

Connections Reform - Policy Consultation on Required Licence Changes Response Form

Data and confidentiality

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Do you want your response treated as confidential? Please choose the option that is relevant to you.

No

Please tell us if parts of your responses or your whole response contains confidential information and explain why below.

Consultation questions

Proposed Electricity System Operator Licence Conditions

General approach to changes to the Electricity System Operator licence

1. Do you agree that licence changes are necessary to adequately facilitate the policy intent of the reformed Connection Process, if it is approved?

Please provide the reasons for your answer.

Yes

We agree the licence changes are necessary to facilitate the policy intent of the reformed connection process. In addition to these changes, DNO licence changes are also required. There are a number of consequential implications on DNO processes not covered by the proposals. The detail is set out in our cover letter and our response to questions specific to Electricity Distribution Licence.

2. Do you agree with the approach summarised in paragraphs 3.2 to 3.8?

Please provide the reasons for your answer.

Yes/No

As with our previous response we agree with the objective Ofgem is trying to achieve, however we have no further comments on the ESO licence condition proposals.

3. Do you agree that we have considered all relevant areas of the licence which might need modifications, and that we have proposed changes in relation to all relevant matters? If there are areas we need to consider further, please specify. Also, please specify any matters that we have addressed but which you do not think should be relevant.

Please provide the reasons for your answer.

Yes/No

No further comment on ESO licence condition.

Section A: Definitions and Interpretation

Condition A1:

4. Do you agree that the new definitions as set out in paragraphs 3.12 to 3.19 and draft legal text in condition A1, as set out in Annex A, are necessary to and adequately facilitate the policy intent of the reformed Connection Process?

Please provide the reasons for your answer and any alternative suggestions if you disagree.

Yes/No

No further comment on ESO licence condition.

5. Do you agree that no changes are required to the existing definitions in condition A1, as set out in Annex A, and that the proposed new changes are enough?

Please provide the reasons for your answer and identify any changes you consider to be needed.

Yes/No

No further comment on ESO licence condition.

Condition B3: Conduct of ISOP Business

6. Do you agree this clarification in paragraph 3.21 and proposed text in condition B3, as set out in Annex A, is required?

Please provide the reasons for your answer.

Yes

We hold the view that a positive assertion from the Authority that compliance with the various Criteria/Methodologies is not discriminatory is needed. To rely on subjective views as to what is or is not "undue" will be open to interpretation which could lead to challenge from customers when we are following the expected requirements.

Condition C11: Requirements of a Connect and Manage Connection

7. Do you agree with the policy intent behind the changes we are proposing that these types of “full” offers will only be made to the “non-gated” applications or “Gate 2” applications?

Please provide the reasons for your answer.

Yes

We do not disagree with the policy intent, however, the general principle of distinguishing between gate 1 and gate 2 does not appear to have been thought through for Distribution. Further detail on this comment is set out in our response to question 46.

8. Do you agree that proposed text in condition C11, as set out in Annex A, gives appropriate effect to the policy intent?

Please provide the reasons for your answer.

Yes/No

No further comment on ESO licence condition.

Section E: Industry Codes and charging

Condition E2: Connection and Use of System Code (CUSC)

9. Do you agree with the policy intent behind the changes we are proposing in paragraphs 3.28 and 3.29?

Please provide the reasons for your answer.

Yes/No

No further comments.

10. Do you agree that proposed text in condition E2, as set out in Annex A, gives appropriate effect to the policy intent? Do you think any further changes would be appropriate?

Please provide the reasons for your answer.

Yes/No

No further comments.

Condition E12 (New): Connection Criteria Methodology

11. Do you agree with the proposal for the licensee to create and maintain the Connections Criteria Methodology as in paragraphs 3.30 and 3.34?

Please provide the reasons for your answer.

Yes

We agree, provided there is a mechanism ensuring NESO consider stakeholder views, inputs and concerns when reviewing any methodology. This should be clear and unambiguous, and any proposed changes should have at least 6 months' notice to allow for full implementation.

12. Do you agree with the objectives and scope of the Connection Criteria Methodology as in paragraphs 3.32 and 3.33, respectively?

Please provide the reasons for your answer.

Yes

Yes, however as per question 11 there needs to be a mechanism in place for reviewing of any methodology.

13. Do you agree that the new condition E12, as set out in Annex A, provides the right level of governance and industry engagement to ensure that the Connections Criteria Methodology is developed and modified in a robust manner?

Please provide the reasons for your answer.

Yes

We agree in principle, but with reservations. As noted previously there needs to be a mechanism to ensure NESO consider other stakeholder views, when reviewing any methodology.

There does not appear to be a formal route for other parties to raise issues or proposals regarding the Connection Methodologies (E12, E13, E14), and as the new Connection Methodologies will significantly impact network operators and customers, necessitating a formal route for these parties to raise concern is required *a long with a requirement for NESO to consider those concerns.*

Condition E13 (New): Connection Network Design Methodology

14. Do you agree with the objectives of the Connections Network Design Methodology as in paragraph 3.38?

Please provide the reasons for your answer.

Yes

There is a need for a mechanism to ensure NESO account for stakeholder views, inputs and concerns when reviewing any methodology.

15. Do you agree with the scope of the Connections Network Design Methodology as set out in paragraph 3.35 and 3.37 is aligned with the TMO4+ connection reform process?

Please provide the reasons for your answer.

No

We believe the scope needs to cover Distribution as well to ensure expectations and requirements are clear for all parties.

16. We have kept the licence change broad for 'preparing offers' as in paragraph 3.37. Should we be more specific with the scope to include further description in the licence that it will determine the queue order, study applications and assess the infrastructure required to enable/prepare offers to enter into a "Gate 2" agreement?

Please provide the reasons for your answer.

Yes

The scope should be more specific as keeping it broad creates risk of being open to interpretation and challenged, whereas specific is much more likely to be enforceable.

17. Do you agree that the proposed addition of conditions E13, as per Annex A, and in this section provides the right level of governance and industry engagement to ensure that the Connections Network Design Methodology is developed and modified in a robust manner?

Please provide the reasons for your answer.

Yes

While we agree with the proposed addition, we have reservations. There is a lack of clarity as to how consultations with interested parties will be taken forward.

Condition E14 (New): Project Designation Methodology

18. Do you believe the NESO should be able to designate projects for prioritisation in the circumstances as specified in paragraph 3.42?

Please provide the reasons for your answer.

Yes

We agree with this view however, as noted in our project designation consultation response, it is still unclear how this will roll down to the Distribution System. DNOs will have projects that should be able to use the project designation process, and likewise, there will be projects that DNOs would

nominate into this process if they believe there is a strategic network benefit of that project.

It is not clear what the practical process looks like, the level of agency that DNOs have in this process, who is responsible for the nomination of projects at distribution level, and how the information flows across the interface. It is also unclear how this would work with regard to customers providing evidence against these criteria. It is crucial that the criteria for prioritisation are transparent and that the decision-making process is well-documented and consistently applied to mitigate the risk of disputes.

19. Do you agree that the NESO should only be able to designate projects after a period of consultation as in paragraph 3.43, for existing agreements also in the first application window?

If not, please explain your reasoning, along with alternative suggestions if appropriate.

Yes

See response to question 18.

20. Do you agree that the proposed additions of conditions E14, as set out in Annex A, provide the right level of governance and industry engagement to ensure that the Project Designation Methodology is developed and modified in a robust manner?

Please provide the reasons for your answer.

Yes

As with question 17, we agree but with reservations, there is a lack of clarity as to how consultations with interested parties will be taken forward.

Condition E15: Requirement to offer terms

21. Do you agree with the requirements that an application window as in paragraph 3.56 is practical and sufficient? Please provide the reason for your answer. What is the right maximum and/or minimum period prescribed in the licence for how long the application window should be open? Is the minimum requirement of at least once every year sufficient?

Please provide the reasons for your answer.

We agree with the proposal to introduce a requirement for an application window for NESO-led work, we believe the minimum requirement should be more than once per year, to allow projects to progress. Finally, we would like to highlight that DNO-led connections progress to receiving an offer from the relevant DNO at any time and would then need to wait for a window to open to progress through a TEA, highlighting the need for more than once per year.

22. Do you agree that 6 months as mentioned in paragraph 3.59 to provide an offer once the application window closes is adequate? Do you agree with our proposed option regarding timing for the NESO to make offers, or do you prefer any of the alternative options set out in paragraph 3.60? Are there any other options we should be considering? Please provide the reasons for your answer and suggest alternative.

We have concerns about the impact this timing may have on customers as a 6-month window for a customer to receive an updated offer is potentially poor customer service. Poor customer service will be compounded by potential for delays if the process is not managed effectively and therefore timely processing of applications is essential to avoid delays in project development. Flexibility should also be maintained to accommodate exceptional circumstances that may require adjustments to the timeline and where the authority consents to such flexibility. Regular monitoring and review of the process will help ensure that it remains efficient and effective.

23. Do you agree with our proposed approach of specifying which type of applications get which type of offers as in paragraphs 3.52 to 3.55? Does this cover all type of applications?

Please provide the reason for your answer and mention if any type of applications is not captured in here.

We support the proposed method of specifying which types of applications receive certain offers. However, it is crucial that the criteria for these offers are clear and transparent, taking into account the differences between directly connected and embedded connections to prevent misunderstandings and disputes. Continuous review and stakeholder feedback should be encouraged to address any issues that arise with different types of applications and offers. Additionally, we believe there is a need to review the DNO embedded project process. We believe there is merit in a two gate process to ensure equivalence between embedded and directly connected connections, but that the Electricity Act and Distribution Standard Licence conditions must be amended to allow for this.

24. Do you agree that the proposed legal text in condition E14, as set out in Annex A, meets the policy intent above?

Please provide the reason for your answer.

Yes/No

No further comments.

Proposed Electricity Transmission Standard Licence Conditions

General approach to modification of the Electricity Transmission Standard Licence Conditions

25. Do you agree with our approach mentioned in paragraphs 4.1 to 4.3?

Please provide the reasons for your answer.

Yes/ No

No comments regarding the Transmission licence conditions.

26. Do you agree that we have considered all the areas of the licence which might
need modifications?

Please provide the reasons for your answer and specify if you think we have
missed some areas.

Yes/No.

No comments regarding the Transmission licence conditions.

Section D: Transmission Owner Standard Conditions

Condition D1: Interpretation of Section D

27. Do you think any other modifications to definitions are required for the
transmission licence in addition to the ones proposed for the System Operator
Licence in paragraphs 3.12 to 3.19, in the consultation document?

Please provide a reason for your answer.

Yes /No

No comments regarding the Transmission licence conditions.

28. Do you agree that the proposed text in SLC D1, as set out in Annex B, meets the policy intent?

Please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

29. Would you suggest any changes to the new and existing definitions in SLC D1 that are pertinent to Connections Reform?

Please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

**Condition D4A: Obligations in relation to offers for connection etc.
(Transmission Owners)**

30. Do you agree with the policy intent and the rationale described in the paragraphs 4.6 to 4.10, in respect of the changes to SLC D4A.1, in the consultation document?

Please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

31. Do you agree with the proposed changes to the text of SLC D4A.1, as set out in Annex B?

If you disagree or partially agree, please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

D4A.2- New proposed Paragraph 2 – requirements to offer terms requirements to offer to enter into agreement with the ISOP and provisions for that offer

32. Do you agree with the policy intent and the rationale for the proposed changes described in the paragraphs 4.11 to 4.13, in respect of the changes to SLC D4A.2, in the consultation document?

Please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

33. Do you agree that the proposed changes to the text of the new paragraph 2 of SLC D4A, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

D4A.2, D4A.3, D4A.4, D4A.5- Proposed paragraphs 3, 4, 5 and 6 (formerly paragraphs 2, 3, 4 and 5)

34. Do you agree with the policy intent described in paragraph 4.17, in respect of the changes suggested in paragraphs 2, 3, 4 and 5, now amended to become paragraph 3, 4, 5 and 6, of SLC D4A, in the consultation document?

Please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

35. Do you agree that the proposed changes to the text of the amended paragraph 3, 4, 5 and 6 of SLC D4A, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

Condition D16: Requirements of a connect and manage connection

36. Do you agree with the policy intent and the rationale in respect of the proposed changes to SLC D16 as described in paragraphs 4.19 to 4.23, in the consultation document?

Please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

37. Do you agree that the proposed changes to the text of SLC D16, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

New Condition D18: Requirements to comply with connection network design methodology for Use of System and connection (Transmission Owners)

38. Do you agree with the policy intent behind the proposed new licence condition as explained in paragraphs 4.24 to 4.26, in respect to the proposed SLC D18, in the consultation document?

Please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

39. Do you agree that the proposed text gives appropriate effect to the specific policy intent, as detailed in Annex B?

Please provide a reason for your answer.

Yes/No

No comments regarding the Transmission licence conditions.

Section E: Offshore Transmission Owner Standard Conditions

Condition E17: Obligations in relation to offers for connection etc. (Offshore Transmission Owners)

40. Do you agree with the policy intent and rationale in respect of the changes proposed to SLC E17, in paragraphs 4.28 to 4.34, in the consultation document?

Please provide a reason for your answer.

Yes/No

No comments regarding the Offshore Transmission licence conditions.

41. Do you agree that the proposed changes to the text in SLC E17, as set out in Annex B, effectively facilitate the policy intent?

Please provide a reason for your answer.

No

No comments regarding the Offshore Transmission licence conditions.

New Condition E25: Requirements to comply with connection network design methodology for Use of System and connection (Offshore Transmission Owners)

42. Do you agree with the policy intent behind the proposed new licence condition as explained in paragraph 4.35, in respect of the SLC E25, in the consultation document?

Please provide a reason for your answer.

No

No comments regarding the Offshore Transmission licence conditions.

43. Do you agree that the proposed text of the new condition, as detailed in Annex B, gives effect to the policy intent?

Please provide a reason for your answer.

Yes/ No Click or tap here to enter text.

No comments regarding the Offshore Transmission licence conditions.

Distribution Standard Licence Conditions – Policy Intent

Chapter 1: Interpretation and application

Condition 1: Definitions for the standard conditions

44. Do you agree that changes are likely be required to some of the definitions within licence condition 1?

Please provide the reasons for your answer.

Yes

We agree that changes will be required. Given the speed of change, we require precise detail of the Distribution Licence changes as soon as possible to allow us to enact the proposals alongside enabling legislative change. Whilst the definitions being proposed for other Licensees look sensible, we note that no definitive definitions have been provided for Distribution. The Distribution licence needs to be unambiguously clear that if DNOs comply with and implement the Connections Criteria - the Connection Criteria Methodology, the Connections Network Design Methodology and/or the Project Designation Methodology (or NESO decisions in relation to the Criteria) – that these do not contradict existing licence requirements.

In addition, Section.7(b) of the Electricity Act 1989 requires DNOs to facilitate competition in the supply and generation of electricity. Alongside the Distribution licence, Section 7 (b) should be amended to allow for compliance with the Connections Criteria - the Connection Criteria Methodology, the Connections Network Design Methodology and/or the Project Designation Methodology. In addition, Section.16 of the Electricity Act requires DNOs to offer a connection on request and consideration is required to ensure that DNOs can operate lawfully within the new proposed connections framework. We understand that DESNZ will be adding a new condition in its Planning and Infrastructure Bill to cover interaction with Section. 16 and Section.17 of the Electricity Act but DNOs have not seen these proposals yet.

DNOs are working via ENA to provide proposed licence changes to enable DNOs to implement reform proposals, including licence condition 1. Our view is that these changes will need to be implemented alongside changes to legislation. However, the proposals may guide the approach Ofgem wish to take.

Chapter 2: General obligations and arrangements

Condition 4: No abuse of the licensee’s special position

45. Do you consider any modifications to licence condition 4 are required?

Please provide the reasons for your answer.

Yes

We consider the need for modification to this condition as there is a high risk that DNO customers whose connections are not accepted for Gate 2 will legally challenge this decision. Under current proposals, it is DNOs who are at legal risk of this challenge, despite not driving forward the proposals.

Challenges could include customers taking legal action which will be timely and costly for DNOs, ultimately taking resource from progressing connections work. Accordingly, it is vital that the legal and regulatory framework is unambiguous to confirm that compliance with the Connections Criteria - the Connection Criteria Methodology, the Connections Network Design Methodology and/or the Project Designation Methodology as indicated by NESO will not be an abuse of the licensee's special position.

Without the licence and legislative change DNOs will not have the legal ability to apply connections reform. DNOs have existing contractual relationships with customers which do not give the DNOs the right to make changes for connections reform. Consequently, changes to the licence and legislation are required prior to final decisions being made on the methodologies.

DNOs are making proposals on licence changes (via ENA) which will be submitted as a follow up to the response to this consultation.

Chapter 4: Arrangements for the provision of services

Condition 12: Requirement to offer terms for Use of System and connection

46. Do you agree with the policy intent to modify licence conditions 12.1 and 12.4 under both scenarios?

Please provide the reasons for your answer.

Yes

We agree that changes to SLC 12 are required. It is likely that SLC 12.1 and 12.4 both require to be amended to allow for connection offers that do not include a firm connection date or include an indicative connection date. Having offers which appear to be firm but offer not finalised dates, location, works, and costs could lead to multiple complaints from customers.

As we have highlighted in response to Q7, we consider that further thought and work is needed on how the gated process at Transmission will flow down to Distribution. This detail is vital given that DNOs will need to enact the outcome of reform via contractual arrangements with its customers.

We consider that it would be counterproductive for DNOs to spend time and effort providing full formal offers to customers in technologies which are over-subscribed compared to the CP2030 technology quotas. Customers in this position will not be able to move forward to connection for a number of years and will take a place in the distribution queue. Consequently, we consider that these customers should only receive an indicative offer (in line with Gate 1 offer from NESO).

However, we are also aware that for technologies which are currently undersubscribed compared to CP2030 quotas, customers will need visibility of a full Distribution offer to help them understand if projects are commercially viable, ahead of moving to a Gate 2 Transmission offer.

Consequently, we consider it important that the licence changes to SLC 12 enable DNOs to provide indicative (Gate 1 type) offers to customers with technologies which are over-subscribed but full distribution offers to customers where we are undersubscribed against the CP2030 quotas. We are working with all DNOs via ENA to propose licence drafting which enables this.

Additionally, it is unclear what the impact on security charges will be and if the process will be updated. For example, where customers currently have security in place/connection charges identified, how will these change as a result of connections reform, and how and when will this be communicated to DNOs and customers.

Condition 19. Prohibition of discrimination under Chapters 4 and 5

47. Do you agree with our view that no changes to licence condition 19 are necessary under any of the two scenarios?

If no or you partially agree, please provide the reasons for your answer.

No

We disagree with the position that no changes will be needed to SLC 19 to facilitate connections reform.

As noted in previous responses, there is a risk that customers whose connections are not accepted for Gate 2 will challenge the decision, leading to potential legal action. As with our response to question 45, it is critical that the licence is clear that compliance with the Connections Criteria - the Connection Criteria Methodology, the Connections Network Design Methodology and/or the Project Designation Methodology as indicated by NESO is not discriminatory. This statement needs to be paired with the aforementioned express obligations to comply with the methodologies to remove any doubt over applying these processes. DNOs are working through the ENA to propose licence drafting to reflect this and will share with Ofgem in the coming weeks to support this consultation response.

48. If you disagree, what kind of change to the licence condition 19 do you believe is necessary?

Please provide the reasons for your answer.

As stated above, our preferred approach is for clarity in the licence that compliance with the Connections Criteria - the Connection Criteria Methodology, the Connections Network Design Methodology and/or the Project Designation Methodology as indicated by NESO is not discriminatory. We need this clearly stated in licence condition 19 in order to ensure that the appropriate application of methodologies and criteria cannot be challenged. DNOs, in partnership with the ENA, plan to share our proposed licence drafting with Ofgem in the coming weeks to support this consultation position.

Chapter 5: Industry codes and agreements

Condition 20. Compliance with Core Industry Documents

49. Do you see any risk related to introducing an obligation for DCUSA licensees to comply with the Clean Power 2030 Action Plan and SSEP?

Please provide the reasons for your answer.

Yes

We consider the proposed obligation is unnecessary if the Connections Criteria Methodology and Connection Network Design Methodology were designated in CUSC. Given DNOs and IDNOs have a licence condition to comply with CUSC, we think this would be the most efficient way to ensure compliance, rather than specific new licence drafting for DCUSA parties. It would also ensure proper governance around changes to the methodologies, which we have highlighted elsewhere as being required. If the CP2030 and SSEP change in the future, our proposed approach would also avoid having to make amendments to licence as well as code. Any update to DCUSA to include any such obligations need to be specific, which is a further reason why we believe the CUSC is the appropriate vehicle for inclusion of the obligations to comply with the Connections Criteria Methodology and Connection Network Design Methodology.

50. Do you agree with the changes suggested to licence condition 20?

If no or you partially agree, please provide the reasons for your answer.

No

We don't think these changes are necessary if the NESO design and criteria methodologies are designated in CUSC. As outlined in response to Q49, this is more efficient as a process and also brings the methodologies into industry governance which covers off concerns around the requirements being changes without proper consultation.

Condition 12A. Requirement to progress User applications into the Gated Window process

51. Do you agree with the proposal to define a new licence condition 12A.1 – requirement to perform “Gate 2” checks in line with the NESO methodology?

Please provide the reasons for your answer.

Yes

We agree that a new licence condition is required. Please see our response to Q47 and Q48 which outlines the reasons why changes are required.

The drafting proposals undertaken by all DNOs via the ENA should address this point.

52. Do you agree with the proposal to define a new licence condition 12A.2 – requirement to perform “Gate 2” checks in a timely manner? If so, do you consider the approach to the condition should be principles-based or prescriptive?

Please provide any information / evidence you can to support your response.

Yes

Yes, subject to the additional drafting developed by all DNOs.

New Conditions

New Conditions 12A.3 and 12A.4 - Submission of projects for transmission assessment

53. Do you agree with the proposal to define new licence conditions 12A.3 and 12A.4 - this would introduce a requirement to submit projects for transmission assessment within a timely manner?

Please provide any information / evidence you can to support your response.

Yes

As per our response to Q51, we agree with the proposals. In terms of practical implementation, one point which needs to be considered is the cut off period for

when the NESO closes a window, and timing of when DNOs receive applications. It can take up to 3 months to gather the relevant data and process a TIA application to the NESO. Therefore, if a customer applies to a DNO the day prior to the NESO window closing, we will not be able to submit that project ahead of the deadline. Therefore any licence obligations around submission of projects for TIA need to take this time period into account, as DNOs will be unable to submit a TIA once the NESO window has closed.

Proposed Electricity Transmission Special Licence Conditions

54. Do you think any Electricity Transmission Special Licence Conditions changes are required?
If you think that changes are required, please provide the reasons for your answer.

No further comments.

Proposed Electricity Distribution Special Licence Conditions

55. Do you think any Electricity Interconnector Standard Licence Conditions changes are required?
If you think that changes are required, please provide the reasons for your answer.

We have interpreted this question as relating to Electricity Distribution Special Licence condition, in line with the title.

It is worth highlighting that large generation customers who are likely to be impacted by TM04+ and connections reform, score DNOs' performance across the connections journey via the Major Connections Incentive (covered via special condition 4.5). While we will be ensuring very clear communication to customers on the impact of TM04+ and connections reform, there is a chance that if customers are not happy with the outcome of reform (and changes in queue position), this could be reflected in the scores that they provide to us. SSEN Distribution has passed the competition test in both its license areas for Distribution Generation. Consequently, satisfaction scores from DG customers will not impact the financial aspect of the Major Connections incentive. However, it may impact scores under the reputational incentive (and may impact financial incentive for other DNOs if they have not passed the competition test).

Consequently, we consider any unintended consequences of TM04+ and connections reform on the Major Connections Incentive need to be considered and noted.

Proposed Electricity Interconnector Standard Licence Conditions

56. Do you think any Electricity Interconnector Standard Licence Conditions changes are required?

If you think that changes are required, please provide the reasons for your answer.

No comment on Interconnector Licence Conditions.

Proposed Electricity Generation Standard Licence Conditions

57. Do you think any Electricity Generation Standard Licence Conditions changes are required?

If you think that changes are required, please provide the reasons for your answer.

No comment on Generation Licence Conditions.

General feedback

We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:

Do you have any comments about the overall process of this consultation?

Do you have any comments about its tone and content?

Was it easy to read and understand? Or could it have been better written?

Were its conclusions balanced?

Did it make reasoned recommendations for improvement?

Any further comments?

No further comments.