Solar Energy UK

Consultation Response

End to End Review

February 2025

About us

Since 1978, Solar Energy UK has worked to promote the benefits of solar energy and to make its adoption easy and profitable for domestic and commercial users. A not-for- profit association, we are funded entirely by our membership, which includes installers, manufacturers, distributors, large-scale developers, investors, and law firms.

Our mission is to empower the UK solar transformation. We are catalysing our members to pave the way for 70GW of solar energy capacity by 2035. We represent solar heat, solar power and energy storage, with a proven track record of securing breakthroughs for all three.

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Introduction

Solar Energy UK appreciates the opportunity to contribute to Ofgem's End-to-End Review. It's encouraging to see that much of the feedback we've provided regarding DNO performance has been referenced within the consultation.

As Ofgem is well aware, the grid presents the greatest challenge in achieving the UK's Clean Power 2030 goals, making it vital that we have responsive and efficient DNOs to meet growing demand. Our members' experiences with DNOs have often been strained, and much of this feedback has been shared directly with Ofgem through the Networks Subgroup of the Solar Taskforce.

We are hopeful that the End-to-End Review will address many of these negative experiences and lead to improvements. Additionally, we urge Ofgem to hold DNOs accountable not only for the outcomes of the End-to-End Review but also for the commitments made through the Solar Taskforce. Some of these requests are referenced in our response below.

Theme 1 - Visibility and accuracy of connections data and network capacity

Question 1a. Do you agree with the issues we have set out under Theme 1 – Visibility and accuracy of connections data and network capacity? Are there any other issues under this theme that we should consider or be aware of?

We agree with the concerns raised about the current challenges facing the industry. Much of the focus has been on speculative applications, with developers often blamed for the bottlenecks in the queue. However, this issue is largely driven by the lack of reliable data that would enable informed decision-making, which in turn fuels speculation. Clear and transparent data would provide developers with clearer signals and significantly reduce administrative burdens across networks.

At present, there is no demand register for projects accepted prior to connection. It would be highly beneficial for developers to have a clearer understanding of available capacity from operators before submitting connection applications. This could help minimise speculative applications and improve process efficiency. Moreover, with the new NESO project designation reforms, transparent data becomes even more essential. Developers need the ability to assess their queue position, especially given the prescriptive nature of these reforms, which are now location-specific. To better understand queue formation across Great Britain, it will be crucial to integrate transmission and distribution data seamlessly. This would also ensure

NESO is held accountable and help avoid potential issues.

The inconsistent data formats between transmission and distribution networks create challenges when attempting to combine these datasets for analysis. This issue will become even more pressing with the connections reform and the Clean Power 2030 regional capacities. Additionally, the lack of cost-book or average cost data makes it difficult for developers to estimate connection costs before applying. While we understand that connection costs provided during the process are indicative and subject to reconciliation, we believe the ENA, on behalf of all networks, should produce a standard file of average costs for the industry to reference.

Another key concern is the availability of network capacity at a more granular level. There is a pressing need for data related to ANM and curtailment, as we currently lack clarity on the technical limits that may arise. While identifying areas subject to curtailment is relatively easy, understanding the scale of curtailment without a formal application remains a significant challenge. More detailed data would enable developers to make better-informed decisions.

We also believe there is a lack of a structured process for requesting new data from network companies. A more comprehensive approach should be adopted, ensuring that all network companies have either a plan to produce the requested data regularly or a rationale explaining why the data cannot be provided, along with the necessary changes required to make it available.

Finally, we must emphasise the importance of data accuracy, granularity, and timeliness. If the data is not trustworthy—meaning it is accurate, complete, and up-to-date—it will be of little use to stakeholders who rely on it for effective planning and decision-making.

Question 1b. Do you agree with proposal 1a (new regulatory requirement on single digital view tools)? Do you have any views on how this should be implemented?

We support the principle of a 'single digital view' of the system, provided it offers a comprehensive perspective that includes both distribution and transmission networks, as well as potentially independent distribution networks. A unified platform for managing network data would enhance consistency and ease of navigation across the industry. Ofgem's point about such a platform providing clearer insights into the interface between Transmission and Distribution is particularly important, given the growing reliance on DNOs to meet Clean Power 2030 goals. However, there is considerable uncertainty around how this will be addressed in the connections

reform, underscoring the need for clear oversight.

To ensure the platform's success, it must be managed by an entity with the authority and expertise to oversee such a vast system, with clear obligations placed on network owners. While the Energy Networks Association (ENA) could seem like a natural choice, we believe they may lack the necessary oversight to fully incorporate the broader industry's views. Instead, an independent organisation with experience managing industry-wide data—such as NESO or Elexon—would be better suited to manage the 'single digital view'. These entities could also leverage existing code frameworks to place obligations on network companies, ensuring accountability. Additionally, the 'single digital view' should reflect both the current and future network at fixed points in time, providing more valuable insights than static snapshots alone. We strongly advocate for Ofgem to oversee the regulation of this tool to ensure its proper implementation and accountability.

Question 1c. Do you agree with proposal 1b (new regulatory requirement on the creation of guidance / standards for data visualisation tools)? Do you have any views on how this should be implemented?

We agree with the need to create and maintain a common set of standards for connections data and the tools used to manage it. A key challenge that developers currently face is the inconsistency of data across different DNOs. Standardising data formats across all DNOs would greatly benefit both the industry and the DNOs themselves by improving clarity and efficiency.

While we support the idea of a new regulatory requirement for networks to create supporting guidance and standards for data visualisation tools, we believe this approach will only be effective if it is prescriptive about how and when these standards are developed, and if compliance is actively monitored. In practice, this requirement will be more likely to succeed if a single data-management entity, such as those mentioned in our response to question 1b, is tasked with overseeing its implementation. Ofgem should serve as a point of escalation if needed to ensure that networks meet the necessary standards. In the short term, we don't believe a single tool needs to be developed by networks or the industry. However, it is essential that all data is interoperable and consistent across networks, allowing for eventual integration into a unified tool as part of a longer-term goal.

Question 1d. Do you agree with proposal 1c (new regulatory requirement to provide connections data)? Do you have any views on how this should be implemented?

No comment

Question 1e. What are your views on the completeness and discoverability of connections data that would be useful to you? Are the existing resources clear and transparent?

Our members have found that data accessibility for distribution companies is generally good, but the completeness of that data is often lacking. For instance, the embedded capacity registers across the six DNOs contain over 685,000 data points, yet about 30% of the data—more than 205,000 data points—are either missing or not available. Furthermore, the data published by different distribution networks is highly varied and disparate. While the process improves once an ENA standard form is agreed upon, this process is slow, and the overall progress is hindered by the lack of standardisation.

In contrast, the situation with transmission data is somewhat different. The data is mostly complete but finding it can be challenging. Most of the common data can be accessed through the NESO's data portal, but due to the sheer volume of reports published by NESO, it can be difficult to locate specific data, especially for those unfamiliar with the content of every publication.

For both distribution and transmission, we also have concerns about the accuracy of the data and how it will be applied in industry processes. This is particularly important for the data used in the 'Gate 2 to Whole Queue' process. Poor or missing data could negatively impact projects, and the resulting information asymmetry between networks and developers will make it difficult for the industry to fully understand how the 'Gate 2 to Whole Queue' process is being applied. These issues must be addressed to ensure a more transparent and efficient approach to data management across the sector.

Question 1f. Is there additional connections data that would be of use but legal barriers prevent it from being published? If so, do you consider that there are solutions that would enable this data to be made available, for example by aggregating it to appropriate levels / anonymising it etc.

No comment

Question 1g. Is there anything else regarding Theme 1 – Visibility and accuracy of connections data and network capacity that you consider we have missed?

No comment

Theme 2 - Improved standards of service across the customer journey (not including "minor connections")

We strongly believe that Distribution Network Operators (DNOs) should take a more proactive approach in updating stakeholders regularly. Adopting practices such as the ESO's monthly Customer Connection Agora on a sector-wide scale would greatly benefit the industry. We recommend implementing monthly or quarterly webinars where stakeholders can receive consistent organisational updates, ensuring that everyone remains well-informed and engaged in the process.

There also needs to be a clear requirement for network companies to improve data quality. While defining SMART objectives for data quality may be challenging, establishing a defined process with service level agreements (SLAs) to update data when errors are identified, monitored by Ofgem, would be a step in the right direction. Though this may not yield immediate results, over time, it would lead to a more structured and reliable approach to managing data across networks.

Additionally, consideration must be given to how connections data interacts with the reformed connection process being developed by NESO. The introduction of a windowed application process means there will be significant bi-annual updates to data by both NESO and the DNOs. While this could improve the relevance of data, it may also influence developer behaviour, as they will need to balance using the latest data with allowing enough time to complete internal and DNO processes before meeting the application windows.

Furthermore, with the growing prevalence of hybrid solar projects that include battery storage, there is an increasing need to account for both generation and demand components when assessing the impact of these connections on the existing network. Currently, there are no equivalent registers for demand projects in the Embedded Capacity Registers (ECRs) for solar projects, which adds to the burden on DNOs' planning teams as developers are often required to submit connection applications to determine network capacity. We propose that DNOs, with support from the ENA and the industry, expand the ECRs to include demand project data. This expansion could be achieved by bringing forward a code modification under DCUSA governance, with backing from the ENA. Such a modification would improve transparency and facilitate better collaboration and planning between demand and generation projects across the distribution network.

Question 2a. Do you agree with the issues we have set out under Theme 2 – Improved standards of service across the customer journey (not including "minor

connections")? Are there any other issues under this theme that we should consider or be aware of?

We agree with the concerns raised regarding the transmission/distribution (T/D) interface and connections reform, particularly around the clock start and technical competency. One of the significant challenges developers face is the delay after a Project Progression application is submitted by the DNO. It can take several months before NESO considers or deems a project technically competent. During this time, transmission projects may be offered connections that effectively jump ahead of distribution projects, even if the latter have been in the queue longer. While the upcoming Connections Reform aims to address this issue by replacing the existing Statement of Works (SoW) and Project Progression processes, further work is needed to ensure that existing projects in the queue are managed and communicated properly under the new system. We believe Ofgem's end-to-end review should include recommendations on timely assessments and the clear communication of transmission impacts, associated works, and costs, with specific timelines for technical assessments by transmission networks and responses from NESO or DNOs.

Post-acceptance engagement from network companies remains a concern. Currently, it can take months to arrange a kick-off meeting, and emails often go unanswered or receive delayed responses.

Consistency between transmission and distribution networks is crucial, particularly in how Battery Energy Storage Systems (BESS) are treated. While NGESO has adopted a non-firm approach to BESS, acknowledging that they typically do not create adverse impacts during peak system demand or generation, DNOs have not followed suit. Since diversity factors differ at the GSP level compared to lower levels, it is important for both transmission and distribution to adopt consistent approaches to BESS. Network planning assumptions, such as those for BESS, P2, P28, P18, and other factors, also vary widely between companies and need to be harmonised. We recommend that network companies standardise and publish their modelling methodologies and that developers assist in these assessments by providing BESS profiles for non-firm connections.

Finally, conflicting incentives between Transmission Owners (TOs) and NESO often result in unclear boundaries of responsibility. Both parties have customer satisfaction incentives, which can lead TOs to bypass NESO in discussions, as developers typically prefer to engage with TOs. This misalignment creates confusion and inefficiencies in the connections process. Clearer communication and a more streamlined approach are needed to address these issues effectively.

Question 2b. Do you have any views on proposal 2a (general principles-based licence condition and supporting guidance around standards of service throughout the entire customer journey)? Do you have any views on how this could be implemented?

While the intention behind the proposal is commendable, we believe it is unlikely to drive significant improvements in customer service levels on its own. What would be more effective is additional guidance from the ENA or Ofgem outlining how procedures and processes should be carried out. This would help ensure greater consistency across DNOs, addressing the issues caused by the patchy application of the recent Technical Limits scheme, which highlighted the consequences of lacking proper guidance and standardised practices.

We also have concerns regarding Proposal 2a. While it could theoretically work, we believe there are significant challenges related to how its principles and guidance would be practically enforced. Keeping the license condition sufficiently generic and principle-based means that it would be difficult to prove and enforce compliance, especially when the guidance itself can be changed or updated. As a result, Proposal 2a provides too much leeway for networks to argue that they are meeting the license conditions to the satisfaction of connectees, despite potential dissatisfaction. This would likely require substantial time and effort from Ofgem to investigate and enforce. Therefore, we believe Proposal 2b is better suited to meeting the needs of connectees. However, we recognise that there may be situations where a combination of both prescriptive license conditions and a principle-based approach (i.e., both Proposal 2a and 2b) could be explored to strike a better balance between flexibility and enforcement.

Question 2c. Do you have any views on proposal 2b (new prescriptive condition(s) around standards of service)? Do you have any proposals for any specific areas of the connections customer journey that should be subject to such a requirement?

We agree with the proposal to introduce minimum standards or Service Level Agreements (SLAs) that target the delivery of specific products or services, as outlined above. There are clear areas where such standards could be effectively implemented. For instance, Project Progression applications should have a time limit of six months for DNO submission and 30 days for NESO clock start. Other key areas where SLAs could be applied include:

- Allocation of project teams within 1 month

- Communications surveys completed within 3 months
- Harmonics surveys or other electrical studies within 6 months
- Tower surveys and designs (noting that these are often dependent on external contractors)
- Production of requested data for calculating curtailment within 1 month
- Novation agreements or other basic legal agreements within 1 month
- DNO program provided to the customer within 2 months
- Time taken for legal agreements, such as leases and wayleaves (though this is challenging to put a specific time limit on, it is often a blocker)
- MPAN production within 2 months
- Connection Agreement issuing by DNO within 1 month

Question 2d. Do you consider that any of the existing standards of service requirements set out in the regulatory framework for provision of specific products /services should be revised or removed? Do you consider that there is any duplication or overlap of regulatory requirements across the regulatory framework that needs addressed?

There is considerable focus on the burden placed on networks due to the unprecedented volumes of applications. However, we believe that the new gated process introduced by connections reform should help ease this burden significantly. With the new process in place, we feel that delivering minimum Service Level Agreements (SLAs) should be achievable for the networks, especially as the structure of connections reform is designed to streamline and better manage applications. It is crucial that the networks fulfil their regulatory obligations to ensure progress is not hindered further.

Although we have not conducted a detailed analysis of the individual service standards and license conditions across regulated networks, we believe it would be prudent to review all existing standards of service. This review should ensure that they align with the broader changes occurring within the connections process and with the proposals in 2a/2b. In general, we support the idea of network companies taking longer with connection applications, especially those subject to the Transmission Impact Assessment process, provided that the outcome results in

better quality and more effective delivery of services.

Question 2e. Is there anything else regarding Theme 2 – Improved standards of service across the customer journey (not including "minor connections") that you consider we have missed?

Communication from Distribution Network Operators (DNOs) is often a significant challenge, and improvements in this area would greatly enhance the process. Basic requirements such as replying to emails within 10 days, providing organisational charts so stakeholders know who to contact, and including mandatory phone numbers in email signatures would be extremely useful. These simple steps could go a long way in improving transparency and communication between DNOs and developers, helping to streamline interactions and avoid delays.

As mentioned in responses to earlier questions, there is a clear need to improve consistency between network companies. It is unclear whether the current comparative competition between networks benefits consumers, especially when it leads to inconsistencies in service delivery. Developers typically don't choose a network based on the quality of service provided; instead, factors such as land availability, resource access, connection dates, and local knowledge are more important when defining a project. Given this, there is a strong case for introducing license conditions that ensure greater consistency in the services provided by DNOs. These conditions should focus on standardising service levels across networks, allowing them to be compared based on their ability to deliver a consistent and reliable service to developers.

Theme 3 - Requirement on networks to meet connection dates in connection agreements

Question 3a. Do you agree with the issues we have set out under Theme 3 - Requirement on networks to meet connection dates in connection agreements? Are there any other issues under this theme that we should consider or be aware of?

We agree that meeting project milestones is crucial for the success of Connections Reform. This is especially important given the significant responsibility DNOs have in delivering the clean power targets for 2030, particularly for solar, where most connections are expected to be made at the distribution level. However, we are concerned that many delays will be caused by inadequate resourcing.

The issues identified with DNOs are also relevant for Transmission Owners, especially

in the context of localised works. While major reinforcement works on the transmission system require more coordination and present greater challenges, the same issues regarding delays and resourcing apply across both transmission and distribution. Currently, NESO has minimal influence over the delivery of reinforcement works by either DNOs or TOs, except in outage planning, which means they lack an overall incentive to ensure that works are delivered on time and within budget.

Given the proposed changes to introduce more competition in the delivery of transmission works, it is crucial that if developers are required to procure transmission network build via NESO, NESO must be held accountable for the delivery of their contractors—namely the Transmission Owners. Ofgem must carefully consider who should be regulated in this scenario, whether it should be the Transmission Owners themselves or NESO, to ensure that there is proper accountability in the delivery of transmission works. This accountability is essential for maintaining project timelines and ensuring the success of Connections Reform.

Question 3b. Do you have any views on proposal 3a (strengthened principles-based licence condition around meeting connections dates)? Do you have any views on specific wording that would achieve the intended outcome?

We believe the wording around "best endeavours" needs to be strengthened, as it leaves too much room for interpretation. A clearer commitment to transparency and accountability, particularly in relation to NESO designation, is essential. As noted in our response to question 2b, while we agree that a principle-based license condition could theoretically work, we see challenges in its practical application without more detailed descriptions of what the principles entail. For instance, when network companies are required to demonstrate “best endeavours” to meet a connection date, it is unclear what actions they must take to meet this standard, or how Ofgem would enforce the license condition if a network company provides alternative evidence.

We believe that a more effective approach would be to combine proposals 3b and 3a. By implementing SMART Service Level Agreements (SLAs) that are carefully designed, we can create a system where meeting connection dates has real consequences for network companies, both positive and negative. This could include rewards for meeting targets or penalties for failing to do so, thus providing a more tangible incentive for networks to prioritise and meet connection deadlines. This combination of clear expectations and enforceable consequences will be more effective in driving behavioural change and ensuring accountability in the delivery of connections.

Question 3c. Do you have any views on proposal 3b (minimum standards / SLAs around meeting connections dates)? Do you have any views on specific standards that could be introduced and how they would work in practice?

Connection dates provided in offers are often unrealistic, leading to significant discrepancies between expectations and reality. For example, many offers state that EHV connections at the DNO level will take around 2 years, but in practice, it typically takes 3-5 years for 33 kV connections, and 5-7 years for 132 kV connections, to complete the development, design, procurement, and construction phases. Transmission projects, in contrast, usually take between 10-15 years. Given these timelines, there needs to be more realistic and transparent discussions between developers and DNOs regarding what is achievable at each stage of the process, as well as an understanding of the dependencies that trigger each next phase. Specific activities should be assigned time limits to keep projects on track and provide clearer expectations.

We believe that this approach—coupled with realistic expectations—will be far more effective in incentivising networks. The standards and SLAs should strike a balance between providing networks with enough flexibility to deliver connections while also offering incentives (both positive and negative) to ensure works are completed efficiently. At the same time, developers should have some influence over how their projects progress. One potential idea for improving this system is to measure the difference between contracted and actual delivery dates against the developer's chosen connection date. This would help avoid network companies manipulating the metrics by offering pre-delayed connection dates.

Additionally, we propose implementing differing standards that assess network performance at both the individual project level (potentially linked to a financial instrument as outlined in proposal 3c) and across all projects delivered in a given year (possibly tied to broader price control incentives). Another useful metric could involve tracking the number of changes to the connection date made without the developer's consent, as well as the number of MW/days affected by these changes. Furthermore, metrics should vary based on the reason for delays, distinguishing between factors beyond the network's control (such as planning consent delays) and those within their control (such as slow procurement). This would provide a more nuanced view of network performance and improve accountability across the board.

Question 3d. Do you have any views on proposal 3c (a financial instrument

designed to offer recourse to connecting customers who face detriment due to delays)? Do you have any views on how this should be implemented?

The financial instrument does seem to work for the 90 day application process. However, the ethics of overworking scantly resourced primary system planning departments must be considered. There must be adequate resource to do the job in the first place.

We are supportive of introducing a financial instrument as it would compensate the affected party because of delays by network companies. We believe this financial instrument should.

1. Be applicable to all projects, regardless of size, technology or 'demand/generation' classification.
2. Be paid for by the applicable network triggering the delay – i.e. all projects subject to a Transmission Impact Assessment receiving this instrument from the NESO for transmission delays and all projects connected to the distribution network should be applicable to receive this instrument from the DNO for distribution delays. This payment will be determined by who is the delaying party (transmission or distribution). We note that depending on CMP328's progression, there may also need to be a method of transmission parties being compensated for DNO delays.
3. Be reflective of the scale of delay in terms of MWs delayed and length of delay.
4. Be mostly paid for by networks and automatically not socialised to consumers via Use of System charges, a price control mechanism or via an alternative mechanism such as liquidated damages, application fees etc.
5. However, we do believe there needs to be a sufficiently large cap/floor and pain/gain mechanism to manage providing networks with a sufficiently strong incentive without truly unlimited risk. We also believe that this may be asymmetric in distribution between paid/gain.
6. Some reasons for delay which are beyond the network's control (e.g. planning permission) should attract a lower rate compared to reasons which are in the networks control. This is to ensure there remains an incentive for networks to

continually deliver works quickly rather than 'sitting back' once the process is out of their direct control.

To manage this, we believe there should be methodology document created with the support of a license condition. This methodology would need to be subject to open governance so that neither networks nor developers were able to change this methodology without Ofgem approval. The methodology would also need to link to a mechanism in the price control; we believe industry would be willing to support the design of this mechanism in a way which protects consumers and provides suitable balance of risk/reward for networks.

Question 3e. Is there anything else regarding Theme 3 - Requirement on networks to meet connection dates in connection agreements that you consider we have missed?

As mentioned in our response to question 3d, if a financial instrument is introduced, we think it's important to review the interactions between liquidated damages and the financial instrument to ensure there are no conflicts or overlaps.

Theme 4 - Quality of connection offers and associated documentation

Question 4a. Do you agree with the issues we have set out under Theme 4 - Quality of connection offers and associated documentation? Are there any other issues under this theme that we should consider or be aware of? Proposals:

We fully agree with the issues raised under Theme 4 and would like to add the following points:

Firstly, there is a fundamental misalignment in contracting options between distribution and transmission that does not carry over across the T/D boundary. As a result, DNOs often make commercial decisions on transmission works on behalf of developers, particularly concerning the timing and payment of transmission works. These decisions are typically presented as non-negotiable, leaving developers with little to no influence over these commercial aspects, despite the fact that DNOs carry no financial risk for the transmission works due to User Commitment. We believe it is inappropriate for DNOs to make these commercial decisions on behalf of developers. Instead, they should be facilitating the passing through of costs, risks, and decisions between NESO and the developers.

Secondly, delays and uncertainties caused by the regulatory regime often lead to slow strategy development in regions, resulting in connection offers that remain

uncertain, as key details (such as substation locations and voltages) are left to be determined. While we hope that the changes proposed under Connections Reform and Strategic Energy Planning will address some of these issues, we recognise that certain connection offer details cannot be provided by networks due to factors outside their control.

Additionally, we believe most developers would be open to connection offers taking longer, within reason, if the offers were more certain. This would include clearer details on costs, works, and program timelines, which ties into our previous responses to questions 2c and 4c.

Finally, we think it would be incredibly valuable if networks provided supporting information regarding how electrical studies influenced the connection design in the offer, including any curtailment studies. This would not only help developers understand the rationale behind the DNO's decisions but also enable them to conduct their own evaluations and studies to assess the connection more thoroughly.

Question 4b. Do you have any views on proposal 4a (principles-based licence condition on the completeness / quality of the offer and supporting documentation)? Do you have any views on specific wording that would achieve the intended outcome?

Our response to this question aligns with our comments in questions 2b and 3b: while a principle-based license condition may be effective in theory, it requires additional supporting information to truly work. As such, we lean toward proposal 4b.

We also agree with the concerns raised regarding the re-evaluation of customer offers by DNOs and NESO if other developers drop out. This practice is generally seen as unfeasible and is only occasionally applied under exceptional circumstances. A broader issue within the industry is that regulations, such as P18, and considerations of fault levels and thermal-driven reinforcement needs, are rarely revisited to assess whether they are still necessary, leading to outdated assumptions and inefficiencies.

Question 4c. Do you have any views on proposal 4b (minimum standards / SLAs on the completeness / quality of the offer and supporting documentation)? Do you have any views on specific standards that could be introduced and how they would work in practice?

We believe that specific standards should be established for the quality of connection offers provided by network companies, particularly as one of the main

objectives of connection reform is to improve the overall process for all stakeholders. Several key standards could be introduced to support this aim.

Firstly, connection offers should be accurate and complete when they are first provided, requiring the establishment of a quality metric. For example, a measure could track how many offers require a reoffer from the network company to correct errors. Additionally, metrics and commentary on the reasons for reoffers (such as errors, incomplete data, or offers not reflecting the customer's request) should be captured. This information could also help inform the design of Service Level Agreements (SLAs).

Secondly, while a metric based on the time it takes to provide an offer should remain in place, it should undergo significant changes. The new metric should allow network companies to operate dynamically, prioritising their workload as needed. It should incentivise timely offers while accounting for the complexity of each connection. This approach would also need to consider the differences in connection processes between transmission and distribution (windowed vs. always open) and how embedded projects subject to a transmission impact assessment will be affected by three offers (the DNO's initial offer, the NESO to DNO window outcome, and the DNO's revised offer).

Lastly, we believe that minimum standards should be set for both DNO and NESO offers. Given the extensive range of items that would need to be included, this may require further consultation or an idea-sharing session with stakeholders to ensure all necessary components are covered.

Question 4d. What do you consider would constitute a 'high quality offer'?

Please see response to Question 4.e, below.

Question 4e. Is there anything else regarding Theme 4 - Quality of connection offers and associated documentation that you consider we have missed?

A high-quality offer should not only provide detailed technical specifications of the connection but also clearly identify any uncertainties or potential changes. It should outline any dependencies, such as one connection being reliant on others or specific projects being completed. For example, Connection C might depend on the completion of Connection A and B, and funding reinforcement, or Connection A could depend on the completion of specific DNO projects.

In addressing this question, we have considered a broader definition of a 'high-

quality offer'—one that includes not only the documentation itself but also the process by which the offer is created. We believe the key elements of a 'high-quality offer' (both process and documentation) include:

- Transparent and open communication between network companies and developers about the findings of network studies, the challenges these results present, and the constructive development of mitigation options, all while clearly indicating how this impacts the connection offer.
- Clear commentary and data from the network studies, explaining the options considered and providing a rationale for the selected option included in the offer.
- Ongoing, regular dialogue to ensure all parties are kept informed of the offer's progress, with agreed milestones confirmed and met for providing the offer.
- The offer documentation should be thorough and complete, with no uncertainties, missing details (such as location, works, or costs), and no bespoke terms that could allow the network to revise these details unilaterally at a later stage.
- The offer should be free from administrative or typographical errors.
- Clear guidance on how the costs in the offer are determined, including a reasonable breakdown of those costs and a transparent explanation of the options available to manage them.
- The offer should be accurate from the start, eliminating the need for reoffers. It should be right the first time.

Theme 5 – Ambition of connection offers

Question 5a. Do you agree with the issues we have set out under Theme 5 – Ambition of connection offers? Are there any other issues under this theme that we should consider or be aware of?

Yes, we agree with the concern raised in Theme 3 that networks might start offering overly conservative connection dates. To address this, measures should be put in place to ensure that connection dates are both realistic and timely.

Question 5b. Do you have any views on proposal 5a (strengthened principles-based

licence condition around offering earliest achievable connection dates)? Do you have any views on specific wording that would achieve the intended outcome?

We agree with the need for a license condition to address the risks outlined in Theme 5. However, as mentioned in our previous responses, we are uncertain how a principle-based license condition would be measurable or enforceable, as it offers limited scope for Ofgem to verify whether an offer meets the "earliest achievable" date. To provide a more concrete approach for such a license condition, we suggest the following ideas:

- One potential approach could focus on the difference between the connection date requested by the developer and the date provided by the network. Developers typically push for the earliest possible connection date, which could create a natural incentive for networks to provide timely information prior to the application to better manage the developer's expectations. However, there is a risk that this approach may lose effectiveness over time.
- Another option might be for NESO or an external party to offer an independent perspective on the delivery of works. While this could be valuable, it may not be feasible for smaller, localised works due to their volume and specific nature.
- Lastly, rather than evaluating individual connection offers based on this theme, a broader target to deliver megawatt capacity according to an agreed plan could be implemented. This plan would need to align with the government's Clean Power 2030 strategy (and subsequent Spatial Strategic Energy Plan), with the results reflected in the aggregate capacity delivered across the connection offers provided by network companies.

Question 5c. Is there anything else regarding Theme 5 - Ambition of connection offers that you consider we have missed?

No further comment.

Theme 6 – Minor connections

Question 6a – Do you agree with the issues we have identified? Are there any other

issues under this theme that we should consider? Please provide data and

evidence to support your views if possible.

We agree with the points raised, particularly the need to streamline the process for minor connections and reduce the administrative burden on DNOs. Increasing the threshold from 16 amps per phase to 32 amps for G98 connection notifications would significantly reduce the number of G99 applications submitted to DNOs. This change would alleviate pressure on DNO resources and facilitate the smoother deployment of solar installations.

Furthermore, sufficient resourcing at DNOs is crucial to handle the volume of applications effectively. The delay in receiving MPANs from DNOs directly impacts consumers, as it prevents them from accessing SEG (Smart Export Guarantee) payments. To address this, it is essential to standardise the SEG process, ensuring greater consistency and efficiency across networks.

We are also very supportive of implementing Service Level Agreements (SLAs) for minor connections, as these would help expedite the process and improve service quality.

Question 6b – What are your views on our proposals designed to address these issues? Are there other proposals you consider would achieve the intended outcomes?

No comment.

Question 6c – Do you have views on how poor performance could be addressed under these proposals to ensure the smallest scale customers are protected and LCT roll out is supported?

We agree with all suggested proposals.

Theme 7 - Provisions and guidance for determinations

Question 7a. Do you agree with the issues we have set out under Theme 7 – Provisions and guidance for determinations? Are there any other issues under this theme that we should consider or be aware of?

We agree with the issues raised, and believe they offer an early warning to Ofgem about potential challenges in the connections process, particularly with the significant changes currently being implemented. While it may not be feasible for Ofgem to intervene in every individual case, it remains unclear whether these instances are systematically logged and analysed to identify broader trends that

could warrant Ofgem's involvement at a more general level.

Question 7b. Do you have any views on proposal 7a (Ofgem to review the guidance for connection determinations)?

We believe the guidance for connection determinations should be reassessed; however, we are unable to offer further comments until more information is available regarding the proposed changes.

Question 7c. Is there anything else regarding Theme 7 - Provisions and guidance for determinations?

One potential solution to consider is the appointment of an independent expert arbitrator to deliver binding resolutions on connection disputes. Ofgem could then oversee this arbitrator, guiding the industry on any necessary policy and regulatory changes based on the outcomes.