Making a positive difference for energy consumers

Transforming the Connections Experience: Consultation Response Template

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Response deadline:	6 November 2026
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How to respond

You may respond to all questions or only those relevant to your organisation, expertise or interests. There is no requirement to answer every question.

For each question you choose to answer please provide an explanation of your views in the response field, including supporting evidence, examples or analysis where possible.

The response fields will expand as needed.

You may provide any comments that do not relate directly to a specific question in the **Other comments** section.

Please indicate in the **About you** section whether your response is confidential. Non-confidential responses will be published on our website.

Return your completed response template to connectionspolicy@ofgem.gov.uk by end of **6 November 2026**.

Contents

Transforming the Connections Experience: Consultation Response Template 1

How to respond 1

About you 3

Consultation Questions ..... Error! Bookmark not defined.

2.1 Minimum Requirements Across the Connections Journey..... Error! Bookmark not defined.

Question 2.1.1 ..... **Error! Bookmark not defined.**

Question 2.1.2 8

2.2 Ambitious Options for Customers ..... Error! Bookmark not defined.

Question 2.2.1 ..... **Error! Bookmark not defined.**

Question 2.2.2 11

3. Timely and Reliable Connections 13

Question 3.1 13

Question 3.2 ..... **Error! Bookmark not defined.**

4. Standardisation of Network Dispute Processes and Guidance for Determinations Error! Bookmark not defined.

Question 4.1 ..... **Error! Bookmark not defined.**

Question 4.2 ..... **Error! Bookmark not defined.**

Other comments 23

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Are you responding as an individual or on behalf of an organisation? (Select one).

☐ Individual ☒ Organisation

Is your response confidential? (Select one).

☐ Yes ☒ No

Which stakeholder category best describes your organisation?

☐ Transmission Owner

☐ Distribution Network Operator

☐ Independent Distribution Network Operator

☐ National Energy System Operator

☐ Developer

☐ Digital innovator

☒ Trade association

☐ Consumer representative

☐ Consultancy

☐ Other (please specify):

Click or tap here to enter text.

Consultation Questions

Questions are grouped and numbered by the chapters used in the TCE document. Each response box expands as you type.

2.1 Minimum Requirements Across the Connections Journey

Question 2.1.1

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

Decision 2.1.1 Pre-application

We welcome the introduction of minimum requirements for pre-application engagement and support Ofgem's objective of improving consistency and customer experience across network companies.

While fixed response times are an important step forward, our members' experience of pre-application engagement remains mixed, with the quality and usefulness of information varying considerably between network operators and projects. Customer outcomes will depend not only on timely engagement but also on the value of the information provided. We therefore consider that Ofgem's guidance should set out clear expectations regarding the minimum level of information and support that customers should receive during pre-application engagement.

Decision 2.1.2 Application

We support the introduction of standardised application requirements where these improve consistency and reduce delays across the connections process. Standardised application checklists should help customers understand the information better and support the submission of right-first-time applications.

However, care should be taken to ensure that information requirements remain proportionate and are limited to what is necessary to assess and progress applications. Standardisation should simplify the process rather than create additional administrative burdens for customers.

We also welcome the proposed requirement to ensure customers receive sufficient information and support throughout the application process, including assistance where further information is required. The proposal to provide customers with a named point of contact throughout the connections journey is particularly welcome and should help improve accountability, communication and issue resolution.

Decision 2.1.3 Offer Creation and Provision

We support the introduction of minimum information requirements within connection offers. In relation to Decision 2.1.3 C, a prescriptive licence condition would help provide customers with a clear and consistently applied standard.

In particular, we welcome the distinction between core information requirements applicable to all projects and additional requirements for larger, more complex or non-standard projects. Clear information on scope, connection dates, costs, exclusions, key assumptions, delivery milestones, dependencies and project risks should become standard practice. Offers should also explain the basis on which costs may change and provide appropriate safeguards against unjustified increases, supporting informed investment and development decisions. The level and detail of information provided should also be proportionate to the decisions customers are expected to make at different stages of the connections process. In particular, where information is intended to support gated progression decisions, customers should receive sufficient detail on costs, risks, dependencies and delivery assumptions to enable informed investment and project development decisions.

We also strongly support the proposed requirements relating to coordination, information sharing and issue resolution between NESO, Transmission Owners and Distribution Network Operators where multiple parties are involved in a connection. Our members frequently identify challenges in understanding ownership of issues, dependencies and delivery responsibilities where several organisations are involved. Greater transparency and coordination across parties should therefore improve customer experience and project delivery outcomes.

The requirement for information provided to customers to be understandable, transparent and factually correct is also welcome and reflects concerns raised by members regarding late, incomplete or inaccurate information.

Decision 2.1.4 Post-offer

We support the introduction of more clearly defined expectations regarding responses to post-offer queries.

Members frequently report lengthy delays in obtaining clarification on connection offers, with responses often taking several weeks or months. Time-bound requirements should help improve the customer experience, provided responses adequately address the substance of the query rather than acting solely as holding responses.

Customers may be unable to make an informed acceptance decision where material technical, commercial or contractual queries remain unanswered. We therefore encourage Ofgem to consider whether offer acceptance deadlines should be capable of being extended where network companies have not provided responses within the required timescales, ensuring customers are not disadvantaged by delays outside their control.

We also support proposals for a transparent change control process where material changes to offers or associated documentation are required.

Where connection agreements or associated contractual documents are amended, customers should be provided with clear visibility of the changes being made. This could include tracked-change versions of documents or comprehensive change schedules setting out amendments and their rationale. Members report undertaking time-consuming line-by-line reviews of revised agreements, including instances where provisions vary between otherwise similar projects without a clear explanation. Greater transparency and standardisation would improve efficiency and provide customers with greater confidence in the contractual process.

Members have also reported instances where material contractual provisions have been introduced or amended during the drafting process without the significance of those changes being clearly highlighted. Given the potential legal and commercial implications of such amendments, it is important that substantive changes are clearly identified and explained to customers.

Decision 2.1.5 Offer Acceptance

We support efforts to introduce clearer and more consistent acceptance procedures and communications. Providing customers with clear information on acceptance processes, key deadlines and lapse arrangements should reduce uncertainty and improve understanding of respective responsibilities following receipt of an offer.

Decision 2.1.6 Post-acceptance

We support the introduction of requirements relating to the communication of material changes, the management of change requests, responses to information requests and proactive customer updates.

For many customers, challenges emerge after an offer has been accepted rather than during the offer stage itself. Timely communication of material changes and regular project updates should help customers better manage delivery risks, understand project progression and make informed investment decisions throughout the delivery process.

Members have also highlighted significant delays in the processing of Modification Applications, Agreements to Vary and other contractual variations. These requests are often required to support progressing projects and investment decisions yet can appear to be deprioritised relative to activities that are subject to formal licence obligations. We therefore encourage Ofgem to consider whether service standards or indicative timescales should apply to the assessment and processing of post-acceptance modifications and variations, providing customers with greater certainty and supporting efficient project delivery.

Decision 2.1.7 Delivery Stage

We strongly support the introduction of minimum requirements during the delivery stage, particularly those relating to programme visibility, outage planning and customer access to delivery information.

Members continue to identify delivery uncertainty as one of the most significant challenges facing transmission-connected projects. Greater transparency regarding delivery programmer, dependencies, outages and emerging risks should improve customer confidence and support more effective project management by all parties.

This information is also likely to play an important role in supporting future customer protection measures, including any liquidated damages framework. Timely visibility of delivery risks, programme slippage and emerging issues will be essential both for mitigating delays where possible and for providing an appropriate evidential basis where delay attribution or compensation mechanisms need to be applied.

We consider this area particularly important given the concerns raised throughout the End-to-End Review regarding delivery certainty, accountability, customer protections and communication during project development and delivery.

Question 2.1.2

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

In addition to the measures proposed, we encourage Ofgem to consider mechanisms which provide greater visibility of project risks throughout the delivery phase.

One option would be for NESO, Transmission Owners and Distribution Network Operators to maintain and share project-specific risk registers with customers. These should identify key delivery risks, ownership of those risks, mitigation actions and any implications for programme delivery. Such an approach would support greater transparency and provide customers with a more complete understanding of their project's risk profile.

Supporting guidance should be written in clear, accessible language and presented in a format that enables customers to understand the requirements, responsibilities and processes that apply. We would also welcome NESO taking a more active role in managing the relationship between Transmission Owners and customers, helping to clarify responsibilities, coordinate engagement and resolve issues throughout the connections journey.

We encourage Ofgem to ensure that regulatory timescales and service standards explicitly cover NESO’s role, including comparable prescriptive milestones where appropriate. Where network companies depend on NESO to progress a milestone, an end-to-end approach would help clarify responsibilities and avoid gaps in customer service.

Feedback from a developer highlights difficulties accessing NESO customer contract managers and delays in receiving responses through the customer portal, in some cases extending to weeks or months. While direct engagement with Transmission Owners or Distribution Network Operators can help resolve queries, clear response milestones and service-level agreements for NESO's own responsibilities, including contractual changes and security queries, would provide greater certainty for customers.

A developer has also highlighted instances where a Transmission Owner reportedly answered a technical query within the five-working-day STCP timescale, but the response was not passed on by NESO until several weeks later. This illustrates the value of service standards covering the timely onward communication of information as well as its initial provision.

Alongside the focus on Transmission Owners and Distribution Network Operators, it is important to recognise NESO's role as the transmission customer's contractual counterparty. Feedback on Connections Reform communication and engagement points to opportunities for improvement. Clear expectations for timely communication, engagement and issue resolution would support a more consistent customer experience.

More broadly, our members continue to highlight that many of the issues identified through Themes 2-5 and 7 of the End-to-End Review relate to project delivery, transparency, accountability and customer protections. While we welcome the progress reflected in these proposals, we believe these areas would benefit from continued development and prioritisation given their importance to customer outcomes and successful delivery of connections.

In particular, members continue to emphasise the need for greater certainty around delivery timescales, clearer accountability where delays arise, improved quality and timeliness of information, and stronger visibility of project risks and dependencies throughout the connections process. The success of these reforms will ultimately depend on whether they deliver meaningful improvements in these areas for connection customers.

2.2 Ambitious Options for Customers

Question 2.2.1

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

Decision 2.2.1 Ambitious yet achievable connection offers definition

We support Ofgem's objective of ensuring customers receive realistic connection offers that maximise opportunities to connect at the earliest feasible opportunity.

However, members have raised concerns regarding how an obligation to provide "ambitious yet achievable" connection dates would be interpreted and enforced in practice. While the principle is reasonable, there is a risk that the concept becomes subjective without a clear definition of what constitutes both "ambitious" and "achievable".

Given the range of factors that can influence delivery timescales, including dependencies on third parties, outages, consents and wider network works, further clarity may be required regarding how compliance with this obligation would be assessed and evidenced. This will be important to ensure consistent application across licensees and to provide confidence to customers regarding what outcomes they should expect.

Decision 2.2.2 Energisation window

We agree with Ofgem's decision not to progress an energisation window as a separate regulatory mechanism.

Where target dates, delivery ranges or backstop dates provide useful information to customers, network companies should continue to be able to use these approaches. However, such arrangements should complement rather than replace a clear principal connection date and should not create unnecessary complexity or uncertainty for customers.

Decision 2.2.3 Opt-in mechanism

We support the proposal to develop a standardised, voluntary opt-in mechanism allowing customers to accept earlier or alternative connection opportunities where

these become available. Customers should be able to decline an alternative without detriment to their existing contractual terms or queue position.

Our members strongly support measures that enable viable projects to connect sooner and make more effective use of available network capacity. A well-designed opt-in mechanism has the potential to accelerate project delivery, increase flexibility within the connections process and help realise the benefits arising from wider Connections Reform initiatives.

The development of licence obligations and detailed guidance for the opt-in mechanism should prioritise clear governance, transparent criteria and proactive communication from NESO and Transmission Owners when delivery circumstances change. Earlier connection dates offered through the mechanism must be sufficiently firm to enable developers to re-sequence construction and commissioning with confidence.

We therefore encourage Ofgem to progress this work at the earliest opportunity.

Question 2.2.2

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

To support a consistent interpretation of an "ambitious yet achievable" offer, we encourage the development of a standardised methodology for determining Earliest in Service Dates. This could help mitigate the risk that strengthened Guaranteed Standards of Performance and liquidated damages incentivise network companies to make more conservative connection offers, while providing customers with greater confidence in the basis for proposed dates.

The proposed opt-in mechanism should be designed and implemented alongside wider Connections Reform arrangements to ensure customers can benefit fully from opportunities arising from queue optimisation and network reconfiguration.

Our members have highlighted circumstances where changes in network availability or queue positions create opportunities for earlier connections that may require an alternative Point of Connection. In these cases, customers should be able to access

those opportunities without facing unnecessary procedural barriers or being required to jeopardise their existing queue position.

Ofgem should therefore consider whether existing industry processes and guidance could unintentionally restrict the effectiveness of the proposed opt-in mechanism. Any conflicts between existing queue management arrangements and the objective of enabling customers to take advantage of earlier connection opportunities should be addressed as part of the detailed design process.

More broadly, the success of the mechanism will depend on customers receiving sufficient information to assess alternative opportunities, including implications for connection dates, costs, delivery risks and project requirements. Member feedback highlights the financing challenges posed by non-firm connections where access restrictions are undefined or cannot be quantified. Before accepting an alternative, customers should understand the level of enduring network access, any restrictions, the conditions and timing for achieving firm access, and any implications for charges or queue position. Opt-in opportunities should be transparent, accessible and straightforward to evaluate.

3. Timely and Reliable Connections

Question 3.1

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)?

We support the objectives of stronger performance standards, liquidated damages and transparent reporting. However, we consider that further detail and a clearer implementation timetable are needed to give customers confidence in how the proposals will operate. We would welcome continued engagement with Ofgem to develop proportionate, enforceable protections and a fair allocation of delay and cost risks.

Decision 3.1 Strengthened GSoPs

We support Ofgem's intention to strengthen Guaranteed Standards of Performance and improve accountability for delivery performance across the connections process.

We support materially higher distribution GSoP payments, calibrated to reflect the impact of delays and escalating as connection delays continue. This would strengthen incentives to meet agreed milestones and connection dates, while improving customer confidence that delays will be recognised and addressed.

We also welcome Ofgem's consideration of how the framework should apply across different project types. Any future arrangements should reflect the scale and impact of projects while ensuring customers are treated fairly and consistently.

Decision 3.2 Liquidated Damages for Transmission

We support meaningful, non-zero liquidated damages becoming standard in transmission connection agreements. Given the importance of certainty for developers, we encourage Ofgem to progress binding implementation as promptly as practicable, alongside clear arrangements for attributing responsibility and calculating payments.

Our members continue to highlight the significant impacts that transmission delays can have on project viability, investment decisions and delivery schedules. A well-designed liquidated damages framework could therefore provide a meaningful

incentive for timely delivery and help rebalance some of the impacts currently borne by customers when delays occur.

However, the effectiveness of any liquidated damages regime will depend on how it operates in practice. In particular, clear arrangements will be required to determine responsibility where delays occur, especially where delivery responsibilities are shared across multiple organisations. It will be important that accountability is attributed fairly, transparently and consistently.

We would welcome a clear, time-bound programme for resolving payment values, liability caps, delay attribution and implementation arrangements, informed by continued stakeholder engagement. The framework should support a fairer allocation of risk and provide customers with greater certainty as the detailed arrangements are developed.

Decision 3.3 Reporting and Performance Visibility

We support the development of a performance visibility framework and welcome proposals to improve transparency across the connections process.

Greater visibility of performance should help improve accountability, enable customers to better understand how organisations are performing and support continuous improvement across the sector. We particularly support the development of consistent performance metrics and reporting approaches which allow meaningful comparison and provide greater confidence in delivery performance.

Question 3.2

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?

Decision 3.2 Liquidated Damages for Transmission

Appropriate risk allocation should be a central consideration in the development of any liquidated damages framework.

Our members continue to experience circumstances where the impacts of delays are predominantly borne by developers, even where those delays arise from factors outside their control. Future arrangements should seek to ensure accountability is distributed appropriately across the parties responsible for delivery.

The design of liquidated damages should take account of the full range of financial costs incurred by developers as a result of grid delays, rather than focusing solely on lost revenue. Relevant costs may include contractor costs and the provision of alternative diesel generation where expected backfeed power is unavailable for wind turbine generator commissioning. This does not imply that all incurred costs must be reimbursed in full, but eligibility for liquidated damages and the methodology for payment values should not be based solely on lost revenue.

A developer has reported that Appendix K in its Construction Agreements sets liquidated damages at zero and has highlighted concerns about the wider allocation of contractual risks. This suggests value in reviewing how connection agreements balance the consequences of changes and delays between parties. Drawing on developers' experience of liquidated damages in supply-chain and contractor agreements could help inform proportionate provisions that improve certainty and accountability.

One developer has provided a live example of a project that achieved internal final investment decision in June 2025 on the basis of an October 2026 connection date towards which both the developer and Transmission Owner were working. The developer reports that, two months after that investment decision, it was notified of an 11-month connection delay and, at the same time, a cost increase of over 300%. It reports having to demobilise site operations, creating significant additional costs. While absolute certainty cannot always be guaranteed, changes of this scale shortly

after an investment decision can materially undermine project viability and investor confidence. For international developers allocating capital between markets, such experiences risk weakening confidence in the UK as a place to invest.

Delay attribution will also be critical to the success of any regime. Members frequently encounter situations where responsibility for delays is disputed between multiple parties, including Transmission Owners, NESO and contractors. Greater transparency regarding the causes of delays, combined with clear evidential requirements and appropriate audit mechanisms, could help build confidence that accountability is being assigned consistently and fairly.

Ofgem should also consider independent assessment mechanisms for complex cases where responsibility for delays is disputed between multiple parties. Members have raised concerns about the practicality of requiring the developer, Transmission Owner and NESO to agree on the same Independent Engineer to resolve delay-attribution disputes spanning the System Operator–Transmission Owner Code (STC) and the Connection and Use of System Code (CUSC). We therefore advocate assigning this responsibility to a consistent independent body, with clear arrangements for determining responsibility across the relevant agreements.

GSoPs and liquidated damages should address network-driven delays against the original agreed connection date, including delays to wider works on which connection depends, and recognise the direct harm experienced by customers.

We also encourage Ofgem to consider how compensation arrangements should apply where customers initially connect on a non-firm basis pending the completion of wider network reinforcements. In such cases, customers are often provided with a committed or communicated date by which firm access will be achieved. Where network-driven delays result in those reinforcement works being completed later than planned, customers may continue to face constraints, curtailment or other operational limitations despite having progressed their projects on the basis of the originally communicated timetable. Consideration should therefore be given to whether customer protections, including liquidated damages or equivalent compensation mechanisms, should apply where delays to network works postpone the delivery of firm access. Similar considerations may also be relevant for projects connecting under technical limits arrangements.

The framework should include clearly defined exclusions for delays outside the Transmission Owner's control and transparent arrangements for assessing responsibility. Care is also needed to avoid incentivising overly cautious connection dates, increased charges or the transfer of additional risks and costs onto customers.

Finally, while compensation mechanisms are important, preventative measures should also form part of the framework. Enhanced transparency, performance reporting and enforcement measures should help identify emerging delivery issues and encourage corrective action before delays occur.

We encourage Ofgem to adopt a phased approach to implementation, allowing measures that are ready to proceed while more complex methodologies are finalised, rather than deferring the whole package until April 2028. Ofgem should consider where prescriptive licence conditions would provide greater clarity and bring forward improvements as soon as practicable. This should include exploring an early route for customers affected by queue reordering to access liquidated damages through contractual variations, subject to an agreed methodology. Voluntary early adoption could offer useful benefits, but should complement a clear timetable for formal implementation rather than replace enforceable obligations. Published milestones and clear accountability across network parties would help customers and network companies plan with confidence.

Feedback from a developer has raised questions about the resources available to progress the remaining End-to-End Review themes. We would welcome reassurance that Ofgem has sufficient capacity to advance this work at pace, reflecting its importance to project delivery and wider energy objectives.

Decision 3.3 Reporting and Performance Visibility

Alongside delivery performance, greater attention should be given to cost certainty and cost transparency throughout the connections process.

Our members continue to report concerns regarding increasing project costs and cost uncertainty during the design and delivery phases of projects. While timetable performance is important, the overall customer experience is also heavily influenced by the accuracy of initial cost estimates and the management of cost changes throughout project delivery.

A developer reports being advised that initial Transmission Owner cost estimates carry a range of −50% to +100%, while subsequently experiencing increases beyond that range. Greater clarity about the reliability and purpose of estimate ranges would help developers assess financial exposure and plan investment.

Where Transmission Owners use such estimate ranges, we encourage Ofgem to explore whether a Guaranteed Standard of Performance could provide greater cost certainty. This could include consideration of the circumstances in which costs above the stated upper bound should be borne by the Transmission Owner rather than the developer, alongside transparent forecasts and timely explanations of changes.

We therefore encourage Ofgem to consider whether the performance visibility framework should include metrics relating to cost forecasting, quote accuracy, cost management and the communication of material cost changes. This would provide customers with greater transparency while incentivising effective project management and delivery performance.

4. Standardisation of Network Dispute Processes and Guidance for Determinations

Question 4.1

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)?

Question 4.1

We support the objectives of clearer determination guidance and more consistent network dispute processes. However, we would welcome further detail on Decisions 4.1 and 4.2 and opportunities to bring forward practical improvements. Clear service standards and adequately resourced routes to timely resolution would help ensure that the proposals meet customers' needs.

Decision 4.1 Provision of Guidance for Determinations

We support a full review of determination guidance to reflect changes across the connections landscape. Alongside this review, targeted improvements could help address more immediate concerns and provide customers with practical guidance and timely routes to resolution.

Clearer guidance on the scope of determinations, the circumstances in which they are appropriate, and the processes that apply should improve transparency and help customers better understand the options available where disputes arise.

Given the pace of wider Connections Reform and the importance of effective dispute resolution processes, we would encourage Ofgem to progress this work as quickly as practicable so that customers can benefit from any improvements at the earliest opportunity.

Decision 4.2 Enhancement and Standardisation of Network Dispute Processes

We support the objective of enhanced and standardised network dispute processes and would welcome further detail on their design and implementation timetable to give customers greater confidence in the arrangements.

More consistent and transparent dispute arrangements should help improve customer confidence in the connections process and provide greater clarity on how issues can be raised and resolved. We welcome the intention to develop these arrangements collaboratively with industry and believe this should help ensure that the resulting processes are practical and effective.

Question 4.2

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?

Decision 4.2 Enhancement and Standardisation of Network Dispute Processes

The success of standardised dispute processes will depend on ensuring that they are accessible, transparent, proportionate and capable of resolving issues efficiently. Clear deadlines, escalation routes and a designated coordinating owner for multi-party disputes would help customers navigate the process. Timely access to independent review is particularly important where investment decisions or delivery deadlines are at risk.

We welcome the proposed industry-led approach and support the ENA convening stakeholders to develop these arrangements. To ensure the best possible outcomes, it will be important that there is broad and balanced representation from network companies, generators, storage developers, demand customers, trade associations and other interested stakeholders throughout the process.

As the work progresses, Ofgem should also consider how dispute and determination processes interact with wider customer protections, accountability mechanisms and performance obligations. Customers should have access to clear and effective routes for resolution where concerns arise regarding delays, delivery performance, information quality or other aspects of the connections process.

Finally, any enhanced dispute process should seek to minimise complexity and avoid creating additional administrative burdens for customers, while providing confidence that issues will be considered fairly, consistently and within reasonable timescales.

Feedback from a de\veloper welcomes the “Supplemental Ofgem Guidance on the Determination of Disputes: Gate 2 to Whole Queue” and identifies opportunities for further practical improvements. We encourage Ofgem to consider these alongside the broader review, particularly where time-sensitive disputes would benefit from clearer procedures and workable remedies.

Feedback highlights concern about the remedies available if re-insertion into the connection queue ahead of the next evidence window is considered “unlikely” because of determination timescales. We would welcome clearer guidance on whether re-insertion is available and in what circumstances. Where it is not possible, an explanation of the alternative remedies would help customers understand potential outcomes.

Published service-level agreements and key performance indicators for Ofgem, Distribution Network Operators and NESO would help provide greater visibility of dispute-handling timescales. It is reasonable to expect customers to use available Alternative Dispute Resolution routes first, but these should work alongside CUSC processes without creating avoidable delays. Appropriate resourcing would support fair, accurate and timely outcomes.

Feedback from a developer highlights uncertainty about the next evidence window and the practical implications of a successful dispute outcome. The developer is concerned that waiting for a further window and subsequent Gate 2 offers could delay an offer by a whole calendar year, affecting surveys, planning consents, tenders and energisation. We encourage Ofgem to consider safeguards for projects with successful dispute outcomes at DNO, NESO or Ofgem level, including protection in future windows and a route to a Gate 2 offer. The treatment of such projects where zonal capacity caps would otherwise prevent an offer would benefit from explicit consideration.

Disputes may concern final queue ordering under CNDM as well as the validity of readiness evidence. Developers highlight the potential consequences for the Point of Connection, costs, curtailment and connection dates. Original contract dates used to determine ordering should be made visible, with sufficient supporting data and reasoning to enable customers to understand and scrutinise outcomes.

Transparency is particularly important when blending distribution and transmission queues where transmission access confirmation was delayed through the project progression process. NESO should also provide clear evidence and reasoning for its use of connection point and capacity reservation tools and zonal rebalancing, enabling customers to assess whether these have been applied fairly and to raise informed disputes where necessary.

Ofgem should revisit the Gate 2 to Whole Queue dispute guidance with these issues in mind, while recognising that Connections Reform is enduring. Effective dispute

arrangements must address future reform-related disputes, not only this one-off queue exercise.

Other comments

Do you have any further comments you would like us to consider?

Scottish Renewables and RenewableUK welcome the progress made through the Transforming the Connections Experience programme and support Ofgem's objective of improving the customer experience across the connections process.

We support the direction of travel towards improved transparency, information provision, customer protections and accountability across the connections journey. Our comments seek to strengthen these proposals through practical detail, proportionate obligations and a clear implementation timetable, developed in collaboration with Ofgem and industry.

However, members continue to highlight that many of the issues most critical to successful project delivery sit within the areas covered by Themes 2-5 and 7 of the End-to-End Review. While significant progress has been made in certain areas of Connections Reform, stakeholders remain concerned that issues relating to delivery certainty, accountability for delays, transparency, cost certainty, customer protections and risk allocation require continued focus and development.

These issues are particularly significant for transmission-connected customers, where delays, unclear accountability and increasing project costs can have material impacts on project viability, financing and investment decisions.

Alongside the progress on Theme 1, we encourage Ofgem to maintain momentum on the remaining themes and ensure that sufficient resources are available to support timely implementation. Clear service standards for NESO, a balanced allocation of delay and cost risks, and effective dispute remedies would help translate the programme’s objectives into tangible benefits for customers.

We note Ofgem’s proposal to work closely with stakeholders to refine implementation details so that changes can come into effect throughout 2027 and

at the start of the ED3 price control period in April 2028. While we recognise the need for appropriate development and consultation, we encourage Ofgem to front-load implementation of new requirements wherever reasonably practicable rather than aligning all measures with future price control milestones. Many of the challenges identified through the End-to-End Review are affecting customer experience, investment decisions and project delivery today. Industry cannot afford to wait for an extended period before seeing meaningful improvements in service quality, transparency, accountability and customer outcomes.

As implementation progresses, we encourage Ofgem to maintain a strong focus on ensuring that the proposed reforms deliver tangible improvements in customer outcomes. In particular, success should be measured not only by the introduction of new standards and requirements, but by demonstrable improvements in project delivery, information quality, customer confidence and accountability across the connections process.

Ultimately, the success of the Transforming the Connections Experience programme will depend on whether it delivers a more transparent, predictable and efficient route to connection that supports the timely deployment of renewable energy projects and wider net zero objectives.