Template for response to “Self-Build and Transfer” consultation

This template relates to the “Connect: Self-Build and Transfer” consultation and contains all of the consultation questions. We are seeking your views on our proposals to expand the scope of self-build and transfer for transmission-level assets. Your feedback will help inform our final decision. Please provide your contact details in the fields below and complete the respondent type section using the guidance provided.

We encourage you to respond to all questions where possible. For questions that ask whether you agree, disagree or neither agree nor disagree, please select the most appropriate option and explain the reasons for your view in the space provided. If you are unable to place a cross in the box, please highlight or underline your preferred response.

We may use artificial intelligence (AI) tools to support the analysis of consultation responses by identifying themes and patterns across large volumes of text. AI will not be used to make decisions. All outputs will be reviewed by officials before being used and personal data will be handled in line with our privacy notice and relevant data protection requirements.

If you would like all or part of your response to be treated as confidential, please clearly mark the relevant sections and explain why. Where possible, confidential material should be provided in a separate appendix. If you do not indicate that information is confidential, we will treat your response as non-confidential and may publish it. Standard confidentiality statements included in email signatures will not be treated as a request for confidentiality.

Respondent type: Industry Body / Trade Association

Company name and number (if applicable): Scottish Renewables/ RenewableUK

Contact email address: sboyle@scottishrenewables.com/ peter.mccrory@renewableuk.com

Confidential response: Yes ☐ No ☒

Respondent Type

The categories below help us understand the perspective from which respondents are submitting their responses.

Please select the category that best reflects your role in relation to this consultation. If more than one category applies, please select the category that best represents the primary perspective of your response.

If you do not select a respondent category or there has been an obvious error in selecting a category type, we will assign one based on the information provided in your response and, where relevant, publicly available information.

If none of the categories are suitable, please select **"Other"** and provide further details.

If you are responding as a **demand project developer**, whether as a standalone demand developer or as part of an integrated development, please indicate whether you are a **data centre developer** or a **non-data centre demand developer**. You may also provide further details about your development, if relevant (for example, hyperscaler).

- Advocacy Group
- Arm's Length Body
- Consultancy Service
- Demand Project Developer
- Devolved Government
- Distribution Network Operator (DNO) / independent Distribution Network Operator (iDNO)
- Financial Institution
- Generation-only developer
- Government Department
- **Industry Body / Trade Association**
- Integrated Generation/Demand Developer (a developer of both electricity generation projects and electricity demand projects)
- Investor
- Local/Mayoral Authorities
- Non-Governmental Organisation (NGO)
- Other
- Private Individual
- Research Organisation
- Supplier
- Technology Vendor
- Transmission Operator (TO)

Questions on self-build assets

1. Do you agree that our proposals will achieve what good looks like for self-build assets?

   Agree ☒ Neither agree nor disagree ☐ Disagree ☐

Scottish Renewables and RenewableUK broadly support the proposed expansion of self-build and transfer arrangements. Allowing connecting customers to self-build and transfer all sole-use assets has the potential to increase customer choice, improve delivery flexibility and introduce greater competitive pressure into the delivery of transmission connection assets. However, the extent to which these benefits are realised will depend on the effectiveness of the wider framework, including arrangements relating to adoption, project failure, defects, future network requirements and the treatment of assets that may transition from sole-use to shared-use over time. We agree that maintaining system reliability, safety and asset quality must remain central to the framework and support the proposed focus on ensuring that assets are designed and constructed to appropriate standards. However, the success of the framework will depend on the timely delivery of activities that remain under Transmission Owner (TO) control. Clear service standards and accountability mechanisms will be needed to ensure these activities do not become a source of delay. We also consider that further clarity is required on how existing projects can modify applications to pursue self-build arrangements.

2. If not, what changes should we make?

We broadly support the proposals but recommend: - Clear service level agreements and timelines for Transmission Owner activities that remain critical to delivery. - Guidance on how projects already progressing through the connections process can modify applications to pursue self-build and transfer arrangements. - Greater clarity regarding commissioning, energisation and final asset adoption processes. - We note that in Ireland, where self-build and transfer is commonly used, EirGrid publish a minimum list of deliverables. We recommend that a version of this approach be adopted in GB to ensure a common understanding of expectations for developers undertaking self-build, as well as to prevent unnecessarily expensive or over-engineered solutions. Our preference is for these specifications to be standardised across all network regions. - A commitment to review implementation of the framework after an initial period to assess uptake, delivery outcomes and whether the anticipated benefits are being realised. - Greater transparency regarding the methodology used to determine contestable and non-contestable costs, including the assumptions and scope underpinning Transmission Owner cost estimates. Customers should be able to understand and assess the cost implications of pursuing a self-build and transfer approach

3. Do you agree that a PASE Primary Option should not require Ofgem approval?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We agree that PASE Primary Options should not require project-specific Ofgem approval. Where a project uses an established and pre-approved solution, additional approval requirements could introduce unnecessary process and reduce some of the benefits that self-build is intended to deliver. However, this should be subject to appropriate assurance that each option remains suitable for the individual project and that the PASE process has been correctly applied.

We support a proportionate approach in which additional scrutiny is focused on variant or non-standard solutions. However, PASE Primary Options should be reviewed periodically to ensure they remain up to date and do not unintentionally restrict innovation.

4. Do you agree that the process set out in the PASE guidance provides an appropriate level of scrutiny? (This process will be used for assets classed as connection assets for charging purposes or for infrastructure assets where the total cost is under £40 million.)

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We broadly agree that the proposed process appears to provide an appropriate level of scrutiny for connection assets and for lower-value infrastructure projects.

We support a risk-based approach that applies greater scrutiny to projects that depart from established standards while allowing established solutions to progress efficiently. However, the effectiveness of the framework will depend on timely decision-making and clearly defined review timelines. Delays within approval processes could undermine some of the intended benefits of self-build and transfer.

We also recognise that cost alone may not always be a sufficient indicator of project risk. Factors such as project complexity, asset criticality, future network impacts and the extent to which a proposal departs from established standards may also be relevant considerations when determining the appropriate level of scrutiny.

5. Do you agree that five years is the right length of time for the defect notification period?

Agree ☐ Neither agree nor disagree ☒ Disagree ☐

We neither agree nor disagree with the proposed five-year defect notification period. While a five-year period appears to strike a reasonable and proportionate balance between protecting consumers and network operators and managing risk for developers, further evidence would be helpful to demonstrate that this is the most appropriate duration.

We recognise the benefits of a standardised approach in improving transparency and consistency across projects. However, there may be circumstances in which project-specific factors justify a bespoke arrangement, provided this remains proportionate and is agreed by the relevant parties.

We also encourage Ofgem to ensure that the interaction between the defect notification period and any ongoing liability arrangements is clearly defined and does not impose unnecessary or overlapping obligations on developers.

6. How do you think uninsurable defects arising after the defect notification period should be dealt with?

We do not support open-ended liability for developers beyond the agreed defect notification period.

The purpose of defining a defect notification period is to provide clarity and certainty regarding risk allocation between parties. Once that period has expired, liability should generally transfer to the asset owner, provided the asset has been delivered in accordance with the agreed standards and requirements.

If there are specific categories of uninsurable defects that Ofgem considers require alternative treatment, they should be clearly defined, supported by evidence and subject to further stakeholder engagement. Any approach should maintain an investable framework while ensuring appropriate protection for consumers and network operators.

We also encourage Ofgem to carefully consider responses from Transmission Owners and other stakeholders on this issue to ensure any final arrangements appropriately balance risk, accountability and deliverability across all parties involved in the delivery and operation of network assets.

Questions on risk allocation between the connecting customer and Transmission Owner

7. Do you agree with the proposed allocation of risk between the connecting customer and the Transmission Owner?

Agree ☐ Neither agree nor disagree ☒ Disagree ☐

Scottish Renewables and RenewableUK neither agree nor disagree with the proposed allocation of risk between the connecting customer and the Transmission Owner.

We broadly agree that risk should be allocated to the party best placed to manage and mitigate it. The proposed framework generally reflects this principle and appropriately recognises that customers opting to pursue self-build and transfer should bear the risks associated with delivery, construction costs, obtaining permissions and consents, and defects arising from their works. We also support the principle that wider consumers should not be exposed to additional costs resulting from a customer's decision to self-build and transfer.

However, we have concerns regarding the proposed treatment of projects where the bilateral connection agreement is terminated and the self-build assets are no longer required. As drafted, the framework appears to assume that the connecting customer would bear the loss of any expenditure incurred regardless of the circumstances leading to termination. We consider this position requires further consideration. In particular, risk allocation should take into account which party has initiated the termination and the reasons for doing so. It may not be appropriate for customers to bear the full financial consequences where termination

results from factors outside their control, including decisions or requirements arising elsewhere in the connections process.

Further clarity would also be beneficial regarding project failure, abandonment or insolvency scenarios, including the treatment of partially completed assets, project records, contractual arrangements and responsibility for completing outstanding works.

More broadly, it is important that risks remain aligned with responsibilities. Where connecting customers are dependent on Transmission Owner actions to progress projects, clear accountability and performance expectations should apply. Customers should not bear the consequences of delays caused by factors outside their control. Similarly, the definition of "unforeseen circumstances" should be sufficiently narrow and should not encompass issues that a Transmission Owner could reasonably have anticipated and managed through normal project planning and delivery processes.

8. If not, what changes should we make to better achieve the outcomes set out in what good looks like?

While we broadly support the proposed allocation of risk, Scottish Renewables and RenewableUK consider that several areas would benefit from further clarification:

- Clear service level agreements should be established for Transmission Owner activities that remain critical to project delivery.

- The circumstances under which asset adoption can be refused should be clearly defined and applied consistently across Transmission Owners. Adoption criteria should be transparent and should include consideration of safety, operability, maintainability, asset information requirements and compliance with agreed technical standards.

- Greater clarity should be provided on the treatment of delays resulting from Transmission Owner reviews, approvals, commissioning or energisation activities. There should be explicit incentives for NESO and the TOs to ensure that assets are energised quickly after transfer.

- Ofgem should ensure that risks associated with modifying existing applications to pursue self-build arrangements are clearly understood and appropriately allocated. Existing projects should have a clear route to pursue self-build arrangements without adversely affecting queue position, connection dates or existing contractual rights, where this is technically feasible.

These measures would help ensure that risks remain with the parties best placed to manage them while preserving confidence in the self-build framework.

9. Do you think the Transmission Owner should have the right to intervene after the Adoption Agreement has been entered into when there is another customer who could use the assets?

Agree ☐ Neither agree nor disagree ☒ Disagree ☐

We understand the rationale for providing Transmission Owners with flexibility where network circumstances change after an Adoption Agreement has been entered into. However, we also recognise that intervention rights could introduce uncertainty for developers who have

made investment decisions and committed resources on the basis of an agreed self-build arrangement.

We therefore agree with Ofgem's initial view that a broad intervention right does not appear necessary at present. The gated connections process and the proposed design framework should significantly reduce the likelihood of assets unexpectedly becoming shared-use during delivery.

We also recognise that circumstances may arise in which assets initially considered sole-use become relevant to wider network development or additional connections during project delivery. Greater clarity would be helpful regarding how such situations would be managed, including the treatment of associated costs, programme impacts and responsibilities.

If circumstances arise where intervention may be required, any such arrangements should be clearly defined, used only in exceptional circumstances and include transparent compensation mechanisms to ensure that connecting customers are not disadvantaged by changes outside their control.

This would help preserve investor confidence while providing sufficient flexibility to respond to genuinely unforeseen system needs.

Questions on cost

10. Do you agree that our proposals on cost achieve what good looks like?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

Scottish Renewables and RenewableUK broadly agree that the proposed approach aligns with the principle that consumers should not bear additional costs resulting from a connecting customer choosing to self-build and transfer assets. We also support the principle that any wider network-funded assets should be subject to appropriate scrutiny to ensure value for money.

The proposed distinction between connection assets and infrastructure assets appears proportionate and aligns with existing charging principles. The requirements for scrutiny of higher-value infrastructure assets also provide an important safeguard where costs may ultimately be borne by a wider group of network users.

However, the framework’s effectiveness will depend on transparent and timely processes, including efficient assessment and approval arrangements where Ofgem scrutiny is required.

11. If not, what changes should we make?

We broadly support the proposed approach. However, we recommend:

- An agreed scope of works between the TO and the customer, supported by transparent cost breakdowns for contestable and non-contestable activities.

- Clear guidance on the information requirements and timelines associated with cost assessments and approval processes.
- Ongoing monitoring of whether the framework is delivering the anticipated benefits of competition and value for money.
- Transparency regarding how asset values are determined and assessed, particularly where infrastructure assets are involved.
- Greater transparency regarding asset valuation methodologies, efficiency assessments and the treatment of Transmission Owner assurance, adoption and commissioning costs would also support confidence in the framework.

These measures would help provide confidence that the framework remains efficient, proportionate and delivers positive outcomes for consumers and customers.

12. Do you agree with our proposal for how the Transmission Owner should recover the amount they pay the connecting customer for the assets?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We broadly agree with the proposed approach. Recovering costs through existing mechanisms appears proportionate and should minimise unnecessary complexity while ensuring that costs are allocated consistently regardless of whether assets are delivered by the Transmission Owner or through self-build and transfer arrangements.

We also support the objective of avoiding double recovery and ensuring that funding arrangements remain aligned with the underlying charging framework.

13. If not, how do you think they should recover these costs? E.g. would a separate funding stream in the licence be more appropriate?

Not applicable. Scottish Renewables and RenewableUK broadly support the proposed approach.

At present, we do not consider that a separate funding stream is necessary. Existing mechanisms should be sufficient provided they operate transparently and continue to support efficient cost recovery.

14. Do you agree with our proposed approach to the connection ODI-F?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We agree that the ODI-F should apply only to activities that remain within the Transmission Owner's control.

The incentive framework should reflect the principle that organisations should be rewarded or penalised only for aspects of delivery for which they are responsible. Where a customer chooses to self-build and transfer assets, it would not be appropriate for the Transmission Owner to be exposed to delivery risks arising solely from the customer's activities.

At the same time, the framework should continue to incentivise the timely completion of all activities that remain the responsibility of the Transmission Owner, including reviews, approvals, commissioning support, energisation and asset adoption.

15. If not, what changes should we make?

We broadly support the proposed approach.

However, we consider that any exemptions from the ODI-F should be accompanied by clear expectations and performance monitoring for Transmission Owner activities that remain critical to project delivery. This will help ensure that incentives continue to promote timely delivery at every stage of the connection process.

16. Do you think our proposals on cost are flexible enough to work with any future changes to the charging regime?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We consider that the proposals appear sufficiently flexible to accommodate foreseeable changes to the charging framework.

The proposed approach focuses on overarching principles for cost allocation, value for money and consumer protection rather than relying on highly prescriptive charging arrangements. This should provide a degree of resilience to future charging reforms.

However, any significant future changes to transmission charging should take into account consequential impacts on self-build and transfer arrangements and be subject to stakeholder engagement where necessary.

17. If not, what changes should we make to our proposals on cost to make them more future proof?

We broadly support the proposed approach and do not consider significant changes are required at this stage.

As a general principle, future-proofing could be strengthened through periodic reviews of the framework to ensure that self-build and transfer arrangements continue to operate effectively alongside any wider reforms to connection charging, network cost recovery and competition arrangements.

Questions on detailed process

18. Do you agree with our proposals for what the connecting customer should be responsible for?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

Scottish Renewables and RenewableUK broadly agree with the proposed responsibilities of the connecting customer. Where a customer elects to pursue a self-build and transfer approach, it is appropriate that they are responsible for the design, consenting, construction and commissioning of the assets they are delivering. However, there must be a clear definition of where customer responsibility ends and Transmission Owner responsibility begins, including in relation to design assurance, outage planning, commissioning, energisation, asset adoption and ongoing operational requirements.

We also agree that the connecting customer should remain accountable for fulfilling the requirements of the Adoption Agreement, including remedying defects identified during the defect notification period.

The proposed allocation of responsibilities is broadly consistent with the principle that risks and responsibilities should sit with the party best placed to manage them.

19. Do you agree with our proposals for what the Transmission Owner should be responsible for?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We broadly agree with the proposed responsibilities for Transmission Owners.

In particular, we welcome the requirement for Transmission Owners to provide information supporting informed decision-making, determine contestability, provide high-level designs and cost estimates, undertake non-contestable activities and ultimately adopt the assets.

However, the framework's effectiveness will depend on how these responsibilities are discharged in practice. Many of the activities retained by Transmission Owners, including design approval, commissioning support, energisation and asset adoption, are critical to project delivery. We therefore consider that these responsibilities should be accompanied by clear service standards, delivery timelines and monitoring arrangements to ensure that self-build projects are not delayed by processes outside of a developer's control.

20. Do you agree with our proposals for what the independent third party should be responsible for?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We agree that an independent third party should be responsible for resolving disputes relating to contestability, design approval and asset adoption.

An independent dispute resolution mechanism should improve confidence in the process and reduce the risk of prolonged disputes that delay project delivery. We also support the principle that determinations made by the independent third party should be binding.

To support efficient dispute resolution, it will be important that the process is transparent, proportionate and subject to clear timelines.

It will also be important that any independent dispute resolution arrangements operate within a clearly defined governance framework, including appropriate requirements relating to competence, transparency and appeal mechanisms where necessary.

21. Should we have a list of pre-approved independent third parties? If so, who should be on that list?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We support the establishment of a list of pre-approved independent third parties.

A pre-approved panel would provide greater certainty for all parties and reduce delays in identifying and appointing a suitable dispute resolver once a dispute has arisen. It could also support consistency in decision-making across projects.

The panel should comprise organisations and individuals with relevant expertise in transmission engineering, network design, delivery, commercial arrangements and connections processes. Ofgem should consult stakeholders on the composition and governance of any such panel.

22. Do you agree with our proposals for what NESO should be responsible for?

Agree ☐ Neither agree nor disagree ☒ Disagree ☐

We broadly support the proposed responsibilities for NESO within the self-build and transfer framework, including providing guidance, facilitating information sharing and supporting monitoring and evaluation.

However, we consider that Ofgem should set out its expectations in greater detail to ensure these responsibilities are delivered consistently and effectively. In particular, further clarity would be helpful on how NESO's role will interact with wider connections processes, the timelines and service standards that should apply to key activities, and the approach to data collection and reporting.

We also encourage continued coordination between NESO, Transmission Owners and Ofgem to ensure customers can access consistent information and support through the process.

23. Do you agree with our proposals for what Ofgem should be responsible for?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We broadly agree with the proposed responsibilities for Ofgem.

In particular, we support Ofgem's role in establishing the overall framework, approving non-standard solutions where required, monitoring compliance and evaluating the effectiveness of the arrangements following implementation.

A clear regulatory oversight role is important to maintaining confidence in the framework and ensuring consistent application across Great Britain's transmission network.

24. If you disagree, what should connecting customers, Transmission Owners, independent third parties, NESO, Ofgem be responsible for?

We broadly agree with the proposed allocation of responsibilities.

However, we consider that Transmission Owners should also be explicitly accountable for meeting defined service standards across the activities they retain within the delivery process. Given the importance of these activities to project delivery, clear expectations and monitoring arrangements would support the successful implementation of self-build and transfer.

25. Do you agree that our proposals on process achieve what good looks like?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We broadly agree that the proposed process provides a clear and structured framework for self-build and transfer.

We particularly welcome the increased transparency requirements, the publication of technical standards, the establishment of a Standard Adoption Agreement and the creation of independent dispute resolution arrangements. Together, these measures should improve confidence in the process and help customers make informed decisions.

We also recognise that successful implementation will depend on clear alignment between the PASE process, connection agreements, adoption arrangements and wider network planning requirements, together with clearly defined responsibilities and escalation routes.

However, achieving the intended benefits will depend on efficient implementation. Clear timelines for key decisions and approvals, together with appropriate accountability for Transmission Owner activities, will be essential to ensuring that the process remains timely and effective.

26. If not, what changes should we make?

We broadly support the proposed process. However, several enhancements could strengthen the framework:

- A framework for early agreement of the scope of works, with a project-specific boundary between contestable and non-contestable activities contained within the Adoption Agreement.

- Introduce standardised minimum technical deliverables and common adoption standards, preferably across all network regions, to promote consistency, reduce project-specific uncertainty and avoid unnecessary over-engineering.

- Introduce clear service level agreements and timelines for Transmission Owner activities, including design approvals, reviews, commissioning support and asset adoption.

- Provide additional detail on commissioning, energisation and final handover requirements.

- Publish guidance on how existing projects can modify applications to pursue self-build and transfer arrangements, including the treatment of queue position, connection dates, existing contractual arrangements and any sunk costs.

- Establish a process for ongoing monitoring and periodic review of the framework to assess uptake, delivery outcomes and the customer experience.

These measures would help ensure the process remains transparent, predictable and capable of delivering the intended benefits of self-build and transfer.

Questions on potential benefits

27. Do you think the high, medium and low scenarios for the potential benefits are realistic?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

Scottish Renewables and RenewableUK consider that using low, medium and high scenarios is a reasonable approach, given the limited availability of data and the project-specific nature of transmission connections.

We agree that the potential benefits of self-build and transfer are likely to vary significantly depending on factors such as project location, network requirements, planning and consenting considerations, supply chain availability and the extent of any wider reinforcement works required.

However, we note that the extent of any time and cost savings will also depend on the efficiency of the activities retained by Transmission Owners. If these activities become the critical path, the benefits of self-build may be reduced.

We therefore support Ofgem's intention to monitor outcomes and refine its assumptions as more evidence becomes available.

28. If not, what changes should we make to these?

We broadly support the proposed approach.

As implementation progresses, we encourage Ofgem to test its scenarios against real-world project experience and incorporate evidence on:

- Transmission Owner review and approval timescales.
- Commissioning and energisation activities.
- Availability of suitably qualified transmission contractors.
- The extent to which projects are constrained by wider reinforcement works.
- Uptake across different customer types and technologies.

This will help ensure future assessments reflect the practical realities of project delivery.

29. What evidence can you provide us to help us do the assessment of the impacts?

Scottish Renewables and RenewableUK are trade associations and do not hold project-level commercial data across the market.

However, feedback from members broadly supports the view that providing a self-build and transfer option could increase delivery flexibility and introduce greater competitive pressure

into the market. Members also highlighted several factors that may affect the scale of benefits achieved in practice, including:

- Limited availability of specialist contractors capable of delivering transmission infrastructure.

- The importance of Transmission Owner responsiveness and timely approvals.

- The potential for commissioning and energisation activities to become project delivery bottlenecks

- Questions regarding whether the anticipated time savings are achievable for all project types, particularly where extensive approval or reinforcement requirements remain.

We encourage Ofgem to continue engaging with industry as implementation progresses and to collect data from early projects to strengthen the evidence base.

30. Is the proposed archetype approach fit for purpose?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We agree that an archetype-based approach is a sensible and proportionate methodology for assessing impacts across a diverse range of transmission connection projects.

Given the significant variation in project characteristics, locations, technologies and network requirements, archetypes should help to provide a more realistic assessment than a single set of assumptions applied across all projects.

We encourage Ofgem to ensure that archetypes capture a broad range of project circumstances, including projects requiring substantial reinforcement works, projects with limited reinforcement requirements, and projects of differing sizes and technologies. Consideration should also be given to factors such as contractor availability, planning and consenting requirements, and the role of Transmission Owner activities in determining overall delivery timescales.

Questions on risks

31. Have we identified the key risks?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

Scottish Renewables and RenewableUK agree that inefficient design and build, substandard assets, and increased costs to consumers are among the key risks associated with an expanded self-build and transfer framework.

These are appropriate areas of focus given the need to maintain network resilience, deliver long-term value for consumers, and ensure assets can be safely operated and maintained following adoption.

It is also important to recognise Transmission Owner concerns regarding safety, security of supply, future connections, changes to asset use, latent defects and abandoned or incomplete projects, particularly where minimum technical compliance may not fully support the asset's long-term operation and maintenance.

However, we also consider implementation and delivery risks that may affect the extent to which the anticipated benefits of self-build and transfer are realised in practice.

32. If not, what do you think the key risks are?

In addition to the risks identified by Ofgem, Scottish Renewables and RenewableUK consider the following risks should also be recognised:

- Delays associated with Transmission Owner activities, including design reviews, approvals, commissioning support, energisation and asset adoption.

- Poor management and coordination of the self-build and transfer process between the different parties involved.

- Limited availability of suitably qualified contractors capable of delivering transmission infrastructure, particularly overhead line projects.

- Uncertainty regarding commissioning and energisation requirements, which may become a significant delivery challenge even where construction progresses efficiently. These activities may represent a greater delivery risk than construction itself, as they ultimately determine when a connection can be used.

- A lack of clarity regarding how existing projects can modify applications to pursue self-build and transfer arrangements.

- Lower than anticipated uptake if developers consider the process overly complex, uncertain or administratively burdensome.

- Uncertainty regarding project failure, abandonment or insolvency, including arrangements for partially completed assets and transfer of project information.

- Uncertainty regarding how assets initially identified as sole use would be treated if they subsequently become relevant to wider network development or additional connections.

- Risks associated with future operation, maintenance and asset stewardship where adoption requirements are not clearly defined.

Recognising these risks will help ensure that implementation arrangements address both asset quality concerns and practical delivery considerations.

33. Do you agree that our proposals adequately mitigate the key risks?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We broadly agree that the package of measures proposed by Ofgem provides an important foundation for managing the principal risks associated with self-build and transfer.

However, further clarity would be beneficial in relation to project failure, asset adoption, defect management and changing network requirements to ensure the framework remains effective throughout the full asset lifecycle.

Requirements covering technical standards, design approval, adoption arrangements, defect liability, dispute resolution and regulatory oversight should help maintain appropriate asset quality and consumer protection.

However, many of the proposed mitigations rely on timely and effective engagement by Transmission Owners. The success of the framework will therefore depend not only on the rules themselves but also on ensuring that Transmission Owners fulfil their responsibilities efficiently and consistently.

34. If not, what further measures do you think are needed?

We broadly support the proposed mitigation measures, but consider the following enhancements would strengthen the framework:

- Standardised minimum technical deliverables.

- Clear service level agreements and performance expectations for Transmission Owner activities.

- Increased transparency on review, approval, commissioning and adoption timelines.

- Additional guidance on commissioning and energisation requirements.

- Further clarification regarding modification processes for projects already progressing through the connections queue.

- Post-implementation monitoring and periodic reviews to assess whether the framework is delivering the anticipated benefits and whether any unintended consequences are emerging. This should include the publication of TO performance data.

These measures would complement Ofgem's proposed safeguards and support effective implementation.

35. What evidence can you provide us to help us quantify the impact of these risks materialising?

We are unable to provide a consolidated dataset that quantifies these risks.

However, member feedback has highlighted several practical issues that may influence the likelihood and impact of identified risks:

- Concerns that time savings may be more limited where projects remain dependent on Transmission Owner approvals and wider network activities.

- Evidence that specialist contractor availability may constrain uptake of self-build, particularly for transmission overhead line projects.

- Feedback that commissioning and energisation can be among the most challenging stages of project delivery and may represent a greater risk than physical construction alone.

- Industry experience suggesting that uncertainty regarding responsibilities, processes and interfaces can affect project delivery timescales and overall confidence in new delivery models.

We encourage Ofgem to continue gathering evidence from early self-build and transfer projects and to use this information to refine future assessments of both benefits and risks.

Questions on how this supports delivery of our duties

36. Do you agree that the new scope of self-build and transfer will support the delivery of our duties?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

Scottish Renewables and RenewableUK broadly agree that the proposed expansion of self-build and transfer supports the delivery of Ofgem's statutory duties.

Providing connecting customers with greater choice over how transmission connection assets are delivered should help promote competition and innovation within the connections market. Where customers can realise efficiencies in delivery, planning, consenting or procurement, the framework may also contribute to lower costs and faster connection outcomes.

The proposals also have the potential to support wider decarbonisation and economic growth objectives by providing an additional route for generation, storage and demand projects to connect to the transmission system. Improved flexibility and greater customer choice may help accelerate the deployment of infrastructure required to support the energy transition.

Scottish Renewables and RenewableUK agree that these outcomes are consistent with Ofgem's duties relating to consumer interests, competition, net-zero and economic growth.

However, the scale of these benefits will depend on the practical implementation of the framework. Realising the anticipated advantages will require timely and effective engagement from Transmission Owners throughout the delivery process. Appropriate accountability and performance expectations will therefore be important to ensuring the framework delivers the outcomes envisaged by Ofgem.

37. If not, why not?

Not applicable. We broadly agree that the proposed expansion of self-build and transfer can support the delivery of Ofgem's statutory duties.

However, successful implementation will depend on ensuring that the framework operates efficiently in practice and that the activities retained by Transmission Owners do not impede the delivery of the anticipated competition, cost and connection-time benefits.

Questions on implementation

38. Do you agree that the proposed licence changes will give effect to the policy proposals we have outlined in this consultation?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

Scottish Renewables and RenewableUK broadly agree that the proposed licence changes appear capable of giving effect to the policy proposals outlined in this consultation.

We particularly welcome the proposed obligations for Transmission Owners to facilitate competition in connections, publish relevant information and develop a Standard Adoption

Agreement. These measures should improve transparency and support more informed decision making by connecting customers.

Successful implementation, however, will depend on how these obligations operate in practice. We therefore encourage Ofgem to ensure that Transmission Owner responsibilities are supported by clear performance expectations, particularly where customers remain dependent on Transmission Owner actions to progress self-build projects.

We recognise that stakeholders, including Transmission Owners, may hold differing views on aspects of the proposed licence drafting, including adoption arrangements, project-specific requirements, future network considerations and implementation timelines. Ofgem should carefully consider these views alongside wider stakeholder feedback as it develops the final framework.

39. If not, what changes do we need to make?

We broadly support the proposed approach.

However, consideration should be given to introducing clear service standards, timelines and monitoring arrangements for Transmission Owner activities associated with self-build and transfer, including design reviews, approvals, commissioning support and asset adoption.

This would provide greater confidence that the objectives of the proposed licence changes are delivered in practice.

40. Do you agree that the proposed changes to the CUSC will give effect to the policy proposals we have outlined in this consultation?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We broadly agree that the proposed CUSC changes appear capable of supporting delivery of the expanded self-build and transfer framework.

The proposed amendments appear consistent with the policy intent of increasing customer choice while maintaining appropriate governance, oversight and allocation of responsibilities.

We welcome the creation of a clearer route for self-build and transfer within the connections framework.

41. If not, what changes do we need to make?

We broadly support the proposed changes.

However, further clarity should be provided on how existing projects that are already progressing through the connections process can modify applications to pursue self-build and transfer arrangements.

Given the large volume of existing projects in the connections queue, this will be an important factor in successful implementation.

42. Do you agree that the proposed changes to the STC will give effect to the policy proposals we have outlined in this consultation?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We broadly agree that the proposed STC changes appear appropriate to support coordination between NESO and Transmission Owners under the expanded self-build and transfer framework.

Clear responsibilities and information-sharing arrangements between the parties will be important in ensuring the process operates efficiently and consistently.

43. If not, what changes do we need to make?

We broadly support the proposed approach and have no specific drafting changes to suggest at this stage.

As implementation progresses, Ofgem should continue to ensure that roles, responsibilities and information flows between NESO, Transmission Owners and connecting customers remain clear and aligned.

44. From reading the PASE guidance, do you understand how to do self-build and transfer?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We consider that the guidance provides a helpful overview of the process and PASE's role within the proposed framework.

The distinction between primary options and alternative solutions is generally clear, and the guidance provides a useful structure for understanding the approval process.

45. If not, what changes should we make to the PASE guidance?

While the guidance is broadly clear, we consider that additional practical guidance would be helpful regarding:

- Commissioning and energisation requirements.
- Roles and responsibilities during the later stages of project delivery.
- Typical review timelines and approval milestones.
- Examples illustrating how modifications or design changes would be managed during delivery.

These additions would provide greater certainty for customers considering the self-build option.

46. Would it be helpful to have diagrams to illustrate PASE compliant designs or is the guidance on this already clear?

Agree ☒ Neither agree nor disagree ☐ Disagree ☐

We consider diagrams illustrating PASE-compliant designs a helpful addition to the guidance.

Visual examples would improve accessibility, support consistent interpretation of the requirements and help customers understand the distinction between standard and non-standard solutions. They may also reduce the potential for misunderstandings during the design and approval stages

47. What, if any, changes do you think are needed to the Standard Adoption Agreement guidance to allow Transmission Owners to draft this agreement in accordance with the policy proposals outlined in this consultation?

We broadly support the proposed approach to a Standard Adoption Agreement.

To strengthen consistency and transparency, we recommend that the guidance clearly sets out:

- Transparency regarding the methodology used to determine costs associated with Transmission Owner retained activities, including clear information on any charges incurred through the adoption, commissioning and energisation process.

- Framework for early agreement of the scope of works, with a project-specific boundary between contestable and non-contestable activities and a clear understanding of the associated cost allocation methodology.

- Expected timelines for Transmission Owner reviews, approvals and responses, together with clear escalation arrangements where those timelines are not met.

- The information requirements associated with each stage of the process.

- Clear procedures for managing design changes during project delivery.

- Commissioning, energisation and asset adoption requirements.

- Escalation and dispute resolution processes.

- Arrangements for projects seeking to move to self-build and transfer through a modification of an existing connection application.

- Clear adoption criteria covering safety, operability, maintainability, asset information requirements and the information required to support long-term operation of adopted assets.

Providing greater clarity in these areas would increase confidence in the framework and help ensure consistent implementation across Transmission Owners.