibility. Rather than mandating a single standardised template, which received significant pushback from network companies, we will focus on the information customers should receive to support informed decisions while allowing network companies flexibility in how this is presented and distinguish between core requirements applicable to all customers and enhanced information requirements for larger or more complex projects. This is intended to ensure that the level of information provided is proportionate to customer needs, avoiding the need to develop detailed offers where such information is unlikely to be required.
- 2.71 Where customers are offered alternative access arrangements, including firm and non-firm access options, network companies should provide sufficient information to enable informed customer decision-making, including the basis on which the option is non-firm, implications for access rights, curtailment, capacity, future network works and any expected pathway to a firm connection. We recognise that approaches currently vary across network companies and intend to consider whether further standardisation or guidance is required through future

Transforming the Connections Experience: 2026 policy consultation

development of the **Opt-in mechanism for earlier connection dates**, to provide optionality for customers to accept earlier connection dates.

2.72 We propose for the ‘core’ offer to largely resemble offers issued today and consist of:

- connection date
- point of connection
- capacity offered
- connection design
- voltage
- connection charge
- acceptance period and expiry date
- technical requirements and standards
- customer obligations and milestones
- terms and conditions of connection

2.73 We propose for the ‘enhanced core’ offers to be issued to all larger customers reasonably requiring detailed information to include:

- connection date with dependencies and assumptions underpinning the offer (eg planning, outages, third-party consents)
- cost breakdowns, instead of a single total figure
- delivery timelines/ milestones
- visibility of how dates may change and what would trigger slippage
- connection point and design: specification, capacity, configuration
- contestable vs non-contestable works
- explicit option to accept firm vs non-firm access and explanation of impacts
- curtailment risks and practical mitigation options (eg Active Network Management (ANM) schemes or technical limits)
- contain definitions and explanations of concepts
- identification of enabling works and reinforcement works
- interface points between DNO/ TO/ NESO
- a named point of contact responsible for the offer – technical and information provision
- additional project-specific information relevant to the connection type (eg strategic projects, transmission-dependent distribution connections, non-firm access/flexible connections, phased developments)

2.74 We propose for the ‘good-to-have’ offer to provide information on:

- more detail on how dates might change – if caveats, state 1) what removes it; 2) indicative time/costs to remove; 3) when it will be firmed (milestone)
- detailed modelling assumptions or methodologies; full breakdowns of engineering design

Transforming the Connections Experience: 2026 policy consultation

- historical asset/ outage data; wider system data
- commitment to cost updates at defined milestones
- distinction between customer-funded vs network-funded works
- sole-use vs shared works
- include a Single Line Diagram
- clear identification of NESO vs TO accountability embedded into offer document
- confirmation who owns delivery and who handles queries and changes
- project-type-specific guidance, diagrams or illustrative examples to help customers understand complex arrangements

Offer tailored to non-standard project types

- 2.75 We agree with respondents that told us that the information needs of customers vary significantly depending on project characteristics and that minimum offer requirements should reflect this. We, therefore, have decided to collaboratively with industry, produce guidance on the provision of additional information within offers for projects where enhanced transparency would likely be beneficial.
- 2.76 This could include, for example, transmission-dependent distribution connections, non-firm access or flexible connections, phased development, large demand projects, storage developments, and projects involving multiple delivery parties. We consider that this approach will provide greater consistency across network companies while ensuring that customers receive information relevant to their specific circumstances.

Coordinated transmission-distribution (T-D) process

- 2.77 We continue to consider that clearer requirements are needed to ensure effective coordination where customers depend on multiple organisations to progress their connection. While existing obligations already require certain levels of cooperation, the feedback from respondents suggests that customers still experience challenges. We have decided to require cross-party coordination, and intend to set out expectations on cooperation, issue resolution, information sharing and escalation arrangements between networks and NESO (through a principles-based licence condition).
- 2.78 For projects involving multiple licenced parties, including NESO, TOs and DNOs, we expect customers to receive clear information regarding roles, responsibilities, ownership of activities and appropriate points of contact. This is intended to improve coordination across organisational boundaries and reduce the risk of fragmented communication or uncertainty regarding accountability.

Clear, transparent and factually correct offers

- 2.79 We continue to believe that all customers should be able to rely on offers being clear, transparent and accurate based on the information available at the time they were issued. We therefore intend to proceed with a principles-based

Transforming the Connections Experience: 2026 policy consultation

requirement on network companies to take reasonable steps to ensure information provided to customers is understandable, transparent and factually correct.

- 2.80 We do not intend for this requirement to eliminate uncertainty where it genuinely exists. Rather, it should ensure that uncertainties, assumptions, risks and dependencies are clearly explained so that customers can understand the basis of the offer and the circumstances under which costs, scope or delivery dates may change. We consider that this approach appropriately balances stakeholder concerns regarding proportionality and deliverability with the need to improve the quality and reliability of connection offers.

4. Post-offer queries and change control

Time-bound window(s) to respond to clarificatory questions

- 2.81 We continue to believe that customers should receive timely responses to clarificatory questions and requests to correct errors. However, we recognise the concerns raised regarding the introduction of a single rigid response deadline. We have therefore decided to introduce a prescriptive licence condition which sees queries categorised based on complexity and assigned a timeframe for response accordingly (eg simple, moderate and complex queries).
- 2.82 This approach reflects respondent support for greater transparency and accountability while recognising the practical challenges identified by network companies. While we remain open to alternative approaches, the timeframes would be agreed with stakeholders through established engagement fora.

Transparent change control

- 2.83 We have decided to proceed with requirements aimed at improving transparency around post-offer changes. We intend to introduce a prescriptive licence condition requiring networks to operate a transparent change control process for material changes to offer and associated documentation (informing customers of what has changed, the rationale behind this, and the implications on the project).
- 2.84 This will be supported by guidance providing more detail on what constitutes a material change, who should be treated as an affected party and recommended formats/best practice. We consider this approach reflects the strong support expressed by stakeholders and will help customers make informed decisions while improving confidence in the connections process.

5. Offer acceptance

Consistent acceptance procedures and timelines

- 2.85 We continue to believe that customers would benefit from a more consistent approach to offer acceptance. We remain of the view that there should be clearer expectations on network companies regarding how offer arrangements are

Transforming the Connections Experience: 2026 policy consultation

communicated and administered, including the steps customers must follow to accept an offer, any conditions associated with acceptance, and the timelines that apply throughout the process. This would help customers to understand the actions required to secure and maintain their connection.

- 2.86 While we recognise the need for some flexibility to accommodate different project types and delivery arrangements, we consider that a principles-based licence condition and supporting guidance setting out the expectation for consistent acceptance procedures and timelines across networks would improve transparency, reduce complexity and support a more consistent customer experience across the sector.

Acceptance triggering financial commitment and readiness obligation and progression into queue commitment framework

- 2.87 We agree with respondents that customers would benefit from greater clarity on the steps that follow offer acceptance, including the evidence requirements associated with retaining and progressing a connection. We also recognise the importance of ensuring that accepted projects are progressed through the relevant transmission and distribution processes in a timely, fair and consistent manner.
- 2.88 However, introducing highly prescriptive requirements through this package risks creating inconsistencies with existing and developing connections reform licence and code arrangements, which already establish obligations and timeframes relating to offer holders across transmission and distribution. We therefore intend to focus on improving transparency and customer understanding while avoiding duplication of requirements that are more appropriately addressed through the wider connections reform framework.
- 2.89 To support this objective, we intend to develop guidance setting out good practice expectations for customer communications following offer acceptance. This could include clear explanations of the steps required to progress a project, the evidence and milestones customers are expected to meet, how projects are progressed through relevant transmission and distribution processes, and the respective roles of DNOs, TOs and NESO.

Applying flexibility to the current acceptance period and introduction to a timeframe for network counter-signature

- 2.90 We recognise that customers have differing requirements depending on a range of variables. We also recognise the importance of acceptance periods in encouraging timely decision-making and supporting efficient queue management.

Transforming the Connections Experience: 2026 policy consultation

- 2.91 Existing acceptance periods are already defined in industry arrangements. The Connection and Use of System Code (CUSC)¹³ provides that a connection offer remains open for acceptance for three months from receipt by the user and a fixed extension period applies in limited circumstances. Rather than seeking to alter these existing acceptance periods, we consider it important that customers are able to make effective use of the time available to them. In particular, respondents highlighted concerns that customers can receive responses to complex or material queries late in the acceptance window, limiting the time available to review updated information and make informed commercial decisions. We consider these issues are best addressed through our proposals relating to post-offer queries and change control in paragraphs 2.81 - 2.84, which are intended to ensure that customers receive timely information and are able to make informed commercial decisions during the acceptance period.
- 2.92 We also recognise respondents' concerns regarding the lack of clarity and consistency surrounding network counter-signature processes but acknowledge that a universal timeframe for this activity may not be appropriate in all circumstances, given the need to validate acceptance documentation and supporting information. We therefore intend to further develop expectations regarding the acknowledgment, processing and confirmation of valid acceptances, alongside guidance which improves transparency regarding the steps that follow acceptance and expected timelines defined on a case-by-case basis.

6. Post-acceptance change control and communication

Obligation to notify all affected parties of changes (including version control and change logs) and update connection dates, costs and risks

- 2.93 We have decided to proceed with requirements to improve transparency around project changes and their impacts. We will introduce a prescriptive licence obligation on network companies to promptly inform customers of material changes affecting their project and provide them with clear information regarding any resulting impacts on connection dates, programme milestones, project costs, technical requirements, risks to delivery, dependencies on third parties, outages and wider connected projects (where relevant). We will work with industry to develop an appropriate timeframe within which networks are expected to notify customers of changes.
- 2.94 This will be supported by guidance defining key terms, as requested by network companies in our recent workshops, such as 'material change' and 'affected party' and outlining further expectations. We will also introduce requirements relating to version control and change logs to ensure greater transparency and

¹³ Paragraph 2.13.4 in [CUSC Section 02 - Connection v1.22 \(22 July 2025\).pdf](#)

Transforming the Connections Experience: 2026 policy consultation

facilitate customer understanding, with guidance detailing recommended formats and expectations for communication methods.

Clear approach for agreements to vary (ATV)/restated documents – defined timelines for assessing change requests

- 2.95 We have decided to proceed with clearer requirements governing how change requests are assessed and communicated. We consider that customers should have greater certainty regarding whether a change will be managed through an ATV, a restated document or an alternative process, and should receive timely information regarding the status of their request. We therefore intend to establish clear expectations through a prescriptive licence condition around assessment and communication timeframes, while maintaining sufficient flexibility where networks evidence dependencies on third-parties. We will work with industry to develop the appropriate timeframes for acknowledgement and assessment.

Clear process for disputes on changes/ independent escalation routes

- 2.96 We have decided not to introduce a separate licence condition relating to escalation routes and dispute resolution as part of this subsection. Instead, these matters will be taken forward through our work under Standardisation of network dispute processes and Guidance for Determinations (theme 7), which is considering how dispute resolution arrangements can be made more transparent and effective across transmission and distribution networks. Through that work, we expect customers to have access to clear and accessible routes for escalating unresolved issues and challenging decisions where appropriate.

Timeframes around formal requests for information/ queries

- 2.97 The previous consultation proposed a single minimum requirement for post-offer communications - a prescriptive licence condition for a minimum timeframe for regulated parties to respond to project-specific post-offer communications. Following feedback to the consultation and further engagement we will move forward with our proposal to introduce a prescriptive licence condition for a response timeframe but instead adjusting the focus to be a requirement to provide an initial response within a fixed timeframe, acknowledging the query, assigning ownership and providing a timeframe for a substantive response.
- 2.98 We note that this approach differs from the proposed complexity-tiered response timeframes for clarificatory queries during the post-offer acceptance window. We consider this justified given the time-critical nature of the acceptance window. Following acceptance, queries can vary significantly in type and complexity, making rigid response timeframes less appropriate.
- 2.99 This requirement is also complimented by the responsibilities we intend to set out for the assigned point of contact(s) and the requirement to operate clear process for disputes on changes/ independent escalation routes. Following this

Transforming the Connections Experience: 2026 policy consultation

publication, we will determine an appropriate timeframe for initial responses and the required content of the response.

Proactive progress updates

2.100 Alongside support for minimum response timeframes for project-specific post-offer communications, a common suggestion for an additional milestone was the introduction of a requirement for regular progress updates. In addition to experiences of inconsistent post-offer communications, limited visibility of project progress was cited as a key source of uncertainty of project progress, key milestones, emerging risks and expected delivery timescales. A strong message in consultation responses was that there was limited proactive communication regarding progress, particularly on projects involving multiple parties.

2.101 We will therefore introduce an additional minimum requirement for post-acceptance proactive progress updates. In post-consultation engagement, network companies and some customer groups highlighted that ‘regular’ progress updates may not be proportionate for all projects and prescribing a timeframe for updates may create an unnecessary administrative burden. Therefore, we have instead framed the requirement around ‘proactive’ progress updates and the need to update the customer in the event of:

- a defined project milestone/stage being completed
- a delay occurs, or is reasonably expected to occur, which may affect agreed timescales/connection date
- material change to project scope, costs, risks, dependencies and outage requirements
- a customer query or update request remaining unresolved beyond the communicated timeframe (and the reason for this)
- requirement to provide opportunity to hold a meeting to discuss any update/query/progress if requested by the customer

2.102 We have decided to introduce a prescriptive licence condition on the requirement to provide proactive progress updates with supporting guidance on material change thresholds, delay update requirements and project stages that require updates on completion. Further work is required to develop the guidance and the circumstances requiring updates to the customer. This will be developed collaboratively with industry following this publication.

2.103 The ED3 Connections incentive framework will help assess whether the post-offer communications requirements (specifically timeframes around formal requests for information/ queries and proactive progress updates) are leading to improved customer outcomes in practice. In particular, the LCCSS will be used to assess quality of pre-application engagement and customer satisfaction.

7. Delivery Stage

Transforming the Connections Experience: 2026 policy consultation

Kick-off Meeting

- 2.104 The previous consultation proposed a minimum timeframe for a formal project kick-off meeting between the network company and customer following offer acceptance. In response to stakeholder feedback, we have decided to retain a prescriptive licence condition requiring licensees to offer customers the opportunity to participate in a project kick-off meeting, but only when requested by the customer, rather than mandating for all connections and customers.
- 2.105 We recognise feedback that a single universal timeframe linked solely to offer acceptance would not be appropriate and that any timeframe should be linked to project readiness. We continue to consider it important that customers can access a timely project initiation discussion when requested, therefore we intend to establish a flexible timing requirement. Further work is required to determine the most appropriate format of this timing requirement, such as appropriate trigger points and timeframes, which will be developed collaboratively with industry to ensure they are proportionate and effective.
- 2.106 To support the effectiveness of these discussions, this requirement will be supported by guidance setting out our expectations for the quality and content of project kick-off meetings. This guidance, which will be developed collaboratively with industry following this publication, is expected to cover areas such as appropriate participants from all licensed parties involved, project scope and delivery arrangements, key roles and responsibilities, dependencies, communication arrangements and escalation routes.

Detailed design stage

- 2.107 The previous consultation proposed a single prescriptive licence condition for a minimum standard for the timeframe associated with the detailed design stage. It was noted in the proposal that any timeframe would likely vary across technology and customer types, however following consultation feedback and further engagement we have decided to adjust the focus to be a prescriptive licence condition requiring the licensed party to provide and maintain a detailed design and delivery programme, including a commissioning programme, with customer visibility.
- 2.108 We think that this approach better reflects stakeholder feedback, providing customers with greater visibility of progress, milestones, dependencies and expected delivery timescales rather than prescribing timeframes for individual design stages. The requirement will be supported by guidance on the expected content and quality of the delivery and commissioning programmes, including the activities and milestones expected to be included for different connection types and the expected timeframes for their completion. The guidance will be developed collaboratively with industry following this publication.

Transforming the Connections Experience: 2026 policy consultation

2.109 This requirement is also complimented by the introduction of minimum standards on post-offer communications and proactive progress updates, as this should improve the transparency and reduce uncertainty for customers during delivery. In addition to this, the strengthening of GSoP requirements with respect to delays aims to incentivise network companies to meet their obligations by acting as a deterrent against poor performance and avoidable delays, this is covered in further detail in chapter 3, Timely and Reliable Connections (themes 3 and 5).

Outage planning

2.110 Alongside the proposed minimum requirement at the design stage, customer respondents frequently highlighted outage planning as an area where additional standards may be beneficial. Customers cited limited visibility of outage requirements, dependencies and expected outage windows, alongside poor coordination between DNOs, TOs and NESO contributing to delays. Common suggestions included earlier booking of outage windows and minimum timeframes for agreeing outage plans.

2.111 From further engagement there was support for greater transparency around outage planning activities, including risks and dependencies that impact project progression. However, some respondents, particularly network companies, noted that outage window agreement can be difficult due to wider operational and system constraints and therefore cautioned against rigid timeframes. Network companies showed preference for earlier planning and discussion with guidance-backed requirements for engagement and coordination.

2.112 We have decided to introduce an outage planning minimum requirement in the form of a prescriptive licence condition with supporting guidance. The licence condition will detail the requirement to establish and maintain outage planning arrangements, including the requirement to communicate dependencies and impacts, engage relevant parties to coordinate activities and notify customers of changes to planned outage arrangements.

2.113 The supporting guidance will outline when outage planning should commence and be agreed, expected outage planning milestones and expectations for multi-party coordination and communication requirements. Further work will include the development of the guidance, with industry engagement, and finalising the detail to be included within the licence condition.

Survey works

2.114 Following consultation feedback and further engagement, we will proceed with a prescriptive licence condition for minimum requirements for survey works but remove the prescribed timeframe and refocus on visibility and transparency. Regulated parties will be required to provide clear information on survey requirements, expected timeframes, dependencies and customer actions, and

Transforming the Connections Experience: 2026 policy consultation

keep customers informed of survey scheduling, completion, delays or any additional surveys required.

2.115 In the previous consultation, we asked respondents to suggest which types of surveys would be appropriate to attach timeframes to, and this feedback will inform supporting guidance. The guidance will set out indicative survey types for common connection projects, information to be shared with customers, customer readiness requirements, survey outcomes and expectations for communicating resulting changes to project progression, scope, timescales or costs. The guidance will be developed collaboratively with industry following this publication.

2.116 This requirement will be supported by other post-acceptance minimum requirements, including post-offer communications, proactive progress updates and delivery programme requirements. As with the wider package of post-acceptance measures, these requirements are complimentary and intended to improve transparency, accountability and customer visibility throughout project delivery. By establishing clearer expectations for communication, coordination and project management, we aim to provide customers with a more consistent and predictable experience while ensuring requirements remain proportionate and flexible to the needs of different projects.

Decisions

2.117 In the previous consultation we presented Decisions 2.1 and 4.1 to explore the introduction of prescriptive licence conditions attached to milestones in the customer journey and for minimum standards on offer contents respectively. We also presented Decisions 2.2 and 4.2 to explore the introduction of principles-based licence conditions targeting standard of service improvements throughout the customer journey and to ensure clear communication and engagement around offers respectively. Having considered stakeholder responses, further engagement and our subsequent analysis, we now set out our decisions on the minimum standards we intend to introduce across the connections journey.

DECISION 2.1.1 - Pre-application

A. Prescriptive licence condition and supporting Ofgem-developed guidance requiring licensees to acknowledge and respond to pre-application enquiries within a fixed timeframe.

B. Prescriptive licence condition and supporting Ofgem-developed guidance requiring licensees to provide pre-application engagement within a fixed timeframe when requested by the prospective customer.

DECISION 2.1.2 - Application

A. Standardised application checklists with supporting Ofgem-developed guidance.

Transforming the Connections Experience: 2026 policy consultation

B. Principle-based licence condition for the requirement to ensure customers receive sufficient information, support and engagement to make informed decisions and submit right-first-time applications and assistance in the case of incomplete offers.

C. Prescriptive licence condition with a requirement for customers to be provided with a point of contact(s) at the point of a complete and accepted application and throughout the connection journey.

DECISION 2.1.3 - Offer Creation and Provision

A. Prescriptive licence condition for the minimum ‘core’ information that should be included in all offers, and supporting Ofgem-developed guidance the ‘enhanced minimum content’ for larger projects.

B. Ofgem-developed guidance on the provision of additional information within offers for non-standard project types.

C. Principles-based licence condition and supporting Ofgem-developed guidance on the requirement for coordination, information sharing and issue resolution across DNOs, TOs and NESO where multiple parties are involved in a connection.

D. Principles-based licence condition requirement on network companies to take reasonable steps to ensure information provided to customers is understandable, transparent and offers are factually correct.

DECISION 2.1.4 - Post-offer

A. Prescriptive licence condition for time-bound window(s) to respond to clarificatory questions and error correction requests, tiered based on complexity.

B. Prescriptive licence condition requiring licensees to operate a transparent change control process for material changes to offer and associated documentation

DECISION 2.1.5 - Offer Acceptance

A. Principles-based licence condition to provide clear and consistent acceptance procedures, acceptance timelines and customer information regarding offer acceptance and lapse arrangements.

B. Ofgem-developed guidance setting out good practice expectations for customer communications following offer acceptance.

DECISION 2.1.6 - Post-acceptance

A. Prescriptive licence condition and supporting Ofgem-developed guidance requiring licensees to notify the customer of material changes affecting their project within a fixed timeframe.

B. Prescriptive licence condition requirement to operate defined process and timeline for assessing and communicating change requests.

Transforming the Connections Experience: 2026 policy consultation

C. Prescriptive licence condition requirement to respond to formal requests for information/queries within a certain timeframe.

D. Prescriptive licence condition, with supporting Ofgem-developed guidance, requirement to provide customers with proactive progress updates.

DECISION 2.1.7 - Delivery Stage

A. Prescriptive licence condition requirement, with supporting Ofgem-developed guidance, to provide customer with project kick-off meeting, if requested, within a defined timeframe.

B. Prescriptive licence condition requirement, with supporting Ofgem-developed guidance, to provide, share and maintain detailed design and delivery programmes/ timeframe information.

C. Prescriptive licence condition requirement, with supporting Ofgem-developed guidance, to establish and maintain outage planning arrangements for connection projects.

D. Prescriptive licence condition requirement, with supporting Ofgem-developed guidance, to provide customers with clear information on required survey works.

Monitoring and Accountability

2.118 We intend for the ED3 Connections incentive to play an important role in monitoring the minimum requirements we will introduce to improve the quality and reliability of customer service across the connections journey. The LCCSS could be used to test success against measures relating to the timeliness of initial customer contact, the quality and effectiveness of pre-application engagement, the provision of clear ownership and points of contact, and the quality of communications provided throughout project delivery. This will help assess whether customers are receiving timely responses to queries, meaningful engagement and an improved overall customer experience throughout the connections process.

Areas for further policy development

Licence vs guidance

2.119 We intend to implement these requirements through a combination of licence obligations and supporting guidance. Together, these will provide a framework for delivering the customer service outcomes set out in this document. We expect the licence modifications to establish the overarching requirements, with guidance providing further detail on how those requirements may be met in practice. The guidance will be developed with stakeholder input and will reflect industry expertise and experience, while allowing for updates over time as

Transforming the Connections Experience: 2026 policy consultation

practices evolve and lessons are learned through implementation. Compliance with the guidance will be supported through the relevant licence requirements.

- 2.120 As we develop the detailed licence drafting and guidance, we will continue to consider the appropriate balance between matters that are best addressed through licence obligations and those that are more appropriately set out in guidance, taking account of consultation responses and stakeholder engagement.

Prescriptive timeframes

- 2.121 Pre-application: determine timeframe for acknowledging receipt of customer query and detailing next steps, and a timeframe within which to provide connection surgeries and further engagement (upon request). Determine appropriate customer minimum criteria for connection surgeries and pre-application discussion requests.
- 2.122 Post-offer: determine timeframe to acknowledge receipt of questions and correct errors and whether this should be categorised based on complexity (eg simple, moderate or complex error/question).
- 2.123 Post-acceptance: determine timeframes for notification of change and appropriate timeframe to acknowledge request and outline expected assessment timeframe.

Guidance

- 2.124 We will undertake further work to develop supporting guidance in the following areas:

1. Pre-application

- develop guidance setting out expectations for the content and quality of initial contact responses
- develop guidance setting out expectations on the availability, cadence and quality of pre-application engagement

2. Application

- develop mandatory, conditional and optional fields for application checklists and decide whether these should be differentiated by technology type, generation/ demand etc
- develop accessible guide for completing applications (explanation of technical terminology) and outline responsibilities of point(s) of contact

3. Offer

- agree on the finalised core, enhanced minimum and good to have offer content
- develop minimum content for non-standard projects (EHV projects and above)

Transforming the Connections Experience: 2026 policy consultation

- develop Ofgem expectations for cooperation, escalation and issue resolution across DNOs, TOs and NESO

4. Post offer

- develop definitions of what constitutes material change and who should be treated as an affected party
- develop recommended format for change logs, version control and good practice communication

5. Offer acceptance

- develop consistent acceptance procedures and timelines across network companies

6. Post acceptance

- develop definitions of what constitutes material change at this stage and who should be treated as an affected party
- produce recommended format for change logs, version control and good practice communication
- develop recommended escalation stages, the roles and responsibilities at each stage, and indicative response and resolution timeframes

7. Delivery Stage

- develop guidance setting out the expected quality and content of project kick-off meetings
- develop guidance setting out the expected quality and content of delivery and commissioning programmes
- develop guidance outlining when outage planning should commence and be agreed, expected outage planning milestones and communication expectations
- develop guidance setting out survey types for common connections projects, information to be shared with customers, customer readiness requirements, survey outcomes and expectations for communicating resulting changes

Next steps

- 2.125 The measures set out in this chapter establish the policy framework we intend to progress. However, further work is required to refine the detailed design of the licence conditions and supporting guidance.
- 2.126 Between publication of this document and statutory consultation, we will continue to engage with network companies, developers and other stakeholders through workshops and bilateral discussions, separate on each topic. We will work collaboratively to develop the implementation detail.

Transforming the Connections Experience: 2026 policy consultation

- 2.127 We intend to continue working closely with industry and customer representatives throughout autumn 2026 through a series of targeted working groups. Through this we will explore implementation considerations, including the practical application of the minimum requirements, approaches to monitoring and reporting and areas where additional guidance may be required to support consistent delivery across network companies.
- 2.128 Alongside this process, we expect to begin drafting licence conditions and guidance during late 2026, informed by feedback from stakeholder engagement. We will continue to work collaboratively with industry during the process, with the aim of ensuring licence conditions and guidance are practical, proportionate and supports the consistent implementation of minimum requirements across the energy sector.
- 2.129 We will also engage with stakeholders to develop monitoring arrangements through the ED3 processes, including customer satisfaction surveys and reporting, and ensure these reflect the decisions and licence changes set out in this publication.

Questions

Please provide evidence to support your views.

Q2.1.1 Do you agree with the decisions we have set out for Minimum Requirements Across the Connections Journey (decisions 2.1.1. – 2.1.7.)?

Q2.1.2 Are there any additional considerations relevant to this area (decisions 2.1.1. – 2.1.7) that you consider we should take into account?

Transforming the Connections Experience: 2026 policy consultation

2.2 Ambitious Options for Customers (theme 5)

Section summary

This section considers how network companies should ensure that connection offers are both ambitious and achievable. It examines stakeholder views on energisation window and Opt-in mechanism proposals that focus on allowing customers to access earlier or alternative connection opportunities. The section sets out our proposed definition of an ambitious offer, explains our decisions, and outlines areas where further policy development is required. It also considers how these proposals interact with wider reforms on offer quality, transparency and accountability.

Problem statement (from original November 2024 consultation)

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

Goal (from original November 2024 consultation)

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

Summary of stakeholder views

2.132 Stakeholders broadly supported the objective of encouraging more ambitious connection offers, but views differed on whether a new licence obligation was the most appropriate way to achieve this.

2.133 A recurring theme was that ambition should not be equated with optimism or with offering the earliest technically conceivable date. Stakeholders stressed that connection dates should remain realistic, reliable and grounded in known technical and regulatory constraints. The consultation responses also highlighted the importance of distinguishing between factors within a network company's control and dependencies relating to customers, third parties, system planning, consenting and other delivery bodies.

2.134 Several network companies raised concerns regarding subjectivity and enforceability. These stakeholders noted that the concept of ambition would require clear criteria or guiding principles if it were to be applied consistently. They emphasised that ambition should remain grounded in what is deliverable, supported by transparent processes when dates change, and capable of recognising factors outside the control of network companies. Some TOs also argued that additional licence obligations could introduce unnecessary rigidity

Transforming the Connections Experience: 2026 policy consultation

and complexity and suggested that implementation detail may be better set out in supporting guidance or associated documents.

2.135 A number of DNOs argued that Ofgem would need stronger evidence that additional regulatory interventions are addressing genuine performance gaps and risks within network company control. At the same time, some network companies acknowledged that appropriately designed financial or reputational incentives could help encourage behaviours that support better customer outcomes.

2.136 Developers, customer representatives and other connection customers generally placed greater emphasis on transparency and accountability. These stakeholders highlighted the importance of customers having sufficient information to understand and challenge connection dates where necessary. They also called for improved offer content, greater visibility of assumptions and dependencies, and stronger accountability where network companies fail to meet expected standards.

2.137 Trade associations, customer representatives and larger connection customers emphasised that different projects have different needs. While earlier connection dates may be valuable in some circumstances, many respondents stressed that certainty and reliability remain critical. These stakeholders argued that the quality and credibility of an offer may be more important than simply securing the earliest possible date.

2.138 The responses therefore showed support for the policy objective, alongside significant concern that an undefined or poorly evidenced obligation could be difficult to apply consistently and could encourage either overly cautious or overly optimistic dates.

2.139 Subsequent workshop engagement reinforced this distinction between ambition and optimism. Stakeholders repeatedly returned to the need for assumptions, constraints, dependencies, critical-path milestones and confidence in delivery to be visible to customers. The central message was that customers need to understand why a date is credible, rather than simply being given an earlier date.

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

2.140 The energisation window proposed a start date acting as an ambitious target and an end date acting as a backstop. Stakeholders were cautiously supportive of the concept, recognising that a window could communicate delivery uncertainty more effectively than a single date and potentially improve transparency and customer planning. However, significant concerns remained about how the mechanism would operate in practice.

Transforming the Connections Experience: 2026 policy consultation

- 2.141 NESO considered that the front date might be ignored in practice, leaving the backstop as the effective connection date. They suggested that a single connection date, supported by incentives for early delivery and consequences for delay, would be preferable.
- 2.142 One developer respondent did not support an energisation window as the default approach. It argued that developers and investors would be likely to treat the backstop as the only financeable date, reducing the value of the front date and introducing further uncertainty. Another respondent suggested that a target connection date with a tolerance period could be a possible alternative.
- 2.143 Some DNOs have identified potential benefits but cautioned against Ofgem mandating the length of the window. They considered that incentives could define the ambitious front of the window and minimum standards could define its back end, subject to deliverability and reasonable costs.
- 2.144 Other feedback highlighted the need to tailor any window to project type and complexity, recognise dependencies outside network company control and avoid creating an additional layer of requirements alongside existing offer, delivery and reporting arrangements.
- 2.145 Stakeholders therefore identified potential value in communicating both ambition and delivery uncertainty but did not demonstrate a clear need for a separate regulatory mechanism, as this type of information could already in theory be provided through offer documentation, delivery programmes or existing network practice.

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

- 2.146 Stakeholders generally supported the principle of allowing customers to be offered / accept an earlier connection opportunity where one becomes available, provided the mechanism is voluntary, transparent and fair. A trade association respondent also considered that optionality would protect more complex projects that require stable and reliable dates from being assigned earlier dates that they did not want or could not meet.
- 2.147 Stakeholder engagement also indicated that an earlier opportunity may not simply be an earlier version of the same connection offer. It could include a different connection proposition, such as flexible, non-firm access, phased or staged access. Workshop feedback therefore placed particular importance on explaining the implications and trade-offs attached to any alternative opportunity.
- 2.148 Stakeholders recognised that these alternative access arrangements could enable some customers to connect earlier than would be possible through a firm, full-capacity connection. However, the workshop also highlighted that the current process for identifying, describing and offering different access products is not

Transforming the Connections Experience: 2026 policy consultation

standardised. Customers may therefore receive different information or face different processes depending on the relevant network company.

2.149 Stakeholders also identified unresolved questions concerning:

- the circumstances that should trigger an Opt-in opportunity
- which customers should be eligible
- how opportunities should be allocated
- how queue impacts should be managed
- the interaction with firm, non-firm access, flexible and phased connection products
- the information customers should receive before deciding whether to opt in

2.150 Overall, stakeholders supported the principle of a voluntary mechanism that allows customers to access earlier or alternative connection opportunities where these become available. However, support was primarily focused on customer choice, transparency and fairness rather than any specific implementation model. Respondents consistently highlighted the need for clear customer information, appropriate safeguards and transparent allocation arrangements.

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

2.151 Several respondents suggested comparative league tables or benchmarking to increase accountability for ambition. An independent external audit was also proposed as a way of assessing whether network companies were demonstrating the expected behaviours. Respondents raised concerns that different parties involved in determining connection dates may approach delivery risk differently, potentially resulting in inconsistent outcomes for customers. Some respondents suggested that estimates may not always be calibrated consistently across different organisations involved in the connections process. Respondents therefore emphasised that any comparison would need to recognise the respective roles and responsibilities of DNOs, TOs and NESO.

2.152 At the theme 5 workshop, stakeholders showed greater support for a contextual scorecard than for either a simple transparency dashboard or an audit-backed rating. The workshop feedback indicated that stakeholders supported comparison, benchmarking and visibility only where project context and complexity were recognised and comparisons were fair. Concerns included factors outside network company control, project variability, customer impacts and transmission dependencies.

2.153 These considerations are relevant to both distribution and transmission, particularly where the connection date depends on coordinated action by DNOs, TOs and NESO.

Transforming the Connections Experience: 2026 policy consultation

Our response and analysis

Scope

- 2.154 Customers do not always have sufficient confidence that the connection date in their offer reflects the earliest realistically deliverable outcome. In some cases, customers have limited visibility of the assumptions, constraints and dependencies underpinning the date, making it difficult to judge whether an offer is genuinely ambitious, appropriately cautious or unnecessarily conservative.
- 2.155 There is also an important interaction with the measures discussed under Timely and Reliable Connections (formerly Theme 3). Stronger accountability for meeting agreed connection dates could unintentionally incentivise network companies to offer later dates to reduce the risk of delay, penalties or compensation.
- 2.156 Customers also have different requirements and expectations. Some customers prefer the earliest available opportunity, including where this involves a flexible or alternative connection arrangement. Others require a stable date against which they can plan financing, procurement, construction and wider project milestones. The challenge is therefore not simply to require earlier dates. It is to ensure network companies identify and offer the earliest outcome that can realistically be delivered, taking account of reasonable customer expectations, and explain the basis on which that date has been determined.
- 2.157 We must therefore manage two related risks: connection dates that are unnecessarily conservative and connection dates that appear ambitious but are not supported by a realistic delivery pathway.
- 2.158 The proposals in this chapter are intended to require coordinated action across electricity distribution, electricity transmission and system operator licence frameworks. DNOs, TOs and NESO each play a role in determining, supporting or communicating connection dates and identifying alternative connection opportunities. Through this publication, we are seeking views on the detailed design and implementation of the Opt-in mechanism. The detailed development of performance visibility arrangements is discussed within the Timely and Reliable Connections (themes 3 and 5) chapter.
- 2.159 The precise application of the obligation across DNOs, TOs and NESO, and across different market segments and connection types, remains subject to further consultation and licence drafting.
- 2.160 We recognise that the appropriate implementation may differ between transmission and distribution and between connection projects of different sizes and levels of complexity. Through this publication, we are therefore seeking views on whether any market segments should be excluded or require a proportionate alternative approach.

Transforming the Connections Experience: 2026 policy consultation

- 2.161 The Opt-in mechanism may also require different responsibilities across DNOs, TOs and NESO, particularly where an earlier opportunity depends on changes to transmission works, system planning assumptions or the type of network-access product offered. We will clarify these responsibilities through further policy development and licence drafting.
- 2.162 The framework will be designed to operate alongside, rather than duplicate, the reforms under 2.1 Minimum Requirements Across the Connections Journey (themes 2 and 4) and Timely and Reliable Connections (themes 3 and 5):
- Timely and Reliable Connections (themes 3 and 5) will address accountability for meeting agreed dates
 - 2.1 Minimum Requirements Across the Connections Journey (themes 2 and 4) will address the quality and information content of connection offers
 - 2.2 Ambitious Options for Customers (theme 5) will establish the outcome expected when the connection date is set and provide customers with access to earlier opportunities where appropriate

Working definition of ambition

- 2.163 Following consultation and subsequent stakeholder engagement, we have developed the following proposed working definition:

“An ambitious offer is one that reflects the earliest realistically deliverable outcome, taking account of reasonable customer expectations.”

- 2.164 Workshop feedback reinforced the importance of assessing ambition from the customer’s perspective. Stakeholders repeatedly emphasised that customers need to understand why a date is credible, not simply be provided with an earlier date. The workshop identified assumptions, constraints, dependencies, critical-path milestones and the confidence attached to a date as potentially important information supporting customer understanding.
- 2.165 We recognise that some network companies are concerned that the concept of ambition may remain subjective. However, we consider that the absence of an explicit expectation around ambition leaves a material gap in the regulatory framework. A connection date may be deliverable without being ambitious if a network company has not properly considered whether an earlier realistic outcome is available. Conversely, an earlier date should not be treated as ambitious if it is based on assumptions that are unlikely to be realised or does not reflect the customer’s project requirements.
- 2.166 We have carefully considered network company concerns about subjectivity, dependencies and enforceability. However, we continue to consider that a specific regulatory expectation relating to ambition is necessary. Without it, stronger delivery requirements could incentivise unnecessarily conservative connection dates, reducing the customer benefit of the wider reforms.

Transforming the Connections Experience: 2026 policy consultation

- 2.167 The proposed obligation does not require network companies to provide an optimistic date or the earliest technically conceivable date. It requires the earliest outcome that can realistically be delivered. This provides flexibility to recognise legitimate technical, regulatory and third-party constraints while establishing a clear expectation that earlier realistic opportunities should be properly considered.
- 2.168 The reference to **reasonable customer expectations** is important. It recognises that ambition should be judged not only against network capability, but also against what the customer needs and could reasonably expect on the basis of the information available. It does not mean that a customer's requested date must automatically be accepted. Rather, network companies should be able to explain where the offered date differs from the customer's expectations and what prevents an earlier outcome.
- 2.169 This customer-focused definition is intended to ensure that ambition has practical value. An earlier date that a customer cannot reasonably plan around, finance or deliver against may not result in a better customer outcome. Equally, a stable date should not be treated as sufficient where an earlier realistic and beneficial outcome has not been explored.

Energisation Window

- 2.170 We recognise that an energisation window could provide customers with greater visibility of delivery uncertainty and that some DNOs already provide backstop dates as part of their existing approach. Where this helps a customer understand the expected delivery range and associated risks, we consider that it can remain useful, good practice.
- 2.171 However, we do not consider that a separate regulatory energisation-window mechanism would add sufficient value to justify the additional complexity. The stakeholder evidence indicates a material risk that customers, investors and network companies would treat the backstop as the effective connection date, potentially weakening rather than strengthening the ambition of the offer.
- 2.172 A separate window requirement could also duplicate or overlap with:
- the obligation to provide an ambitious yet achievable date
 - requirements concerning the content, assumptions and dependencies within connection offers set out in 2.1 Minimum Requirements Across the Connections Journey (themes 2 and 4)
 - delivery accountability and consequences for delay set out in Timely and Reliable Connections (themes 3 and 5)
 - existing network practices where target and backstop dates are already communicated

Transforming the Connections Experience: 2026 policy consultation

- 2.173 Introducing a separate regulated mechanism could therefore make the connections process harder for customers to understand without materially improving the ambition of offers.
- 2.174 We have therefore decided not to progress the energisation window as a separate regulatory mechanism. This decision is intended to simplify the overall package and avoid requiring networks and customers to navigate another distinct regulatory process where the intended outcomes can be achieved through other measures.
- 2.175 This decision does not prevent network companies from continuing to provide target dates, backstop dates or delivery ranges. We encourage networks to retain or develop these approaches as good practice where they provide customers with useful information, are proportionate to the project, clearly explain the status of each date and do not obscure the principal contractual connection date.

Opt-in mechanism for earlier connection dates, to provide optionality for customers to accept earlier connection dates

- 2.176 We agree that an Opt-in mechanism could benefit customers by increasing choice without imposing earlier dates or alternative arrangements on customers who prioritise certainty.
- 2.177 The mechanism could also support the ambition obligation by encouraging network companies to identify earlier or alternative connection opportunities rather than treating the original offer as fixed where circumstances subsequently change.
- 2.178 An Opt-in mechanism could include an earlier date for what is largely the same connection arrangement. It could also include earlier access through a different connection proposition, such as a flexible, non-firm access, phased or staged connection. These products can support earlier access where full firm capacity is not yet available, but they may change for example the capacity available to the customer, the circumstances in which access can be restricted or the future works needed to provide a firm connection.
- 2.179 Customer clarity is therefore central to the proposal. Before opting in, customers would need to understand the nature of the opportunity, how it differs from the existing offer, the associated risks and constraints, and any implications for firmness, capacity, phasing, curtailment, cost or queue position.
- 2.180 However, the evidence does not yet support a final decision on the mechanism's detailed design. Further work is needed to determine how opportunities would be identified and allocated fairly and how the mechanism would interact with queue arrangements and the offer-quality requirements developed under 2.1 Minimum Requirements Across the Connections Journey (themes 2 and 4).

Transforming the Connections Experience: 2026 policy consultation

- 2.181 Our objective through this proposal is not to prescribe the technical design of connection products, determine how capacity is allocated, or standardise firmness arrangements. We recognise that the development of alternative access arrangements and any associated regulatory, code or licence changes may need to be progressed through separate industry and regulatory processes. We encourage industry to continue developing proposals where changes are needed to support customer outcomes and efficient use of network capacity.
- 2.182 We are already progressing practical solutions through the TCD work programme. Stakeholders have highlighted that terms such as "firm" and "non-firm" are used inconsistently across the sector and can mean different things in different contexts. Emerging TCD discussions therefore point towards clearer communication of connection restrictions and customer impacts, rather than reliance on terminology that may be interpreted differently across industry.
- 2.183 Our focus through this proposal is therefore not on defining or standardising the underlying connection products themselves. Rather, we are seeking a more transparent and consistent framework for customer engagement and information provision. This would help ensure that customers are made aware of relevant opportunities, understand any associated restrictions, trade-offs and risks, and receive sufficiently clear and comparable information to make informed choices that could lead to accelerated connection dates, regardless of which network company they engage with.
- 2.184 Pending any formal mechanism, we would expect network companies to continue engaging proactively with customers on alternative connection opportunities where these are available. Customers may already be able to explore options such as restricted, flexible, phased or staged access under existing arrangements. Our objective is not to prevent such engagement, but to consider a more transparent and consistent framework across the sector. Ongoing guidance work may support a more consistent and transparent approach to these discussions across industry while any longer-term regulatory changes are considered.
- 2.185 Any future Opt-in mechanism would need to ensure that:
- alternative connection options and any associated trade-offs are clearly explained to customer
 - participation is genuinely voluntary
 - customers are provided with clear and transparent information about how opportunities are identified and allocated
 - customers understand whether the opportunity changes the firmness, capacity, phasing or other terms of the connection
 - responsibilities across DNOs, TOs and NESO are clearly defined

Transforming the Connections Experience: 2026 policy consultation

- 2.186 Through this publication, we are seeking stakeholder views on the principles and design considerations that should underpin the mechanism, including customer safeguards, transparency requirements, eligibility considerations, information provision, allocation transparency, queue interactions and the communication of alternative access arrangements.
- 2.187 We will use responses to this consultation, together with targeted stakeholder engagement following publication, to refine the mechanism before developing any associated licence wording or guidance for statutory consultation.
- 2.188 Note that within Demand Connections Reform, we have identified that phased connection agreements may present an opportunity for positive outcomes for demand connecting customers and network operators. We are considering options regarding mandatory disclosure of intended ramp rates and utilisation factors, and how this might work together with alternative connection agreements. These are separate to the Opt-in measures discussed herein and we will consult on these proposals separately via Demand Connections Reform.

Performance visibility and comparative reporting

- 2.189 See paragraphs 3.77 - 3.85 in the Timely and Reliable Connections chapter for proposed measures for monitoring ambitious delivery of connections.

Decisions

Decision 2.2.1 - Ambitious yet achievable connection offers definition

We have decided to introduce a new principles-based obligation requiring network companies to provide ambitious yet achievable connection offers.

The licence obligation will establish the core outcome expected from network companies. Supporting guidance may explain how network companies can demonstrate that they have taken account of reasonable customer expectations and how the obligation interacts with different project types, dependencies and access arrangements.

Decision 2.2.2 - Energisation window

We have decided not to progress the energisation window as a separate regulatory mechanism.

This does not prevent network companies from continuing to use target dates, backstop dates or delivery ranges where these provide customers with useful information. We encourage network companies to retain or develop these approaches as good practice where they are proportionate, clearly explained and do not obscure the principal connection date.

Decision 2.2.3 - Opt-in mechanism

Transforming the Connections Experience: 2026 policy consultation

We have decided to develop a standardised Opt-in mechanism through which customers can voluntarily accept earlier or alternative connection opportunities where these become available.

The mechanism will be supported through licence obligations and guidance, with the detailed design to be developed following consultation and stakeholder engagement.

Areas for further policy development

2.190 We will undertake further work to develop supporting guidance and licence obligations in the following areas:

- the proposed working definition of ambition, “An ambitious offer is one that reflects the earliest realistically deliverable outcome, taking account of reasonable customer expectations”:
 - the scope of the ambition obligation across DNOs, TOs and NESO
 - the application of the ambition obligation across different market segments and connection types
 - the content of supporting guidance relating to ambition and reasonable customer expectations
- opt-in mechanism:
 - information that should be provided to customers before opting in
 - transparency requirements around the opportunity being offered
 - communication of restrictions, trade-offs and risks
 - customer understanding of firm/non-firm access/flexible/phased and other access arrangements
 - customer safeguards
 - the respective responsibilities of DNOs, TOs and NESO
 - communication of eligibility considerations
 - interaction with existing queue and access arrangements

Next steps

2.191 We will use responses to this consultation, together with targeted stakeholder engagement, workshops and bilateral discussions, to refine the detailed design of the measures outlined in this chapter.

2.192 After publication, we will use consultation responses and targeted engagement with DNOs, TOs, NESO, connection customers and other relevant stakeholders to:

- refine the proposed definition of ambition and supporting guidance
- clarify the scope of the ambition obligation across parties, market segments and connection type
- develop eligibility, allocation and customer-protection principles for Opt-in
- clarify the interaction between Opt-in and different network-access products

Transforming the Connections Experience: 2026 policy consultation

2.193 Following this work, we expect to design a guidance document and consult on licence modifications through the statutory consultation process.

Questions

Please provide evidence to support your views.

Q2.2.1 Do you agree with the decisions we have set out for Ambitious Options for Customers (decisions 2.2.1 – 2.2.3)?

Q2.2.2 Are there any additional considerations relevant to this area (decisions 2.2.1 – 2.2.3) that we should take into account?

Transforming the Connections Experience: 2026 policy consultation

3. Timely and Reliable Connections (themes 3 and 5)

Section summary

This section considers how network companies can be held to greater account for delivering connections on time, and how customers should be protected / compensated when delays occur. It summarises stakeholder views on strengthening the GSoPs framework, introducing stronger financial recourse for transmission customers through LDs, and improving transparency through delivery performance reporting. The section explains our assessment of the options raised through consultation and stakeholder engagement, sets out our decisions on GSoPs and future work on LDs, and outlines proposed approaches to monitoring, reporting, and performance visibility across the connections journey.

Problem statement (from original November 2024 consultation)

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

Goal (from original November 2024 consultation)

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

Summary of stakeholder views

- 3.3 In our end-to-end review 'Next steps' publication, we asked stakeholders questions regarding the proportionality and design specifics of 1) strengthening of the current GSoPs framework which currently applies to distribution connections, and 2) expanding this framework onto TOs. We also discussed the potential use of greater-than-zero Liquidated Damages (LDs) in connection agreements to better incentivise timely delivery and provide recourse to customers in the event of a delay. This section covers the summary of the responses by question.

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

Transforming the Connections Experience: 2026 policy consultation

- 3.4 Overall, the majority of respondents supported our proposals to strengthen the GSoP framework. It was suggested that doing so would ensure connection dates were more reliable.
- 3.5 There was also general support for expanding GSoPs to cover TOs. Connections customers who agreed felt that there was currently little accountability for TOs, and limited to no customer recourse or dispute options when connections are delayed.
- 3.6 Current GSoP values, which can be found in Appendix , were considered ‘token payments’ by customers. The values were not considered meaningful or proportionate. As such, GSoPs were viewed as neither a sufficient deterrent to perceived current behaviours including delays in connection dates, nor proportionate to the losses incurred by the connecting party.
- 3.7 Regarding specific design points, the current milestone-based GSoPs design was considered the preferred approach. Some developers, trade associations, and EV charging network developers offered recommendations for additional possible milestones:
- completion of network studies or surveys
 - design acceptance or completion
 - delivery of Transmission Works
 - communication of delays
 - construction commencement
- 3.8 Some developers and trade associations suggested that GSoPs relating to delivery should be associated with higher compensation payments. Some proposed that values should be scaled or tiered, meaning that financial compensation would vary depending on a range of factors, such as project size, value of project, voltage, and technology requirements.
- 3.9 Concerns about strengthening GSoPs were raised by some developers, as well as some DNOs and TOs. These respondents warned that this might encourage network operators to offer overly conservative connection dates, which would weaken customer outcomes. There was disagreement over whether larger and more complicated projects should be excluded due to complexities in design, delivery, and implementation. A few stakeholders raised concerns over whether any value that was not fully compensatory could be meaningful or proportionate enough.
- 3.10 DNOs offered cautious support for increased accountability for delays to delivery of connections, but favoured more transparent reporting mechanisms rather than strengthened GSoPs. They generally considered current GSoPs sufficient to deter delays, particularly when combined with current price control incentives and regulatory obligations.

Transforming the Connections Experience: 2026 policy consultation

- 3.11 Some DNOs argued that standardised and date-based GSoPs would not work for bespoke or complex projects without exceptions for dependences outside of DNO control, eg customer readiness or the project relying on third-party works.
- 3.12 TOs highlighted that transmission connections are inherently bespoke, with long lead times and are highly interdependent on other process, eg NESO processes and planning consents. They also explained that date-based GSoPs would risk oversimplifying delivery responsibilities and result in overly conservative connection dates being offered. There was also concern over double penalties through both GSoPs and price-control mechanisms.

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

- 3.13 There was strong consensus amongst customer-representing respondents, with near-total support for greater transparency.
- 3.14 This included support for the regular publication of a league table tracking DNOs performance against GSoPs in a public and easily accessible setting. Common required considerations for these public reports were that they should be reported monthly or quarterly, and they must include:
- an exact number of delays, failures, and how many payments were made
 - the number of on-time connections compared to delayed connections
 - categories of delay
 - explanations for delayed connections
- 3.15 Multiple connection customers suggested that these comparative reports / league tables should be made publicly available through Ofgem's website, or another easily accessible website.. The metrics should be consistent across network companies to enable comparative accuracy. Yearly audits by external companies were also suggested by some respondents.
- 3.16 Some respondents raised concerns, noting that publishing reports or league tables may increase administrative burden on DNOs, which they considered may increase costs as this is passed on to customers through connection charges.
- 3.17 DNOs agreed that reporting needed improving but also raised similar concerns. They also suggested that this could increase the administrative burden and risk of duplicating current and future ED3 mechanisms for connections performance reporting as set out in the ED3 Business Plan Guidance¹⁴ and the Sector Specific Methodology Decision.¹⁵

¹⁴ [Business plan guidance: electricity distribution price control \(ED3\) | Ofgem](#)

¹⁵ [ED3 Sector specific methodology decision core document.pdf](#)

Transforming the Connections Experience: 2026 policy consultation

- 3.18 DNOs also advised that any new arrangements must clearly separate network-caused and non-network causes of delay. They also warned that league tables were too simplistic and do not reflect differences in project types or local conditions.
- 3.19 TOs agreed that public connections delivery reporting, such as the Timely Connections Report, needed improving.¹⁶ They highlighted that reporting must reflect the interdependency between TOs and NESO. They echoed DNOs' concerns that simplistic reporting might create misleading impressions of underperformance where delays are outside of TO control, eg consenting issues, system design changes, or re-optimisation.

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

- 3.20 Most connections customers agreed with the further exploration of introducing LDs. They suggested that this mechanism would address the imbalance of risk on the side of the customers, given they currently bear all risks and associated financial impacts of connection delays.
- 3.21 Stakeholders raised different considerations for transmission and distribution as set out below.

Transmission

- 3.22 Implementing LDs at transmission level received strong support from transmission connection customers. They argued that the provision of LDs would address the imbalance of risk on the side of the customer, but also address the perceived imbalance of power where a customer is interacting with a monopoly service provider. It was repeatedly mentioned that LDs would strengthen the accountability for connection delivery of TOs and provide increased financial security for stakeholders. Moreover, it was considered that LDs for transmission would attract more investors due to feeling more secure that the mentioned risks will be addressed.
- 3.23 The stakeholders who disagreed felt that LDs could raise customer costs in response to the shifting of risk onto network companies. They also expressed concerns about increasing the legal complexity for projects and leading to overly conservative connection dates in offers.
- 3.24 All three TOs disagreed with introduction of LDs in connection agreements, stating that this would create a high risk of defensive measures being adopted to mitigate risk, ie possibly conservative dates and higher costs factored into the

¹⁶ [Timely Connections Report - 2024-25.pdf](#)

Transforming the Connections Experience: 2026 policy consultation

agreements. They also considered that there would be difficulty in isolating TO responsibility from NESO or external factors outside of TO control, adding to complexity.

Distribution

- 3.25 Those who agreed wanted LDs to work alongside the strengthening of GSoPs, rather than replacing them.
- 3.26 However, questions of implementation feasibility, particularly for distribution connections, were raised. Respondents noted that DNOs connection offers are generally not structured as contracts containing a guaranteed connection date in the way transmission arrangements are. They argued that introducing LDs could therefore require new contractual arrangements being introduced before such provisions could be applied.
- 3.27 DNOs all disagreed with the introduction of LDs in distribution connection agreements. They argued that the costs associated with LDs and increased level of risk would ultimately need to be recovered from customers through higher connection charges. As a result, they considered that LDs could increase costs for customers without necessarily providing an incentive for DNOs to improve delivery performance.
- 3.28 Some DNOs suggested that, if LDs were to be considered, it should be done very carefully to ensure fairness. They added that LDs should be strictly limited to delays fully within the DNOs control, and very tightly capped to ensure proportionality.

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

- 3.29 Customer-representing parties wanted more transparent and frequent communication around delays and more timely notice, and not retrospective explanations after the connection date had passed.¹⁷
- 3.30 There was a strong support for clearer, more standardised, and faster dispute paths to complement these measures. Respondents believed that alternative redress mechanisms, if disputes cannot be made faster, must also be clearer.¹⁸
- 3.31 There were strong calls by street lighting groups, EV charging groups, IDNOs, energy suppliers, DNOs and trade associations to understand if these measures would include IDNOs and ICPs.

¹⁷ We have addressed this point in paragraphs 2.93, 2.94 and 2.100 to 2.103 of chapter 2.

¹⁸ We have addressed this point in paragraph 2.96 of chapter 2 and chapter 0'.

Transforming the Connections Experience: 2026 policy consultation

Our response and analysis

Scope

- 3.32 Through the consultations and stakeholder engagement conducted to date, as well as through wider stakeholder communications outside of the end-to-end review, transmission and distribution connection customers have consistently highlighted that connection delays are already resulting, and will likely continue to result, in substantial consequences for them, including increased financing costs, increasing contractual liabilities, deferred revenues and, in some cases, project cancellation. In some cases, these delays are unavoidable and outside of the control of the network company, however in others it is apparent that the network company is at fault.
- 3.33 As set out in our previous consultation we continue to consider that detriment incurred by customers because of avoidable delays attributable to TOs and DNOs is unacceptable, particularly given that these delays can be introduced unilaterally by a network company with no input from customers. We agree with stakeholders that there exists a significant imbalance between the risk and financial consequences borne by connecting customers, and the penalties and accountability mechanisms for network companies where delays occur. This needs to be rebalanced.
- 3.34 The intent of the Connection GSoPs as they currently exist at distribution level was to function as a deterrent to prevent delays, rather than act as a compensation mechanism to reimburse impacted customers. Connection costs are much higher than when the original values were set, and we consider the GSoP values are now too low to achieve the original deterrent intent, despite being index-linked. We therefore intend to strengthen them. The framework will continue to apply to the same categories of customers currently within scope, including both generation and demand customers. We will also review whether the framework should continue to be structured around existing voltage levels (LV, HV and EHV) or whether an alternative approach based on connection capacity would provide a more proportionate basis for determining eligibility and payment values.
- 3.35 At transmission level, we are minded to strengthen LD arrangements that would apply to all transmission-connected customers. We will be reviewing current arrangements within the next three months.
- 3.36 Alongside this, we will develop delivery reporting mechanisms to ensure transparency of how these frameworks are operating in practice, applying to both TOs and DNOs. Development and implementation of these options remain subject to further consultation. We are seeking views on this through this publication.

Transforming the Connections Experience: 2026 policy consultation

3.37 Table 1.1 shows a breakdown of current and intended customer protection and compensation mechanisms discussed in this section. The proposals in this chapter aim to address this imbalance of financial risk borne by connecting customers. We think it is important that these measures are in place soon to protect connecting customers, support alignment with strategic plans, and lead to a cleaner, more secure, lower cost energy system.

Table 1.1 Current and intended customer protection and compensation mechanisms

	Distribution	Transmission
Current delay deterrence mechanisms	GSOPs and licence conditions	Existing licence, code and contractual obligations
Current compensation mechanism	Limited compensation via GSoPs	Potential for compensation via LDs
Current Ofgem position on limitations of existing framework	GSoPs exist, but values are too low	LDs framework exists but rarely utilised (£0 LD values common)
Proposed reform	Recalibrate/strengthen existing GSoPs	Strengthen existing LD arrangements
Policy objective	Stronger deterrence against avoidable delays, with enhanced customer redress	Stronger deterrence against avoidable delays, with enhanced customer redress

Strengthening GSoPs at distribution level

3.38 We have considered the following aspects related to strengthening GSoPs:

- increasing the value of individual GSoP payments
- assessing whether linking payment values to project capacity, rather than voltage category, would provide a more effective form of redress and a stronger incentive to avoid delays
- introducing additional milestones that better reflect the customer journey and/or placing greater emphasis on delivery-related milestones, such as commencement of works, completion of works, and project energisation

Transforming the Connections Experience: 2026 policy consultation

Increasing GSoP payment value

- 3.39 The current connection GSoP values are based on payment amounts established in the 2015 Regulations and subsequently updated for inflation in 2023.¹⁹ The 2023 review did not seek to establish payment values through a new assessment of customer detriment; rather, it updated the existing values to reflect inflation and introduced an ongoing, annual indexation mechanism.
- 3.40 We therefore agree that the current GSoPs values do not provide an effective deterrent against delays. They are neither sufficiently meaningful in value nor proportionate and are not reflective of current market conditions as connection charge costs have risen substantially, beyond indexation. As a result, they do not sufficiently influence delivery behaviour or inform decision making, contributing to cases of poor delivery performance and customer detriment.
- 3.41 We also agree that strengthening GSoPs, ie increasing the value of automated GSoP payments, should act to increase the reliability of connection dates and other GSoP milestones, and ensure that delays have more material consequence for DNOs where at fault. This, in combination with stricter minimum licence requirements across the connection journey to ensure consistent standards of service and performance, will provide a sufficiently strong incentive for network companies to deliver on time and improve accountability where standards are not met.
- 3.42 Our intent for GSoP values going forward is that:
- they should provide sufficient incentive for network companies to provide good service and meet their obligations
 - they must function as an active deterrent against poor performance and avoidable delays
 - they should be more proportionate than current values are to customer losses incurred, but it is not necessary to cover 100% of these
 - the GSoP milestones should be applicable to the broadest possible range of connection projects, from LV to EHV
- 3.43 We explored three approaches to strengthening GSoP values in response to the previous consultation. Two options addressed only the completion of works milestone, linking the compensation value payable against project ‘value’:
- The first was a relative compensation model, where payments varied according to the total project cost.

¹⁹ [Final Decision and Statutory Instrument on Guaranteed Standards of Performance \(GSOPs\) for Reliability and Connections | Ofgem](#)

Transforming the Connections Experience: 2026 policy consultation

- The second was a staged compensation model, where payments varied according to both project ‘value’ and the extent of the delay.

Stakeholders considered these approaches more proportionate than current levels.

- 3.44 We concluded however that these approaches would not be viable as there must be a consistent methodology applied across all GSoPs, rather than linked to just the completion of works milestone.
- 3.45 We also considered a third option, which would extend a project value-based approach across the wider suite of GSoP milestones, rather than applying it solely to the completion of works milestone. Although this option aligned more closely with the structure of the existing framework, we concluded that it would be operationally undeliverable, subject to highly subjective judgements regarding project value, and risk conflicting with existing DNO non-discrimination obligations.
- 3.46 Our favoured approach is expansion of the current framework by raising the values of all automated payments, irrespective of project value. Instead, payment values would be tied to either voltage categories, in accordance with the current framework, or project capacity as discussed in 3.49 - 3.50. Our preferred model also places greater weight on delivery-related milestones as discussed in 3.53. This was informed by webinars and questionnaires issued to both stakeholders and network companies.
- 3.47 We recognise the concern that increased GSoP values might encourage network operators to offer overly conservative offers to mitigate risk. In mitigation however, we consider that, if introduced, the new minimum requirements discussed under section 2.1 Minimum Requirements Across the Connections Journey (themes 2 and 4) will act to protect against this through stricter date transparency requirements and delivery reporting obligations set out in the Timely and Reliable Delivery Reporting section.

GSoP – voltage considerations

- 3.48 While current GSoPs are separated by project voltage, stakeholders have suggested that project capacity may provide a more optimal basis for determining compensation. We recognise that voltage is not always a reliable indicator of the scale, complexity or value of a connection project. Projects connected at the same voltage level can vary significantly in capacity and in the consequences of delays. We therefore intend to further explore separating values by capacity rather than voltage.
- 3.49 The commencement of works GSoP payment is currently a flat fee of £35 a day across all voltage levels. While we intend to further explore a capacity-based approach for GSoPs overall, should voltage categorisation be retained for this metric, we consider it would be more appropriate to differentiate commencement

Transforming the Connections Experience: 2026 policy consultation

of works payments by voltage level (ie LV, HV and EHV), consistent with the approach used for other delivery-related GSoPs.

Milestones

- 3.50 Regarding the suggested milestones and design options, we agree that there is merit in exploring a number of the proposals already put forward by stakeholders. However, we note that not all suggested milestones will be suitable for inclusion within the GSoPs framework. The connection journey encompasses a wide range of projects across different voltage levels and connection types. Therefore, GSoP milestones must focus on key stages that are common to the widest possible range of customer journeys. This helps ensure that standards are consistently applicable and capable of being monitored across the sector. Milestones that are highly project-specific may create complexity, unequal treatment between different customer groups, and difficulties in establishing standardised performance measures.
- 3.51 As an initial step we intend to keep the current structure of the GSoPs framework using the currently defined milestones, as listed in Appendix . However, we remain open to considering introducing additional milestones, including those proposed by stakeholders, where they can be applied consistently across all connections subject to GSoPs.
- 3.52 We nevertheless consider that greater weight should be placed on project delivery-related GSoP milestones, namely the commencement of works, completion of works and project energisation. These milestones represent the key points at which customers begin to realise the benefits of their connection and where delays are most likely to result in tangible costs and lost revenues. Focusing compensation on these stages therefore better aligns payments with customer detriment and strengthens incentives for timely delivery. Under this approach, the value of payments could increase proportionally to the length of the delay up to a maximum cap.

Expanding GSoPs to include TOs

- 3.53 While GSoPs provide an established mechanism for standardised compensation within distribution connections, based on our analysis, we consider that it is not currently practicable or possible to implement them at transmission level due to the more bespoke nature of large transmission projects, much longer delivery timescales, and the reliance through the connection journey on NESO processes. Planning processes and wider network works also play a significant role. Therefore, we are not going to pursue this further.

Further analysis and engagement

- 3.54 We will undertake further analysis and evidence gathering to determine the appropriate level of GSoP payments, and to ensure that they are set at a level that is fair, proportionate, and aligned with the objectives of the framework.

Transforming the Connections Experience: 2026 policy consultation

- 3.55 We will also work with stakeholders to determine the appropriate level at which to set other metrics, including the level at which any payment cap should be set.
- 3.56 We consider that strengthening the GSoPs framework and increasing payment values will act as a stronger deterrent against DNOs for delays, improve decision making, and hold DNOs to greater account for meeting agreed connection dates.

Introduction of Liquidated Damages at transmission level

3.57 We have considered the following aspects as part of our LDs analysis:

- the suitability of the current LD framework
- introducing a minimum LD value and/ or obligations relating to the communication of LD arrangements at transmission level
- extending the existing LD framework to apply to both transmission and distribution connections

Current LD framework

- 3.58 We note that LDs are not a new concept within transmission arrangements. The CUSC construction agreement provides for LD arrangements between NESO and the connecting customer, supported by corresponding arrangements between NESO and the relevant TO under Schedule 9 of the STC.²⁰
- 3.59 We understand that existing LD arrangements calculate values in relation only to connection charges and one-off costs borne by the developer and are subject to contractual limits / caps under some circumstances. The precise interaction between LD provisions and how responsibility for projects delays is assigned between parties requires further consideration.
- 3.60 Existing arrangements also seek to distinguish between delays within and outside a TO's control, link liability to clearly defined contractual milestones, and rely on independent dispute resolution where responsibility is contested.
- 3.61 The evidence we have seen indicates that LDs in connection agreements are predominantly set to £0.00 per day and are linked to the relatively small values of the connection/one-off costs, although we do not currently have comprehensive data on their prevalence or the reasons for individual values.
- 3.62 We are aware of examples of LDs being set at other, negotiated values. The process for this is unclear and likely differs case-by-case depending on bilateral negotiations between a customer and a TO. There is however evidence to suggest that some customers may not always be aware they can seek alternative values. We would like to understand this, and why LDs are generally set at £0.00, more

²⁰ [schedule-9-to-construction-terms-v12-01-september-2026_0.pdf](#)

Transforming the Connections Experience: 2026 policy consultation

clearly. Stakeholder responses currently point to a combination of factors, including the complexity of NESO/TO contractual arrangements, difficulties attributing responsibility for delays, concerns over financial risk and costs, and the absence of any standardised requirement to negotiate LD values above £0.00/day.

- 3.63 A £0.00 LD rate provides no financial compensation under the LD provision itself and therefore offers no meaningful financial recourse through that mechanism where connection delivery is delayed. As such, stakeholders have questioned whether current arrangements provide meaningful customer recourse in practice and whether their application is sufficiently consistent and transparent.

Set minimum LD value and communication obligations

- 3.64 We have considered whether greater-than-zero LDs for TOs could provide a more targeted and proportionate mechanism for establishing accountability for transmission delivery performance.

- 3.65 We see merit in the use of strengthened LDs in transmission connection agreements. LDs provide a pre-agreed contractual remedy where specified delivery commitments are not met. They can be calibrated by reference to anticipated customer impacts as a result of breach of contract. In this context, this would relate to missed connection dates arising from delays within the TO's control. LD values could be tailored to specific contractual arrangements and project characteristics.

- 3.66 We have considered two strengthened LD models:

- setting the minimum value to a value that is higher than £0.00 and using existing LDs principles, eg contractual milestones
- introducing a requirement for NESO and the relevant TO to ensure that customers receive clear and transparent information about available LD arrangements, and to ensure that the value and terms of any LD provision are considered before the construction agreement is entered into

- 3.67 There are a number of considerations in developing and strengthening current LDs:

- minimum payment value – calibration of the minimum LD value; options could include setting damages at a reasonable estimate of the impacts likely to arise from delay, fixed percentage of project value (for example, 0.5%), or as a defined percentage of the financial losses incurred for each day of delay attributable to the TO
- design considerations - the STC Schedule 9 framework ties LDs to clear contractual milestones and relies on independent dispute resolution

Transforming the Connections Experience: 2026 policy consultation

- separation of controllable and non-controllable delays - the STC already recognises the importance of distinguishing delays within a TO's control; we consider any future approach to LDs should retain this principle
- payment caps and liability limits - the STC also specifies financial caps for maximum LDs paid out to customers, which could constitute a useful framework for enhanced LDs provisions
- legal considerations - as the construction agreement is between NESO and the customer, NESO would have the direct contractual role in agreeing and administering customer-facing LD provisions, while corresponding arrangements between NESO and the relevant TO operate through the STC framework
- regulatory overlap and risk of double penalisation - there are other enforcement mechanisms for failures to deliver, and for ensuring delays in delivery are penalised, within other regulatory frameworks, eg price controls

3.68 In terms of precedent, we understand there are international examples of LDs being used in connection agreements which may provide useful reference points when considering the design of an enhanced LD framework, including (but not limited to):

- the Independent System Operator New England, which operates the electricity system across the New England region of the United States, where connection agreements include LD provisions for missed connection dates, with compensation set at around 0.5% of project value
- the North Rhine-Westphalia region in Germany, where LDs are used within connection agreements, and include both provisions for delays attributable to the network operator (one recent award was made of €140,000), as well as clear protections for network companies for delays outside their control.

3.69 We have also considered the risks associated with new LD options:

- non-connection-based costs, such as infrastructure build costs, are socialised across all energy consumers, so expanding the LDs framework to apply to these non-connection-based costs could increase costs for wider consumers if network companies seek to back off that risk
- if the LD framework created the potential for disproportionate damage awards, for example through a £ cap set too high, we would expect TOs would take steps to mitigate their increased financial exposure risks by raising costs for all customers, and mitigating the risk of incurring LDs by offering more conservative connection dates

Transforming the Connections Experience: 2026 policy consultation

- there is risk and complexity due to the interdependency of TOs and NESO, including the distinct customer management roles and responsibilities between them
- 3.70 Whilst we acknowledge the risks of introducing LDs, we have seen sufficient evidence of their feasibility to justify further exploration. We consider that some form of customer recourse in the event of connection delays is proportionate, and we believe that more can be done to improve TO performance and prevent delays from happening.
- 3.71 Furthermore, the use of LDs within connection agreements, alongside enhanced customer protections, could help attract further investment in connection projects by reducing risk and increasing certainty for investors.

Expanding LDs to apply to distribution

- 3.72 Due to the widespread stakeholder support for the further exploration of LDs within the TO contract, we investigated the feasibility of introducing them across all network operators. However, we will not expand LDs to DNOs as there is already a GSoPs framework in place that, as noted above, we intend to strengthen, and that we expect to achieve our intent of holding DNOs to greater account against meeting connection dates. We are therefore only exploring LDs at a transmission level, where there is already an established mechanism for them within existing construction agreements.

Further analysis and engagement

- 3.73 We are now seeking stakeholder views on whether greater-than-zero LDs should become a standard feature of transmission connection arrangements and, if so, what implementation model would be most proportionate and effective.
- 3.74 The options for strengthening the existing LD models described in paragraph 3.66 will be further refined through stakeholder and industry engagement, including workshops and webinars. These will remain subject to stakeholder challenge and refinement. Potential implementation routes could include enhancements to Schedule 9 through STC modifications, or alternative legal mechanisms for customer recourse. We intend to commence this engagement shortly after publication of this document.
- 3.75 LDs are also subject to further work on communication requirements, implementation route, value, and caps. Additional quantitative evidence will be needed to inform the methodology for setting LD values and caps. We intend to work with stakeholders to develop an approach that is fair, proportionate, and evidence based. To support this work, we may consider issuing a Request for Information (RFI) to gather further data on project values, losses, and the appropriate calibration of LDs.

Transforming the Connections Experience: 2026 policy consultation

- 3.76 Strengthened LD provisions could provide a more effective mechanism for driving accountability for transmission delivery performance and addressing the perceived imbalance of risk between customers and TOs. The purpose of this work is also to establish a stronger and more consistent form of recourse for transmission customers where delays are within a TO's control, while recognising the bespoke and interdependent nature of transmission projects.

Timely and Reliable Delivery Reporting

- 3.77 Both customers and network companies supported the need for greater transparency around delays throughout the entire connection journey. While customers may understand that some delays are unavoidable, respondents argued that there is currently insufficient transparency regarding the frequency, causes and duration of delays and the extent to which network companies meet their commitments.
- 3.78 We agree with the respondents' views and consider there is a need for greater transparency of this information to support accountability, as financial mechanisms alone do not provide customers with sufficient visibility of performance. Improved reporting and visibility of data can complement strengthened GSoPs, minimum service requirements set out in this document and wider ED3 reforms by creating greater transparency regarding delivery outcomes, which we believe acts as a powerful reputational incentive.
- 3.79 We also agree that greater delivery performance visibility could reinforce the outcomes sought through the 2.2 Ambitious Options for Customers (theme 5) proposals by making network company performance and customer outcomes more transparent.
- 3.80 However, we recognise concerns from network companies that simplistic league tables may create misleading comparisons and fail to reflect differences in project complexity, customer readiness, and wider dependencies. Any future reporting framework will therefore need to incorporate appropriate contextual information and avoid creating incentives for unintended behaviours. A simple best-to-worst league table could risk creating misleading comparisons. A network company should not be assessed in the same way for factors within its control and factors for which another party is responsible.
- 3.81 We are therefore considering a broader performance visibility framework, rather than a traditional league table. This could include a contextual scorecard, dashboard, or other form of comparative reporting.
- 3.82 New reporting requirements would focus on the performance of connection delivery activities. Our intention is not simply to publish headline performance statistics. Instead, reporting should provide meaningful information that allows customers to understand:

Transforming the Connections Experience: 2026 policy consultation

- how frequently connection milestones and connection dates are achieved
- the scale and duration of delays
- the causes of delays
- the extent to which delays arise from factors within or outside network company control
- the frequency and value of GSoP payments at distribution; and
- trends in delivery performance over time

3.83 To minimise additional regulatory burden, we will consider whether relevant information can be drawn from existing or planned reporting arrangements, including ED2, planned ED3 and RIIO-3 transmission performance measures, connections reporting and customer-experience information, rather than requiring a separate regulatory return.

3.84 We are minded to establish licence-based reporting requirements supported by guidance specifying core reporting methodologies and publication expectations. This would create a more consistent basis for performance comparison while retaining flexibility for future refinement.

3.85 We will work with industry, the TCD programme and the ED3 framework to develop a coordinated reporting approach. This will help avoid duplication and ensure that any reporting obligations focus on information that is most valuable to connection customers.

3.86 We will consider the following arrangements:

- the purpose and intended audience for public reporting
- standard definitions, measures, and reporting methodologies
- the treatment of project complexity, customer readiness, and external dependencies
- the approach to attributing outcomes between DNOs, TOs, NESO, customers and third parties
- whether information should be presented through contextual scorecards, dashboards, or other comparative reporting
- the reporting and publication frequency
- the relationship with GSoP reporting at distribution and wider transmission delivery reporting
- how existing and planned data collections can be used to minimise duplication and additional burden
- the balance between licence obligations, guidance and monitoring

Transforming the Connections Experience: 2026 policy consultation

3.87 These changes will be included in the statutory consultation process laid out in Quality and Reliability of Customer Service (themes 2, 4 and 5).

Decisions and Next Steps

DECISION 3.1 - Strengthened GSoPs

We will continue to develop:

- revised payment values for the existing standards - it is important that these reflect current market conditions and are sharp enough to deter delays
- the structure and value of tiered payments for delivery-related delays – it is important that these work together to ensure values are sharpest at the most critical stages in the journey where customer losses may be incurred
- the appropriate overall payment cap - it is important that DNOs are not disproportionately or unfairly impacted by GSoPs values
- whether standards and payments should continue to be differentiated by voltage or instead by capacity – it is important to reflect the reality of projects, their connection requirements and their impacts on the network
- whether any additional milestone-based GSoPs should be introduced and, if so, the milestones to which they should apply – again, it is important that the framework captures the most critical stages of the customer journey
- exemptions and delays arising from matters outside a DNO's control – it is important that DNOs are not held liable for delays unfairly or unjustifiably.

DECISION 3.2 - Liquidated Damages for transmission

We will continue to develop:

- the methodology for setting payment values and financial caps – it is important that these reflect current market conditions, are sharp enough to deter delays, and are fair to both the customers and TOs
- the circumstances in which a delay should be treated as attributable to a TO – it is important that TOs are not held liable for delays unfairly or unjustifiably
- the milestones against which LDs should apply – it is important that these milestones are fair and apply to as many projects as possible
- how responsibilities for their implementation should be allocated between NESO and TOs – it is important that these are allocated appropriately to ensure smooth process implementation
- requirements for explaining and discussing LDs with customers – it is important that customers can make informed decisions when negotiating LDs in contracts

Transforming the Connections Experience: 2026 policy consultation

- the interaction with existing contractual, dispute-resolution and price-control arrangements – it is important that TOs are not penalised multiple times through multiple regulatory mechanisms
- the appropriate implementation route, including whether changes should be made through the STC, strengthened Schedule 9 arrangements or another legal or regulatory mechanism – it is important that LDs are proportionate and practical to administer

DECISION 3.3 - Reporting and performance visibility

We will:

- develop a performance visibility framework to improve transparency and accountability across the connections process.
- assess whether the framework should include contextual scorecards, dashboards or other comparative performance measures
- design the reporting framework to complement and co-exist with wider delivery reporting arrangements.
- coordinate this work closely with the TCD programme, the [Quality and Reliability of Customer Service](#) (themes 2, 4 and 5), and relevant ED3 reforms to ensure a coherent overall framework
- collaborate with stakeholders to develop standardised performance metrics, reporting methodologies and proposals for publication requirements

Questions

Please provide evidence to support your view.

- Q3.1 Do you agree with the decisions we have set out for Timely and Reliable Connections (Decision 3.1 – Strengthened GSoPs, Decision 3.2 – Liquidated Damages for transmission, Decision 3.3 – Reporting and performance visibility)?
- Q3.2 Are there any additional considerations relevant to these areas (Decision 3.1 – Strengthened GSoPs, Decision 3.2 – Liquidated Damages for transmission, Decision 3.3 – Reporting and performance visibility) that we should take into account?

Transforming the Connections Experience: 2026 policy consultation

4. Standardisation of Network Dispute Processes and Guidance for Determinations (theme 7)

Section summary

This section outlines how network dispute processes will be standardised and enhanced to improve the customer experience.

Respondents expressed strong support for greater consistency, transparency and predictability across network dispute resolution processes, highlighting the need for clearer timelines, escalation pathways and evidence requirements. In response, we consider a common enhanced dispute resolution framework should be developed, while recognising the need for flexibility across different networks and dispute types.

Next steps include Electricity Networks Association (ENA)-led stakeholder workshops to develop an enhanced dispute resolution framework, and Ofgem undertaking a future review of our determination guidance to reflect changes arising from connections reform.

Problem statement (from original Nov 2024 consultation)

- 4.1 Network dispute processes are not applied consistently across transmission and distribution network companies.²¹ There is variation in timelines, escalation pathways, transparency requirements, and case management practices which creates uncertainty for customers. This also leads to inconsistent outcomes and reduces confidence in the effectiveness of dispute resolution arrangements.
- 4.2 The connection determination process, which is designed to resolve disputes arising within the connections process, can be confusing, lengthy, and requires significant engagement and resource commitment from all parties involved.

Goal

- 4.3 A network dispute resolution framework which provides greater consistency, transparency and predictability, and ensures that fair and proportionate mechanisms exist to resolve disputes efficiently. This will enhance customer experience and support investor confidence by providing assurance that disputes can be resolved through clear and effective mechanisms.

²¹ In what follows, when we refer to “dispute resolution processes” we mean the pre-determination processes in place at network companies and at NESO to resolve the issues that they are made aware of. When we refer to “determination process” we mean the process in place at Ofgem for resolution of any requests for determination formally made to us. Finally, when we refer to “current process”, we mean both the pre-determination dispute resolution processes and the determination process.

Transforming the Connections Experience: 2026 policy consultation

- 4.4 To provide clear and transparent guidance for all parties on the determination process, including the indicative forms of redress available to parties, and on Ofgem's role in managing complaints and issuing determinations.

Summary of stakeholder views

- 4.5 Respondents provided views in a freeform manner, and the views expressed presented some overlap between Q7.1 and Q7.2, so we have included the point in the section which is most relevant.

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

- 4.6 An overwhelming majority of respondents supported the standardisation of dispute resolution processes in principle.
- 4.7 However, some respondents questioned the proposed Energy Networks Association-led (ENA) approach. These respondents suggested that direct engagement between Ofgem and network companies may provide a more effective mechanism for developing and implementing changes. Some also raised concerns that ENA-led workshops may lack the governance and accountability arrangements needed to deliver meaningful improvements for customers.
- 4.8 Some respondents noted that other proposals across the end-to-end review, particularly those aimed at improving standards of service and the quality of connection offers, could reduce the number of disputes by providing customers with greater clarity, transparency and certainty throughout the connections process.
- 4.9 Conversely, some network respondents cautioned that an increase in principles-based licence conditions in other areas could lead to a higher volume of disputes and determination requests. They argued that as the connections landscape becomes increasingly complex, and network companies are required to comply with a broader range of regulatory obligations, principles-based requirements may create greater scope for differing interpretations of what constitutes compliance. This could increase the likelihood of disagreements between parties and result in more requests for Ofgem to determine disputes.

Process timelines

- 4.10 A significant majority of respondents, particularly developers, generators, investors and IDNOs, emphasised the need for clearer timelines throughout the dispute resolution process. Respondents consistently highlighted the absence of clear timelines within existing dispute resolution processes as a key weakness.
- 4.11 Many noted that disputes can remain unresolved for extended periods, with no clear expectations on response times, progression, or escalation. This was viewed as creating uncertainty for customers and undermining stakeholder/ investor confidence in the effectiveness of current arrangements.

Transforming the Connections Experience: 2026 policy consultation

Service Level Agreements (SLAs)

- 4.12 A suggestion supported by many respondents was the use of defined timescales for each internal dispute stage, supplemented with SLAs to increase confidence that these defined timescales are met. Multiple respondents have highlighted a lack of engagement from network companies as the reason for pre-emptive escalation to Ofgem; many respondents believed the introduction of SLAs could avoid this pre-emptive escalation.
- 4.13 It was noted by some respondents that any agreed, standardised and enhanced process must be followed by all participants including complainants, for example complainants should not escalate prematurely to senior management to try get a faster response and should instead let the agreed process run its course. It was considered that this would represent a change in behaviour and mindset for some complainants.

Dispute escalation and exhaustion

- 4.14 Many respondents consistently highlighted a lack of clarity and consistency around routes of escalation within existing dispute resolution processes, with escalation points seeming ad-hoc and inconsistent. Many noted that customers are often unclear about when and how to escalate issues, who the appropriate decision maker is at each stage, and when escalation to Ofgem is appropriate.
- 4.15 Several respondents noted that the nature of the dispute and customer type will impact the escalation routes available, but clear signposting of the escalation routes when initiating a dispute would reduce premature escalation to Ofgem.
- 4.16 Some respondents identified the issuing of a deadlock letter²² as an area of concern. Respondents noted that requirements to obtain a deadlock letter, or equivalent confirmation that internal dispute resolution has been exhausted, is entirely in the power of the disputed party.

Transparency

- 4.17 Several project developers and trade association respondents consistently highlighted transparency as a central weakness in the current dispute resolution and determination framework. Many noted that a lack of clarity around evidence requirements, process stages and outcomes contributes to delays and the need for repeated engagement.

²² A deadlock letter is a formal written statement from a company confirming that its internal complaints process is exhausted and no further resolution can be offered, allowing you to escalate to an external body.

Transforming the Connections Experience: 2026 policy consultation

- 4.18 A recurring topic was the need for clear and proportionate customer evidence requirements. Respondents reported uncertainty over what information is required at each stage of the process, leading to repeated requests for information, back-and-forth correspondence and inefficient use of resources for both customers and network companies.
- 4.19 Many respondents called for dispute resolution processes to be published, accessible and clearly signposted. Provision of the dispute process upfront to customers as part of connection offers or associated documentation was suggested.
- 4.20 Respondents highlighted the need for greater transparency through clearer, evidence-based explanations of decisions and outcomes, especially as the connection process becomes more complex (eg, Gate 2 criteria and milestone management). Several noted that providing a more granular rationale of decisions, especially connection costs, could reduce the likelihood of a formal dispute being raised. Improved transparency requirements for networks are being progressed under “Offer creation and provision” (theme 4) and “2.2 Ambitious Options for Customers (theme 5).

Scope of standardisation

- 4.21 Several network respondents supported standardisation between network companies in principle but emphasised the need for flexibility to reflect different network structures, dispute types and customer groups.
- 4.22 Some respondents considered reforms should focus on non-Energy Ombudsman (EO) escalation routes. The EO dispute resolution mechanism for domestic and small business customers was described as effective and efficient by several respondents. One respondent proposed an independent body, similar to the EO, to resolve connection disputes instead of Ofgem, removing Ofgem’s role as the final adjudicator.
- 4.23 Several respondents noted that differing contractual arrangements between transmission and distribution, including BEGA²³ and BELLA²⁴ agreements with NESO, may limit the extent of alignment achievable across differing regimes.

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

²³ BEGA refers to Bilateral Embedded Generation Agreements (BEGA) in which the contractual relationship is between generator and NESO.

²⁴ BELLA refers to Bilateral Embedded Licence Exemptible Large Power Station Agreement (BELLA) in which the contractual relationship exists between NESO and generator.

Transforming the Connections Experience: 2026 policy consultation

Determination Process

- 4.24 Some respondents highlighted the lack of clear timelines within the Ofgem determination process, noting limited visibility of timescales and that decisions can take several years to reach a conclusion, creating uncertainty for customers.

Role of Ofgem

- 4.25 Several respondents called for stronger Ofgem oversight of network behaviour and dispute resolution processes.
- 4.26 Respondents expressed concern that the absence of stronger oversight of network behaviour and of systemic issues across determinations may contribute to repeat disputes and poor customer experience. All respondents who mentioned the use of case management software to identify systemic issues were strongly supportive of this approach. They believe these insights should be shared with network companies to identify root causes and treat issues in a more preventive approach to dispute management.
- 4.27 Some network respondents considered that the review of the determination guidance should clarify Ofgem's role and the distinction between informal engagement, fact-finding and formal determinations.

Our response and analysis

- 4.28 Highlighting the broad support for standardisation in principle, we agree that a common enhanced dispute resolution framework should be agreed to improve the customer experience. We also note the extent and limitations that standardisation must consider in its practical implementation.
- 4.29 We continue to believe that the ENA is best placed to spearhead this work. The ENA-led workshops can provide an established forum through which network companies, developers, customers and other stakeholders can collaborate on the development of a common dispute resolution framework.
- 4.30 We consider that ENA-led workshops offer an effective mechanism for sharing good practice, identifying practical solutions and securing industry buy-in to reforms, while recognising the operational limitations and differences that exist across network companies dispute processes.
- 4.31 We agree that a full review of the guidance governing connections disputes is warranted, as the current guidance is outdated and does not adequately reflect the changes introduced through TMO4+ connections reform.

Current network dispute processes

- 4.32 Through dialogue with network companies in late 2025 and early 2026, we reviewed and mapped existing dispute resolution processes across TOs and DNOs. We found that all processes followed the same general pattern, with a dispute received, triaged, escalated internally to find a resolution, and, if

Transforming the Connections Experience: 2026 policy consultation

resolution is not possible, then external escalation (ie CUSC dispute or Ofgem referral).

4.33 However, this exercise highlighted inconsistencies, examples of good practice, and areas where greater consistency could improve customer experience.

4.34 Examples of fragmentation across existing network dispute resolution processes were identified in the following areas:

- Only one TO and no DNOs appeared to operate internal SLAs across the dispute lifecycle.
- Some DNOs publish customer-facing dispute resolution processes, although the level of detail varies. Most TOs also provided detailed internal procedures as part of the review, but these did not appear to be publicly available.
- Two DNOs referred only to escalation to the Energy Ombudsman, while three DNOs and one TO referred only to escalation to Ofgem. Clear escalation pathways for all customer types and dispute categories should be communicated from the outset of the dispute process.
- Only one TO and no DNO mentions what constitutes the exhaustion of dispute resolution process and the issuance of deadlock letters.

Principles for standardisation and enhancement

4.35 Drawing on stakeholder responses, our review of existing network dispute resolution processes, and initial engagement with the ENA and network companies, we have identified core principles to guide the development of enhanced dispute resolution guidance and improve customer experience.

4.36 The principles we consider are key for potential enhancement and standardisation include, with some areas of overlap with other proposals in the end-to-end review, are:

- defined timescales and SLAs for each stage of the dispute process, drawing on existing good practice identified in one TO process
- published internal and external escalation guides, identifying key contacts and escalation routes at each stage of the process to improve clarity and reduce delays
- clear criteria and timelines for the issuance of deadlock letters, including their role as evidence that internal dispute resolution processes have been exhausted prior to escalation
- structured escalation tiers, with clear responsibilities, decision-making authority and independent internal review mechanisms

Transforming the Connections Experience: 2026 policy consultation

- regular publication of anonymised dispute themes and root causes to improve transparency and support the identification of systemic issues, potentially through the Connections Annual Report (CAR)
- clear, evidence-based explanations of decisions, including more granular rationales where appropriate
- clear ownership of multi-party disputes, supported by designated case owners and defined information-sharing arrangements - this approach supports the broader transparency improvements being developed through the principle-based licence conditions proposed in section 2.1 Minimum Requirements Across the Connections Journey (themes 2 and 4)
- a detailed and transparent dispute resolution process published and made available to customers, including as part of connection offer documentation where appropriate
- enhanced case management practices, including dispute acknowledgement, case reference numbers, designated case owners, records of engagement and standardised communications
- criteria and process for the expedited handling of time-critical or strategically significant national infrastructure disputes

4.37 Overall, the recommendations set out above are not intended to capture every opportunity for improvement. Instead, they are designed to provide a foundation for further development and agreement through network-led, ENA-coordinated workshops involving a broad range of stakeholders.

4.38 The exact regulatory mechanism used to implement these requirements has not yet been determined. Potential implementation options could include network-led, ENA-coordinated guidance publication, supported by licence obligations requiring DNOs and TOs to have regard to that guidance.

Decisions

Update on past decisions

4.39 Since the publication of the last end-to-end review consultation in December 2025, there has been a varying degree of progress across several of the decisions and proposals in Theme 7. An update on the progress made against these decisions and proposals is set out below.

4.40 Proposal 7.1: We remain of the view that network led, ENA-coordinated workshops are the most effective mechanism for developing an enhanced and standardised dispute resolution framework.

4.41 Initial steps have been taken; however, progress remains at an early stage. There has been some progress by network companies and the ENA in the establishment

Transforming the Connections Experience: 2026 policy consultation

of workshops to aid in the preparation of the ENA-coordinated guidance on standardised network processes. Ofgem has engaged with the ENA and network companies to clarify rationale and scope for the proposal.

- 4.42 However, to ensure momentum is maintained, we expect the ENA and networks to set out a delivery timetable, including workshop timelines and target dates for the development and publication of guidance. This will provide stakeholders with greater certainty on how and when these reforms will be progressed.
- 4.43 We continue to consider that, in the interest of improved customer experience and to improve investor confidence in the dispute resolution process, it is right for networks with ENA support to drive this forward.
- 4.44 Decision 7.1: The first stage of the review of the Determination guidance has been completed - the supplementary guidance clarifying Ofgem's role with regards to the Gate 2 to Whole Queue (G2TWQ) disputes was published in December 2025.²⁵
- 4.45 Decision 7.2: A case management system and reporting functionality to identify trends across determination requests and complaints is in place, with reporting to senior leadership at regular intervals to identify and resolve any systematic trends.

New decisions

- 4.46 Based on stakeholder feedback, our engagement with the ENA and network companies, and the findings from our analysis, we have decided to take forward the following:

DECISION 4.1 - Provision of guidance for determinations

We will conduct a full review of the determination guidance to clarify prerequisites for a determination, determination scope, and take account of changing connections landscape since the last publication in 2017. We expect to conduct this review in 2027.

DECISION 4.2 - Enhancement and standardisation of network dispute processes

We have decided to take forward the enhancement and standardisation of network dispute processes. The ENA has agreed to establish a programme of industry workshops involving network companies, developers, trade associations, demand customers and other interested stakeholders, with Ofgem participating throughout the process. The standardisation and enhancement of network dispute processes will be centred around the identified principles set out in paragraph 4.36.

²⁵ [Supplemental Ofgem Guidance on the determination of disputes: Gate 2 to Whole Queue | Ofgem](#)

Transforming the Connections Experience: 2026 policy consultation

These industry workshops will be used to develop and refine a common framework for network dispute resolution, drawing on the principles identified through stakeholder responses and Ofgem's analysis.

We have agreed with the ENA that the output of these workshops will be two linked guidance documents. One a concise customer-facing version that leads, as well as a more comprehensive internal guide for network use, framed so the approach is transparent rather than appearing to hold process detail back from customers. Both can be published; the former is to avoid complaints processes looking overly complex for routine complaints.

The final framework and delivery mechanism will be informed by this engagement before being progressed to implementation.

Next Steps

- 4.47 The ENA should continue to coordinate with network companies and wider stakeholders to develop an initial common dispute resolution proposal that can inform the programme of industry workshops and subsequent guidance development.
- 4.48 The ENA and networks should set out a delivery plan setting out indicative timelines for stakeholder workshops, key milestones, and the development and publication of guidance. This will provide greater transparency on the expected scope, governance and delivery of the work programme.
- 4.49 The network-led, ENA-coordinated programme of industry workshops with wider stakeholders to develop a common dispute resolution framework. Following this engagement, the ENA should publish a proposed framework and implementation approach for stakeholder input before finalising the framework and delivery mechanism.
- 4.50 Ofgem will continue to engage closely with the ENA and networks throughout the process to monitor progress, provide input where appropriate, and ensure that the objectives of Theme 7 are reflected in the development of the framework.
- 4.51 Alongside this work, Ofgem will undertake a comprehensive review of its guidance on connection determinations during 2027. This review will take account of stakeholder feedback, developments arising from wider connections reform, and lessons learned from recent determination cases and requests. The review will consider areas including escalation triggers, evidential requirements, process transparency, indicative timelines and the scope of the determination process.
- 4.52 Any proposed changes to Ofgem's determination guidance will be subject to a separate consultation process before being finalised and implemented.

Transforming the Connections Experience: 2026 policy consultation**Questions**

Please provide evidence to support your views.

- Q4.1 Do you agree with the decisions we have set out for the Standardisation of Network Dispute Processes and Guidance for Determinations (Decisions 4.1 - Provision of guidance for determinations and Decision 4.2 - Enhancement and standardisation of network dispute processes)?
- Q4.2 Are there any other additional considerations relevant to this area (Decisions 4.1 - Provision of guidance for determinations and Decision 4.2 - Enhancement and standardisation of network dispute processes) that we should take into account?

Transforming the Connections Experience: 2026 policy consultation

Your response, data and confidentiality

How to respond

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

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

We will publish non-confidential responses on our website.

Your response, data, and confidentiality

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

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

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

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

General Feedback

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

Transforming the Connections Experience: 2026 policy consultation

- 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 connectionspolicy@ofgem.gov.uk

How to track the progress of a consultation

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

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

Transforming the Connections Experience: 2026 policy consultation

Appendix 1: GSoPs payment values

Current DNO GSoP values include:²⁶

- i. If the provision of a budget estimate deadline is missed singular fee of £85 is automatically provided to the connecting customer.
- ii. If the provision of a formal quotation deadline is missed a £35 - £265 daily fine is automatically provided to the connecting customer.
- iii. If an incorrect or incomplete quotation is issued, a singular payment of between £43 - £850 is provided. Furthermore, the connecting customer will be refunded if they have overpaid, or they must pay the difference if they have underpaid.
- iv. If the deadline for initial contact to schedule work, ie timeline applicable from quotation acceptance, is missed, a daily fine is automatically issued between £20 - £265.
- v. If the agreed commencement day is missed with no communication between DNO and customer, then there is an automatic daily £35 fine until work commences.
- vi. If the work is not completed by the quoted day, a daily fine of between £45 - £350 a day is applicable until work is complete.
- vii. Finally, if applicable, if work is not energised by the agreed date, there is a daily fine of between £180 - £350 to be paid until work is energised.

²⁶ [Adjustments to the Guaranteed Standards of Performance: 2026 | Ofgem](#)