



Email to: connections@ofgem.gov.uk
27/02/2026

Connections end-to-end review: updated proposals and next steps

Dear Ofgem,

About RenewableUK

RenewableUK members are building our future energy system, powered by clean electricity. We bring them together to deliver that future faster; a future which is better for industry, billpayers, and the environment. We support over 500 member companies to ensure increasing amounts of renewable electricity are deployed across the UK and access markets to export all over the world. Our members are business leaders, technology innovators, and expert thinkers from right across industry.

About Scottish Renewables

Scottish Renewables is the voice of Scotland's renewable energy industry. The sectors we represent deliver investment, jobs and social benefits and reduce the carbon emissions which cause climate change. Our 375-plus members work across all renewable energy technologies, in Scotland, the UK, Europe and around the world. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can help sustainably heat and power Scotland's homes and businesses.

Overview

RenewableUK and Scottish Renewables welcome Ofgem's intention to introduce a step change in their expectations of network companies in delivering grid connections. The End-to-End Review process is timely, given the severe current challenges our members are facing around grid connections and the Connections Reform process.

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In addition to our detailed answers to the proposals below, we would like to draw your attention to the **key areas** we think Ofgem should prioritise:

Role of the National Energy System Operator (NESO)

As mentioned in the document, we think Ofgem should be more explicit in recognising NESO's roles and responsibilities in the connections process. NESO plays a critical role in the connections landscape and Ofgem should clearly define its expectations for NESO regarding service standards, communication and the timely execution of their functions.

Implementation

Many of the proposals contained in the document will only come into force during the next price control period. Our members' experience of the connections regime to date, and the need to connect significant capacity during the current price control, dictates that these changes cannot wait. Ofgem should consider and set out the options it has for meaningful enforcement action against both the network companies and NESO within the current price control.

RenewableUK and Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely,

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Questions:

Theme 1: Improving visibility of connections data

1.1 Do you agree with Proposal 1.1. to introduce a new licence condition for accurate, complete and timely data?

We support the proposed new licence condition and the recommendation for the Transmission Owners (TOs) to conclude a data cleansing exercise by Spring 2026.

1.2. Do you agree with Proposal 1.2. to split data into open and sensitive categories, and to use the Data Sharing Infrastructure to share sensitive data?

We support the principle behind this proposal. Making as much data available as possible is essential for Ofgem’s single-view tool and for helping developers make informed decisions before applying. However, the proposal does not explain how Ofgem will stop NESO and the TOs from over-using the “sensitive” category. Clear guidance is needed on what counts as sensitive data and how it should be shared, so that maximum data can be released while still protecting genuinely sensitive information.

1.3. 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?

The importance of accurate data cannot be understated for our members. This includes not only connections data, but also timely sharing of data on the status of TO reinforcement works. We note that the Scottish TOs currently produce quarterly transmission Owner Reinforcement Instruction (TORI) reports on network reinforcements, which are welcome but could be improved by standardisation and sharing in a machine-readable format. Currently, NGET does not share any similar updates, leaving developers in England and Wales unaware of critical enabling works. Similarly, NESO data in the Transmission Works Register (TWR) and Transmission Entry Capacity (TEC) Register is often inaccurate and out of date.

Developers need to understand the progress of grid work to see how it will affect project development. Also, different information sources should be cross-compatible and include reference to existing project codes in the Network Options Assessment (NOA), Holistic Network Design (HND) and Accelerated Strategic Transmission Investment (ASTI) works.

RenewableUK and Scottish Renewables have been part of DESNZ convened workstream focused on improving data transparency in grid works and we encourage Ofgem to engage with this workstream and consider what regulatory measures they could take to encourage improved grid works information sharing.

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

2.1. 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?

RenewableUK and Scottish Renewables are strongly supportive of Ofgem's intention to introduce prescriptive licence conditions around milestones for network companies. This must be delivered alongside clearly demonstrated enforcement actions that will follow if milestones are not adhered to.

We support the milestones suggested in the document. Our members have also suggested that prescriptive milestones should be reflective of those placed on developers, e.g. securing land, planning and taking Final Investment Decision (FID). Further milestones that Ofgem should consider include:

- Timeframe to notify customers of changes to their programme of works
- Timeframe for commissioning programmes to be agreed
- Timeframe for the outage plan to be agreed

We also note that the delivery of grid connections does not only fall on the Transmission Owners. Ofgem should consider how milestones could also drive positive outcomes in terms of collaboration between the TOs, Distribution Network Operators (DNOs) and NESO, and clearly define roles and minimum outcome expectations.

Finally, our members report that communication at the post-offer stage is vital to them and they must be provided with regular opportunities to contact a Customer Manager who has knowledge and accountability for their connection. Ofgem should consider developing standards around the frequency and standard of these updates.

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

We support the development of principles-based conditions, but only in conjunction with the prescriptive conditions outlined above.

2.3. 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?

All of the above provisions must be considered in the context of the fact that the network companies must deliver exponential growth in customer connections over the next 10 years. This represents a huge step-change in comparison to what has previously been delivered. As such, new licence provisions must also be accompanied by a clear process to achieve this new level of delivery.

It is also important to note that industry confidence in the process is currently very low. While new provisions are welcome, this confidence can only be raised by consistent demonstration of competence by network companies and by clear, enforceable regulatory consequences for poor performance.

Theme 3: Requirements on networks to meet connection dates in connection agreements

3.1. Do you agree with Decision 3.1 to introduce a strengthened GSoP 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?

We support the decision.

3.2. Do you agree with Decision 3.2 to develop mechanisms to ensure GSoPs are accurately reported publicly?

We are supportive of this.

Currently, the TOs are required to produce a Timely Connections Report, which members do not think is fit for purpose, as it only assesses whether an offer was sent on time, not whether the offered date was different from or later than the developer requested. Reporting should reflect the delivery of dates against a reasonable expectation.

3.3. 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?

We support this proposal.

Members report that in current agreements, Liquidated Damages (LDs) are always set to zero and that the current contracts are weighted heavily in favour of the network company, providing little to no recourse for customers.

While we accept that any introduction of LDs must also balance the risk taken on by consumers, there is a need to rebalance the agreements to allow for fair risk sharing and ensure that parties meet their obligations. However, any penalty must have a material impact on the network company if it is to drive the desired behaviour changes.

Ultimately, grid delay risks are always borne by consumers; doing this via allocating the risk first to developers to price in, when those developers have higher cost capital and no ability to mitigate delays, rather than through Transmission Owners (TOs), is not to the consumer's best interest. Where delay risk is not mitigated, it is priced into CfD bids resulting in higher strike prices for the now 20-year CfD contract term. Risk should sit with the party best able to manage and mitigate it.

We also note that there is a risk that network companies could respond to the threat of LDs by becoming more conservative in their approach or look to cover this risk by increasing security payments or baking the cost into price control submissions. Therefore, any introduction of LDs should be accompanied by enforcement of ambitious connection dates as discussed in Theme 5.

3.4. 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?

RenewableUK and Scottish Renewables members have expressed serious and increasing concerns over the capability of network companies to deliver timely and ambitious connections. This is based on repeated experience of their failure to do so. As such, we strongly support any intention from Ofgem to increase accountability for network companies on connection delivery, either through an expanded Guaranteed Standards of Performance (GSoP) framework, liquidated damages, or a combination of both, provided this is also backed with clear intent to enforce.

Any enforcement action must result in a meaningful penalty if it is to achieve the desired change in network company behaviour. It is important that this penalty also flows directly to the affected generator. A penalty applied to a TO that does not translate into compensatory relief for the generator does not address the underlying commercial harm or reduce the financing risk. The objective should be to offset, at least in material part, the demonstrable losses arising from transmission delay. If the mechanism fails to compensate the generator, delay risk will remain priced into projects and ultimately passed through to consumers. Ensuring that financial accountability and compensation are aligned is critical to achieving the intended policy outcome.

Theme 4: Quality of connection offers and associated documentation

4.1. 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?

As part of decision 4.1, we are particularly interested in Ofgem ensuring that network companies provide accurate cost information and update customers on cost changes in a timely manner. RenewableUK and Scottish Renewables wrote to Ofgem on this matter in November 2025¹, we are keen to see Ofgem's response to the proposals in our letter.

Theme 5: Ambition of connection offers

5.1. 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?

We do not support this proposal.

Customers need certainty of connection dates, particularly in how they relate to other processes such as Contracts for Difference (CfD). In practice, developers would necessarily plan against the backstop (end) date, as there is no mechanism to ensure delivery by the earlier "ambitious" start date.

5.2. 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?

This proposal may have some merit in limited circumstances, however it must occur in a manner that gives the 'opting in' project adequate notice to meet the new date. We note that many projects, particularly larger ones, will not have the ability or interest to change from their contracted connection date.

5.3. 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?

Ofgem should further consider whether a prescriptive, rather than principles-based licence condition is appropriate for ambitious and achievable connection dates as this is less open to interpretation.

¹ https://www.renewableuk.com/media/cimpgiwg/letter-on-transmission-owner-costs-examples-and-recommendations-from-industry_renewableuk_scottish-renewables-21112025.pdf

Theme 7: Provisions and guidance for determinations

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

We agree with the proposal.

In particular, Ofgem should require parties to develop Service Level Agreements (SLAs) on dispute resolution. There is a role for NESO and the Electricity Networks Association (ENA) in promoting standardisation across networks.

7.2. 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?

RenewableUK and Scottish Renewables responded to Ofgem's recent consultation on Supplemental Guidance on the determination of disputes: Gate 2 to Whole Queue consultation². We retain the views held in this consultation response that Ofgem must take a more active and explicit role in dispute resolution.