

Connections Reform - Policy Consultation on Required Licence Changes Response Form

We are consulting on conditions in the Electricity System Operator, Transmission and Distribution licences in relation to the ongoing connections reform process, which aims to enable quicker connection for ready-to-connect projects that align with strategic energy system plans and provide a more coordinated and efficient network design for connections.

We would like views from stakeholders with an interest in the electricity connections process and the ongoing reforms. We particularly welcome responses from connection customers, developers and network companies. We also welcome responses from other stakeholders including members of the public.

Your feedback is important to this process. Please take this opportunity to provide any feedback that you may have. To aid your response, each question is linked back to the relevant document for ease of reference.

We encourage you to read the Connections Reform - Policy Consultation on Required Licence Changes and the subsidiary documents:

- **Annex A:** Proposed NESO Licence Modifications; and
- **Annex B:** Proposed Transmission Standard Licence Modifications before responding to the consultation questions.

This document outlines the questions for this consultation and once the consultation is closed, we will consider all responses.

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

We encourage early submission ahead of the deadline where possible to aid the processing of responses.

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Data and confidentiality

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Date of submission: 06/01/2025

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

No [Click or tap here to enter text.](#)

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/ No [Click or tap here to enter text.](#)

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

Please provide the reasons for your answer.

Yes/ No [Click or tap here to enter text.](#)

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 [Click or tap here to enter text.](#)

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 the ISOP is required to consider stakeholder views, inputs and concerns when reviewing any methodology. Please see response to question 13.

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 Click or tap here to enter text.

While we agree with the objectives and scope of the Connection Criteria Methodology, there are concerns about the potential for disputes if the criteria are not applied consistently. The current wording of the objectives is at a higher level than we would have expected as they do not set out the intent of the methodologies. We think this could cause issues as changes to the Methodologies are proposed as these are the reference to which changes will need to be assessed.

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/ [Click or tap here to enter text.](#)

We agree with the approach but believe the governance arrangements lack a formal mechanism for other parties to raise issues or proposals regarding the Connection Methodologies (E12, E13, E14).

The new Connection Methodologies, developed rapidly, will significantly impact network operators and customers. It's crucial to have a formal route for these parties to raise concerns to ensure they are considered by ISOP, especially in the early years of implementation. While balancing administrative burden is important, at a minimum, network companies should have a formal route to raise issues, as they are subject to the methodology requirements.

Currently, ISOP's annual review doesn't require broader consultation unless changes are proposed by ISOP, potentially overlooking wider industry experiences or consider any feedback received from industry. Although the Authority can instruct updates, there's no formal route for this to be based on issues raised by other parties.

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, we agree, provided there is a mechanism ensuring ISOP take into account stakeholder views, inputs and concerns when reviewing any methodology. Please see response to question 13.

The methodology needs to facilitate an efficient and coordinated network, support anticipatory investment, and ensure alignment with strategic energy plans. Ensuring that the methodology is applied consistently is crucial for mitigating the risk of inefficiencies and legal disputes. Clear guidelines and regular review are essential.

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.

[Click or tap here to enter text.](#)

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 [Click or tap here to enter text.](#)

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/ No [Click or tap here to enter text.](#)

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, provided there is a mechanism ensuring the ISOP considers stakeholder views, inputs and concerns when reviewing any methodology. 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, we agree that the ISOP should only be able to designate projects after a period of consultation. This ensures that stakeholders have the opportunity to provide input and that the decision-making process is transparent and inclusive. For existing agreements, this approach helps manage expectations and reduces the risk of disputes by ensuring that all parties are aware of and can contribute to the prioritisation process. However, it should be noted that there is a risk of an impact on other customers, and in extreme cases some customers will not be provided with a connection as a consequence of this. DNOs will have a part to play by proposing projects or inputting into the NESO consultation.

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/ No

Please see response to question 13.

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 ISOP-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 agree with the proposed option, that 6 months to provide an offer once an application-window closes is generally adequate. However, we have concerns about the potential for delays if the process is not managed effectively. Timely processing of applications is essential to avoid delays in project development. Flexibility should 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.

Yes/ No [Click or tap here to enter text.](#)

While we agree with the proposed approach of specifying which type of applications get which type of offers. However, it is essential that the criteria for different types of offers are clear and transparent and consider the differences between directly connected and embedded connections to avoid misunderstandings and disputes. Continuous review and stakeholder feedback should be encouraged to ensure that any issues emerging for different types of applications and offers are appropriately addressed. In considering this, we would add that there is a need to review the DNO embedded project process.

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 [Click or tap here to enter text.](#)

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

**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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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 Click or tap here to enter text.

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.

Yes/ No Click or tap here to enter text.

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.

Yes/ No Click or tap here to enter text.

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.

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, changes are required to definitions to add in new definitions within licence condition 1. As the Connections Process evolves, it is important that the definitions remain relevant and accurately reflect the current regulatory and operational environment. Regular review and updates to the definitions help ensure clarity and consistency, reducing the risk of misunderstandings and legal disputes.

DNOs are currently working through draft proposals on the changes required within the licence, to be sent to Ofgem post consultation response.

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, modifications to licence condition 4 are required to ensure alignment with the new Connections Process.

However, for Scenario 1 (readiness only checks for DNOs), the consultation suggests no change is required. DNO's believe that there is a need for adequate protection should scenario 1 be adopted.

DNOs believe it is imperative that an explicit carve out is added in the licence, such that compliances with these new processes does not constitute a breach of these obligations, mitigating any risks to legal challenge. Any modifications should be carefully considered and subject to stakeholder consultation to ensure they are effective and practical.

DNOs are currently working through draft proposals on the changes required within the licence, to be sent to Ofgem post consultation response.

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.

While we agree with the policy intent to modify licence conditions 12.1 and 12.4, ensuring they clearly defined and consistently applied.

The licence conditions need to reflect the new Connections Process, where only projects meeting the Connections Criteria will receive "Gate 2" offers. Ensuring that the modifications are clear and enforceable is crucial for mitigating the risk of disputes.

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

Changes are a must. DNOs believe it is imperative that an explicit carve out is added in the licence, such that compliances with these new processes does not constitute a breach of these obligations. These changes should be the same principles as the changes carved out for TOs and ESO licences. This would help mitigate any potential risks associated with differentiating between projects based on technology type or location.

DNOs are currently working through draft proposals on the changes required within the licence, to be sent to Ofgem post 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.

Licence Condition 19 should be amended to explicitly state that compliance with these new processes does not constitute a breach of these obligations. This would provide clarity and legal certainty for DNOs when projects that align with strategic energy plans are prioritised. This amendment helps mitigate the risk of legal challenges by ensuring that the prioritisation of projects is clearly justified and aligned with regulatory requirements.

DNOs are currently working through draft proposals on the changes required within the licence, to be sent to Ofgem post consultation response.

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

Yes, there is a risk for this being introduced. We believe an obligation to comply strategic plan is required; however, compliance with the CP30 plan and SSEP documents would not be appropriate due to their non-specific nature.

DNOs are working through where this is best placed within the licence and will provide further feedback through draft licence wording.

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

DNOs agree they need to comply with the intent of CP2030; however, this needs to be enacted through an obligation to comply with processes within methodologies rather than CP30 documentation.

DNOs are working through where this is best placed within the licence and will provide further feedback through draft licence wording.

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.

While we agree with the proposal in principle, checks are needed to be carried out to ensure no duplication between licence and CUSC proposed legal text. It is essential that the methodology is clear and that there are mechanisms in place to ensure its consistent application, and as such any licence condition is clear and transparent for all. This helps maintain the integrity of the Connections Process and ensures that network capacity is allocated efficiently and fairly.

DNOs are currently reviewing this and working through draft proposals on the changes required within the licence, to be sent to Ofgem post consultation response.

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.

DNOs would like to see what a principle and prescriptive option for this licence condition looks like before confirming which option is preferred. Furthermore, as per the above answer to question 51, duplication between licence and CUSC, as well as between 12A.1 and 12A.2 needs to be avoided.

DNOs are currently reviewing this and working through draft proposals on the changes required within the licence, to be sent to Ofgem post consultation response.

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.

Whilst we agree with the proposal in principle, checks are needed to be carried out to ensure no duplication between licence and CUSC proposed legal text. It is essential that the methodology is clear and that there are mechanisms in place to ensure its consistent application, and as such any licence condition needs to be clear and transparent for all. This helps maintain the integrity of the Connections Process and ensures that network capacity is allocated efficiently and fairly.

DNOs are currently reviewing this and working through draft proposals on the changes required within the licence, to be sent to Ofgem post consultation response.

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.

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 assume that "Interconnector Standard" in question 55 is an error and it should read "Distribution Special".

We do not think any changes to the Electricity Distribution Special Licence Conditions are required.

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.

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.

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?

We support the overall intent of the proposed reforms, which aim to enhance the efficiency and strategic alignment of the connections process. However, we would like to highlight several specific risks and issues associated with the proposals and offer suggested solutions to address these concerns.

Support for the Intent

The proposed Target Model Option 4+ (TMO4+) reforms are a significant step towards ensuring that the connections process aligns with the UK's net zero targets and strategic energy plans. We commend Ofgem's efforts to streamline the connections process and improve the management of the connections queue and new connection offers, which will ultimately benefit both the energy sector and consumers.

Specific Risks and Issues

Legal and Compliance Risks for DNOs

Risk: The current legislative framework, particularly sections 16 and 17 of the Electricity Act, may need to be reviewed for the TMO4+ proposals.

Solution: Amend sections 16 and 17 of the Electricity Act to provide specific exceptions for the application of the Strategic Alignment Criteria. Additionally, modify Standard Licence Conditions (SLCs) to include explicit obligations for DNOs to comply with the TMO4+ proposals.

Non-Discrimination and Competition Concerns

Risk: The differentiation between projects based on technology type, capacity, and location could be perceived as discriminatory and may not align with the non-discrimination requirements under SLC 19.

Solution: Ensure that any discrimination is objectively justified and explicitly addressed in the licence conditions. Amend SLC 19 to clarify that prioritising projects based on strategic alignment criteria does not constitute discrimination.

Compliance with Licence Condition 12.4

Risk: The requirement for connection offers to include a firm connection date may not be met under the new gated process, particularly for Gate 1 projects.

Solution: Amend SLC 12.4 to allow for indicative connection dates under the new process, ensuring that this is clearly communicated to applicants.

Judicial Review Risks

Risk: Ofgem and other authorities could face judicial review if the changes to the Connection and Use of System Code (CUSC) conflict with statutory duties or have retrospective effects on existing offers.

Solution: Provide robust transitional arrangements and clear communication to stakeholders about the changes and their implications. Ensure that the regulatory framework is fully aligned with the new strategic objectives.

Conclusion

We support the strategic direction of the TMO4+ proposals and believe that, with the suggested amendments and clarifications, the reforms can be successfully implemented. These changes will help mitigate legal risks, ensure compliance with existing legislation, and maintain a fair and non-discriminatory connections process.

We look forward to continued engagement with Ofgem and other stakeholders to refine and implement these important reforms. Thank you for considering our response.