

Connections Reform - Policy Consultation on Required Licence Changes Response Form

Please provide your feedback using this response form and sending a copy to connections@ofgem.gov.uk by 5pm on 6th January 2025.

Data and confidentiality

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

Yes / No **No**

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

Not applicable

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/ No **Yes**

Changes are needed to update the licences to reflect the new regime.

In relation to the Connections Methodologies, it's vital that the licence changes properly reflect the safeguards Ofgem proposes in paragraph 2.23 to ensure engagement with and scrutiny by industry and the Authority.

Changes are also needed to ensure that the Licensees implement the reformed process efficiently. This means preventing the delays and inefficiencies that have hampered efficient connections for the generation projects under the current regime.

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

Please provide the reasons for your answer.

Yes/ No **Yes**

Whilst we normally agree there should be a balance between a prescriptive and a non-prescriptive approach, there are multiple examples of poor service delivery around connections that suggest a more prescriptive approach is needed to ensure NESO and other network licensees deliver connection services effectively.

We shared much of industry's concern with the extensive use of Methodologies instead of putting requirements into industry codes like CUSC. It's vital that the licence changes properly reflect the safeguards Ofgem proposes in paragraph 2.23 to ensure engagement with and scrutiny by industry and the Authority during any further development of the Methodologies. There must be a route for industry participants to propose changes.

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 **Yes**

Yes – mostly.

The following areas need to be considered further:

- 1) whether any amendments are needed to reflect changes to the final package of Connections Reform documents submitted to Ofgem by NESO on 20 December
- 2) NESO's role at the Transmission Distribution Interface - including in implementing TMO4+ vis-à-vis embedded generation, where some ambiguity may remain due to the pace at which the TMO4+ package final proposals were developed.

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 **Yes**

Broadly yes, noting we've not done a full legal review.
3.17 – do IDNOs need referencing separately to DNOs?

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 **Not answered**

Not answered

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/ No **Yes**

In principle yes, noting we've not done a full legal review of this change.

We agree that the TMO4+ model requires a change along these lines.

As per the EUK response, it is essential that the wording to avoid undue competitive advantage to parties is given careful thought.

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/ No **Yes**

In principle yes, noting we’ve not done a full legal review of this change.
The change is needed to reflect the difference between Gate 1 and Gate 2 offers.

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 **Yes**

In principle yes, noting we’ve not done a full legal review of this change.

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 **Yes**

Yes – this reflects the move to a gated process, and that site-specific details would only be included in Gate 2 offers.

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 **Yes**

In principle yes, noting we’ve not done a full legal review of this change.

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/ No **Yes**

Yes – noting our generally concerns about the risks of using of Methodologies in lieu of industry code changes.

Please also consider our concerns about the process as set out in Section 3:

- It's not clear enough how or if industry participants could propose a change to the Methodology ahead of the formal consultation process in E12.9.
- The consultation process in E12.9 resembles the EBGL Article 18 process. The rigidity of the Article 18 process led the ESO to conduct significant pre-consultation and co-creation activities ahead of publishing the formal Article 18 consultation (e.g. for Quick Reserve and DFS). Our concern is that the process as written in E12.9 is too inflexible and leaves little room or time for changes to be made to the proposal as a result of connection customer feedback during the consultation.
- We support the EUK suggestion that a condition for the publication to be easily accessible and intelligible should be added to the proposed conditions regarding publication.

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/ No **Yes**

Yes, but we're surprised that there is nothing there around efficient system operation that could account for consumer interests, in particular costs that are passed onto consumers. Perhaps the objective in 3.38 3) should be copied from the CNDM to this section?

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/ No **No**

No. Mainly because E12-4 and E12.16 alone result in a process that is too inflexible to allow proper stakeholder consultation, meaning that industry stakeholders would be reliant on NESO voluntarily running extensive pre-consultation engagement and co-creation activities in addition to the processes in E12.

The process set out in E12 is very similar to the EBR Article 18 consultation for NESO balancing products. On their own, Article 18 consultations by NESO do not provide sufficient industry engagement. In practice the NESO markets team must run extensive pre-consultation (workshops, bilaterals, informal written consultations) weeks or months in advance of the Article 18 consultation.

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/ No **Yes**

Yes, we agree the objectives are appropriate.

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.

Yes/ No **Yes**

Mostly yes, but it fails to account for the role of and NESO interactions with DNOs in the TMO4+ process on behalf of their embedded generation customers.

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/ No **Yes**

We agree with the EUK response "Given the importance of the areas covered when NESO is preparing an offer, and the need for clear information to be given to connecting customer, we would favour more specific conditions for NESO to meet when preparing offers."

- 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/ No **No**

No. Mainly because E13-4 and E13.15 alone result in a process that is too inflexible to allow proper stakeholder consultation, meaning that industry stakeholders would be reliant on NESO voluntarily running extensive pre-consultation engagement and co-creation activities in addition to the processes in E13.

The process set out in E13 is very similar to the EBR Article 18 consultation for NESO balancing products. On their own, Article 18 consultations by NESO do not provide sufficient industry engagement. In practice the NESO markets team must run extensive pre-consultation (workshops, bilaterals, informal written consultations) weeks or months in advance of the Article 18 consultation.

Condition E14 (New): Project Designation Methodology

17. 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/ No **Yes**

We agree that that NESO should have the power to designate projects in line with the criteria outlined.

There remains a need for further clarity on the criteria – for example what qualifies a project that 'materially' reduces the need for constraint management or what innovative 'novel-sub types' of technologies infers.

18. 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/ No **Yes**

We agree that NESO should only be able to designate projects after a period of consultation.

19. 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/ No **Yes**

The proposed text is appropriate but would benefit from more detail is needed on what constitutes the various use cases for Project Designation.

Condition E15: Requirement to offer terms

20. 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.

Yes/ No **No**

The proposal in 3.56 does not reflect the timings NESO discussed with market participants during the code modification working groups, or during more general engagement sessions with connection customers.

The version of TMO4+ developed for CMP434 was based on NESO:

- 1) opening application windows at least twice a year
- 2) application periods of around four weeks, with two weeks never being on the table.

On point 2, EUK members recall timetables previously presented by NESO showing applications would run for at least four weeks and a maximum of six weeks. The application period timing must allow for DNOs to aggregate evidence from their embedded generation customers.

Shortening the maximum length of the application window could be done in 2025 to ensure most applicants receive their new connection dates by the end of that year. But, that is in the expectation that NESO and DNOs will be doing considerable pre-work with connections customers to start collecting Gate 2 evidence for the “whole queue to new queue” exercise ahead of the formal gate opening.

21. 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.

Yes/ No **Yes**

For all developers of embedded generation assets, the 6-month time period to obtain a Gate 2 offer represents a significant extension to existing timescales. We have only supported TMO4+ on this in the expectation that this additional delay in obtaining offers will be compensated for by overall faster connection times.

We oppose the alternative option in 3.60 that could extend the enduring window timescale even further to 7.5 months.

We could support a specific clause for the initial ‘Gate 2 to whole queue’ exercise, provided this is not linked to an enduring window of 7.5 months.

We do not support the NESO having full discretion or more lenient timescales. NESO and the other network licensees must be able to be held to account for not providing timely offers. (The End-to-End review must ensure timely service delivery across the rest of the connections journey.)

Ofgem is aware of the issues all sizes of connection customers have faced with timeliness of service in recent years, including the fact that the ESO had to request an extension to the ‘Two Step Process’.

22. 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.

Yes/ No **See answer below**

The question is not completely clear. If the questions covers the difference between Gate 1 and Gate 2 offers, and who gets a Gate 1 and Gate 2 offer, then we believe that the text covers this OK.

23. 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 & do you mean E15?**

We do not support E15.9. because it appears to allow NESO to only open the application window once a year and only open the application periods for 2 weeks. This is counter to the second half of the CMP434 Workgroup discussions when NESO had agreed to open the application window every six months at least.

Proposed Electricity Transmission Standard Licence Conditions

General approach to modification of the Electricity Transmission Standard Licence Conditions

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

Please provide the reasons for your answer.

Yes/ No **Yes**

In principle we agree with the approach.

We've not conducted a full legal review of the TO licence changes and have focused our time on the NESO and DNO sections.

25. 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 **Yes**

In principle we agree with the approach.

Section D: Transmission Owner Standard Conditions

Condition D1: Interpretation of Section D

26. 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**

The definitions put forward are sufficient for the needed modifications.

27. 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 **Yes**

We've not conducted a full legal review of these, but they appear to match the policy intent.

28. 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**

We are not proposing any changes.

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

29. 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 **Yes**

We agree with the policy intent and rationale.

30. 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 **Yes**

We've not had a legal review of this, but the changes seem to match the policy intent.

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

31. 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 **Yes**

We agree with the policy intent and rationale.

32. 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 **Yes**

We've done a legal review of this, but the changes seem to match the policy intent.

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

33. 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 **Yes**

We agree with the policy intent and rationale.

34. 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 **Yes**

We've done a legal review of this, but the changes seem to match the policy intent.

Condition D16: Requirements of a connect and manage connection

35. 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 **Yes**

We agree with the policy intent and rationale.

36. 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 **Yes**

We've not done a legal review of this, but the changes seem to match the policy intent.

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

37. 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 **Yes**

We agree with the policy intent and rationale.

38. 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 **Yes**

We've not done a legal review of this, but the changes seem to match the policy intent.

Section E: Offshore Transmission Owner Standard Conditions

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

39. 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 Not answered

Not answered

40. 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.

Yes/ No Not answered

Not answered

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

41. 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.

Yes/ No Not answered

Not answered

42. 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 Not answered

Not answered

Distribution Standard Licence Conditions – Policy Intent

Chapter 1: Interpretation and application

Condition 1: Definitions for the standard conditions

43. 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/ No **Yes**

Definitions pertaining to the areas highlighted in the consultation would need defining within the license conditions.

Chapter 2: General obligations and arrangements

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

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

Please provide the reasons for your answer.

Yes/ No **Yes**

This would add necessary safeguards for any connections customers who feel they may have been discriminated against when the DNOs apply the “degree of selectivity” mentioned in paragraph 5.23.

We support the EUK text on this: “Should DNOs be made responsible for assessing the strategic alignment of projects when progressing them to Gate 2, serious consideration would need to be given to the license conditions they hold to ensure restrictions, disruptions or distortions to competition are not produced.

This would mean producing text in the distribution licence conditions clear reference to a definition for strategic alignment with CP30 and the SSEP and how that alignment interacts with the CNDM that DNOs can refer to when producing connection offers and progressing connections.”

Additionally we believe adding appropriate text to Condition 4 could help with market participant concerns around DNO impartiality in deciding on the strategic alignment status of battery storage projects that could be in competition with DNO CLASS assets in NESO’s balancing service markets (see Ofgem 12 December 2022 [Decision on the Regulatory treatment of CLASS](#)).

Chapter 4: Arrangements for the provision of services

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

45. 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/ No **Yes**

We agree with the position Ofgem sets out in paragraphs 5.22 to 5.24 on LC 12.1 and paragraphs 5.25 to 5.26.

Condition 19. Prohibition of discrimination under Chapters 4 and 5

46. 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.

Yes/ No **No**

As TMO4+ requires DNOs to – in Ofgem’s own words - apply “degree of selectivity” (paragraph 5.23). Ofgem should consider if changes are needed to LC 19 explicitly enable DNOs to implement alignment with CP30 and SSEP.

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

Please provide the reasons for your answer.

Ofgem should consider if changes are needed to LC 19 explicitly enable DNOs to implement alignment with CP30 and SSEP.

Chapter 5: Industry codes and agreements

Condition 20. Compliance with Core Industry Documents

48. 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/ No **No**

We see greater risks from **not** introducing such an obligation for DCUSA licensees to comply with the Clean Power 2030 Action Plan and SSEP

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

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

Yes/ No **Yes**

We agree with Ofgem's thinking that DNOs/IDNOs should have an explicit obligation to align the Connections Process with the SSEP and Clean Power 2030 Action Plan documentation.

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

50. 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/ No **Yes**

It is vital for all parties involved in the TMO4+ connections process (customers, DNOs, NESO) that the obligations on DNOs around performing Gate 2 checks and notifying NESO are crystal clear.

51. 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/ No **Yes**

Yes – both conditions 12A.1 and 12A.2 are required, and the conditions should be prescriptive.

Conditions 12A.1, 12A.2 and 12A.3 must work together so that a small / medium generator User that submits valid Gate 2 evidence to its DNO ahead of a given Gated Window is assured of the DNO submitting that project for TEA within that Gated Window.

The final wording on the time within which the DNO must complete the "Gate 2" checks within 12A.2 must line up with a binding requirement within 12A.3 to submit the User for inclusion in TEA within the next Gated Window.

New Conditions

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

52. 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/ No **Yes**

Yes – both conditions 12A.3 and 12A.4 are required, and the conditions should be prescriptive and binding – meaning stronger than ‘all reasonable steps’.

Ofgem is aware of multiple cases of poor performance and delays in DNOs submitting Project Progression – the current equivalent (as noted in 5.36). Ofgem is also aware that these delays led embedded projects to be disadvantaged in the transmission queue relative to transmission projects who initiated applications much later. The move to a six-monthly gates (or even annual gates, according to this consultation) makes the negative consequences of DNOs missing the Gate 2 deadline worse.

Ofgem must propose a strong and prescriptive condition, given the past issues with timeliness, the serious consequences of a project missing a gate and competing pressures on DNO resources.

Stronger wording is needed for both 12A.3 and 12A.4 to ensure DNOs are incentivised to submit projects into the TEA process within the soonest available Gated Window, or modification applications for large embedded generators. Wording the condition in terms of ‘all reasonable steps’ still leaves too much room for DNOs to delay submitting valid applications.

5.38 We acknowledge that similar timeliness requirements on DNOs at the T/D interface are already being proposed within CUSC changes. We are keen to hear stakeholders’ views on whether they consider also including such requirements in the distribution licence is necessary / justified, as we are proposing here

If approved by Ofgem the TMO4+ CMP434 original proposal will place a reasonable endeavours obligation on DNOs to submit customer’s Gate 2 projects into the next available window. WACM2 would make this an absolute obligation, and we strongly recommend Ofgem approves WACM2.

In both cases – original proposal or WACM2 – we believe that Ofgem’s proposal of a new licence condition 12A.1 would complement the CUSC changes.

The changes are required to both to provide utmost clarity to all stakeholders, including DNOs, on the situation at the transmission / distribution interface and avoid a repetition of past issues.

Evidence – Centrica has previously provided Ofgem with examples of extensive delays by several DNOs in submitting Project Progressions for individual projects to the then ESO. Typically, these have been delays of 6-9 months. Across several connections stakeholder forums, we’ve seen other developers say they’ve suffered from delays of up to 2 years.

Proposed Electricity Transmission Special Licence Conditions

53. 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.

Proposed Electricity Distribution Special Licence Conditions

54. 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.

Proposed Electricity Interconnector Standard 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.

No.

Proposed Electricity Generation Standard Licence Conditions

56. 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.

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?

[Write your response here]