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Ofgem
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By email only: Cap.Floor@ofgem.gov.uk

Re: Statutory Consultation on Proposed Modifications to Electricity Interconnector Standard Licence Conditions

Dear Ms Shaista,

Thank you for the opportunity to respond to Ofgem's statutory consultation, published on 23 April 2026, on proposed modifications to the Electricity Interconnector Standard Licence Conditions.

Question 1: Proposed Modification to Standard Licence Condition 26A – Pre-Operational Force Majeure

We support Ofgem's proposal to amend the definition of Pre-Operational Force Majeure as set out in Standard Licence Condition 26A.

Rationale for Support

We believe that the cap and floor regime plays a vital role in de-risking the significant capital investment required for electricity interconnector development in Great Britain. The pre-operational phase of interconnector projects is inherently exposed to a wide range of risks that are genuinely outside the reasonable control of licensees. It is important that the regulatory framework provides for these risks and does not specifically exclude the circumstance of performance or non-performance of a transmission licensee where such an event could impede the interconnector developers' ability to meet the Regime Start Date in an uncontrollable manner.

The change proposed provides interconnector licensees with appropriate certainty and clarity. In particular, we welcome the protection afforded to interconnector licensees already affected by and who could continue in the future to be affected by the performance or non-performance of electricity transmission licensees and equivalent entities.

Regardless of this change, NeuConnect continues to work closely with the connecting transmission licensee NGET on the GB connection works. We understand Ofgem are closely following the progress also.

Importance for Investor Confidence and Net Zero Delivery

Clear and fit-for-purpose force majeure provisions are an important element of the overall risk framework underpinning the cap and floor regime. Interconnector development involves long lead times, significant upfront expenditure, and cross-border regulatory complexity. Ensuring that licensees can rely on a clear and robust force majeure definition is important to maintaining investor confidence in the regime by ensuring the Regime Start Date is achievable.

Electricity interconnectors are a key enabler of Great Britain's energy security and clean energy transition. Ensuring that the regulatory framework remains appropriate and up to date supports the continued delivery of new interconnector capacity, which is essential for meeting the country's net zero ambitions and for managing energy price volatility.

Question 2: Proposed Modification to Standard Licence Condition 26B – Backstop Date

We have no comment to make on the proposed modification to the Backstop Date definition in Standard Licence Condition 26B as it applies exclusively to Window 3 interconnectors.

We would be happy to discuss any aspect of this response. Please do not hesitate to contact us.

Kind regards,



Andy Paton
COO, NeuConnect Britain Ltd