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**Project TransmiT: update on connections issues and consultation on
timely connections reporting obligation**

Dear Hannah,

Thank you for the opportunity to respond to this consultation.

Whilst we agree that there are benefits to reporting on timely connections, we have some practical concerns relating to the detail of the existing proposal.

Firstly, substantial information on connections is already provided to National Grid (as NETSO) by the TOs. This existing information includes more detail than that which is proposed in this licence modification and is presented in a clear and concise format. We believe that this report, collated by National Grid, already meets Ofgem's proposed requirements for connections reporting.

It seems more appropriate that National Grid provide this information as NETSO rather than the information being provided directly by TOs, as the NETSO has a more complete set of information regarding the "bigger picture". Furthermore, if the information is to be provided by TOs, we are concerned that it could lead to commercially sensitive information, relating to the connecting generators, being inadvertently made available to the public domain. We consider that, although the generators in question may be anonymous in the TO's report, it may not be difficult to deduce, given location and size, which generator the connection information refers to.

With regard to the proposed licence drafting, our concerns are as follows –

1. It does not appear to be practical to impose a 31st March reporting deadline for connections up to 31st March. Time is required to collate this data (especially given the timescale for connection offers) and it would be more appropriate and consistent to set a reporting deadline 3 months after the end of the preceding 6 month period. In other words, a report would be submitted on 30th June for connection offers between 1st October and 31st March.
2. Whilst the licence modification is proposed for condition D4A, most new connection offers are made under condition D16. We do not believe that the proposed drafting is clear in this regard.
3. Given the information already published by National Grid, we are unclear about what information Ofgem expect to be reported on in points 5(a), (b) and (c). We



believe that these points are very open to interpretation and the drafting is not yet clear.

In summary, we believe that the report produced by National Grid already provides extensive information on timely connections. However, if Ofgem believe that a licence modification is necessary, it would be useful if the proposed drafting provided more clarity on what additional information is expected.

If you would like to discuss this matter or require further information, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sam Ridsdale', with a long horizontal flourish extending to the right.

Sam Ridsdale
Regulation, Networks