Energy UK response to Connections End-to-end Review – Updated Proposals and Next Steps

27.02.2026

Submitted by email via connectionspolicy@ofgem.gov.uk.

About Energy UK

Energy UK is the trade association for the energy industry, representing companies investing billions of pounds to secure our country's current and future energy needs.

From growing start-ups to major electricity generators, grid and infrastructure developers and energy suppliers, our members are driving change across power, heat, transport and flexibility.

We provide a collective voice for the sector working with governments, regulators, charities and other organisations to provide crucial insight that shapes policy, offers solutions and promotes best practice.

Our broad view across the whole system supports evidence-based positions which are not tied to particular technologies, and are focused on delivering strategic benefits for people, businesses and the economy.

We champion initiatives such as our Vulnerability Commitment, which pushes suppliers to go beyond regulation to support customers with additional needs, and TIDE, the industry's drive for greater inclusion and diversity. Through our Young Energy Professionals Forum, we support the development of future leaders.

We are equally committed to our team and are proud to be recognised as a 'Gold' Investors in People employer.

Executive Summary

Energy UK welcomes this consultation and the efforts to date in delivering an end-to-end review of connections processes, and would note the following core positions.

- It is critical that the time taken to connect is not the only consideration, and that delivery of effective, robust, and reliable connection offers is considered a critical outcome of this work.
- Ofgem must clarify its role in the delivery of new standards, setting out how it will assess networks' implementation of any improvements and what measures will be taken if networks continue to deliver different levels of service across GB.
- The outputs of the review need to ensure that all parties involved in the connections process have clear, consistent roles and obligations, and complement – rather than conflict with – initiatives such as Connections Reform and network price controls.

If you would like to discuss anything noted in this response in more detail, please do get in touch.

Sincerely,

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Consultation Questions

Theme 1: Improving visibility and accuracy of connections data

Q1.1. Do you agree with Proposal 1.1. to introduce a new licence condition for accurate, complete and timely data?

Yes, Energy UK agrees with the proposal to introduce new license conditions requiring network operators at both distribution and transmission levels to provide real-time, accurate, complete and granular data on network capacity for both demand and generation.

The main consideration must always be providing data that is of value and focused on supporting network connections and effective system planning and delivery, thereby ensuring the work of networks remains economic and efficient. This developed list must undergo effective scrutiny from the industry, including a wide range of connecting parties and consumer representative organisations.

Network companies should provide functionality within their data visualisation tools and system-level data reports that enable connecting customers to request corrections, if they spot any data that is incorrect, and point out gaps where data is missing. However, there should be an upper threshold for the instances of incorrect data spotted by developers or a criterion, for example, if high-impact data is flagged as incorrect or the same data issue is flagged repeatedly, that triggers an independent audit of connections data.

Network operators convened multiple workshops with a variety of industry stakeholders under the Open Networks Project to agree a comprehensive list of useful connections data for network companies to publish, to ensure appropriate levels of granularity in the data to be published. Without Ofgem oversight, the data provided remains inconsistent, and some members view this data as focused on network outcomes, rather than the delivery of improvements in customer outcomes.

GIS data/interactive maps must be part of the data that is required to be published. This will allow developers to see spatial patterns, understand geographic constraints and avoid speculative applications. GIS data democratises access to data by displaying it in a visually user-friendly way. GIS data would also improve developers' ability to compare locations and understand the likely cost drivers of a connection at an early stage by showing, for example, distance to a suitable connection point, required voltage level, and whether reinforcement is likely to be needed.

To support effective and consistent implementation of GIS data, Ofgem could consider referencing existing examples of good practice as case studies. For example, platforms developed by organisations like Advanced Infrastructure demonstrate how spatial network data can be presented in an accessible, decision-supportive format for developers and planners. Referencing such examples could

help networks understand the expected outcomes, best practices and lessons learned that can be applied to their own approach.

Adequate data regarding Active Network Management (ANM) schemes should also be provided by network operators, including how often they curtail projects, how severe the constraints are, and what requirements and contractual frameworks are used by the network. ANM should be part of a project's functional specification, to give projects a clear understanding of how often they will be curtailed. This information can then be incorporated into the project investment case. This will give developers the confidence required to be more likely to accept non-firm connection agreements, allow for faster, cheaper connections and more efficient use of the network.

The format and granularity of this data should be standardised, with base requirements and additional good practice, and any instances of bad practice, shared publicly and used as the basis for constant improvements. Connection data should go down to the Secondary Substation level, including location for all DNOs, and provide information on electricity lines (EHV, HV and LV) whenever available. Estimation of electricity demand or measurements should be made available at the Secondary Substation level.

Whilst these new measures would improve visibility and accuracy of connections data, it is still important that current rules are mandated/enforced. Network operators are already required under licence arrangements and under the Connection and Use of System Code (CUSC) to publish information that allows potential users of their networks to identify and evaluate available opportunities, and are expected to comply with Ofgem's Data Best Practice Guidance. More clarity on how Ofgem will monitor and enforce delivery would be welcome.

Q1.2. Do you agree with Proposal 1.2. to split data into open and sensitive categories, and to use the Data Sharing Infrastructure to share sensitive data?

Yes, it would be sensible for network companies to convene multiple workshops to standardise data triage processes for connections, and for NESO, along with the Energy Networks Association (ENA), to coordinate these workshops.

These workshops should include equal representation between demand and generation customers.

Energy UK agrees with introducing a new licence condition requiring network companies to follow agreed data triage processes, given the general importance of data protection. Data triage processes should ensure that all datasets made publicly available are broadly or overwhelmingly accepted by industry as not being commercially sensitive information.

There will be instances where overwhelming acceptance is not possible or suitable. It would therefore be essential for DESNZ to be present in these workshops, given

considerations regarding data sensitivity, national security and system resilience that require Government oversight to provide a consistent national security lens.

Energy UK agrees with the proposal that sensitive connections data should be exchanged via the Data Sharing Infrastructure (DSI) and that there should be a functionality to allow organisations to validate participants' identities, as well as configure and control different access levels for different types of participants on a use case basis. This will make the DSI a trustworthy and secure solution for sensitive data exchange.

Data categorised as suitable for open data processes should be made available as soon as possible to aid ongoing connection processes aligned with Clean Power by 2030 (CP30), but sensitive data should only be made available when the DSI is fully operational in 2027, sticking to the agreed timeline for the DSI implementation.

Q1.3. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Transmission Operators (TOs) should provide greater transparency on substation design assumptions, siting, and related design works, where these affect connecting customers and where it is possible and/or not already the case. A statement of justifications, at the offer stage, should show the considerations made and the dependencies which influence the offers made by TOs. This should be supported by service-level expectations to ensure information is provided and updated in a timely and consistent manner.

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

Q2.1. Do you agree with Proposal 2.1, i.e., the milestones we have set out for inclusion in the prescriptive licence conditions? Are there any other milestones we should consider?

Yes, Energy UK supports the introduction of standardised timeframes for network companies to acknowledge and respond to initial pre-application contact.

Response-time obligations alone may not deliver consistent outcomes unless accompanied by minimum functionality standards within network contact systems. In particular, regulated parties should be required to provide accessible, clearly signposted mechanisms for initial contact, such as structured online enquiry portals with confirmation and tracking functionality, rather than reliance on generic inboxes.

Licensed response times should also be differentiated by network level and customer type, recognising the differing volumes, complexity, and constraints associated with

transmission versus distribution enquiries, and with demand versus generation connections. A differentiated approach would support proportionality while maintaining clear minimum standards across the sector. This could also be balanced against the Government's interest in network connections considered to hold national strategic importance.

Given the pace of digital development and evolving system needs, these licence conditions should be subject to periodic review, for example, at each price control cycle, to ensure that service standards remain appropriate, achievable, and aligned with wider incentives and obligations.

Energy UK agrees with the introduction of a minimum timeframe within which network operators must offer a pre-application discussion, and minimum requirements on the scheduling of connection surgeries for pre-applicants and the introduction of proof-of-intent requirements to manage speculative enquiries. These should be proportionate and not unduly disadvantage smaller developers who may not have the same level of in-house resources as major developers.

Industry workshops would be a useful mechanism to agree on what constitutes reasonable proof of intent at the pre-application stage. Acceptable proof of intent could include indicative site location, technology type and capacity, and the intended connection timeframe, even if at a high-level. For example, a “2027–2029” statement of development status, setting out the concept, early feasibility, and any land discussions underway.

Energy UK would also support the introduction of clear, standardised post-offer milestones, including minimum response times for project communications, timely programme kick-off meetings following offer acceptance, confirmation of key project personnel, and defined timeframes for detailed design and essential survey works. These measures would reduce uncertainty, improve accountability, and address delays that have been shown to impede connection delivery, while allowing appropriate differentiation by technology and customer type.

A standardised minimum timeframe should apply for network operators to issue a Statement of Works following a connection offer. This would reduce post-offer uncertainty, improve transparency, and help prevent avoidable delays, while allowing appropriate differentiation by project size, technology type, and network complexity. Ultimately, the framework must allow for open, honest and timely communications.

Q2.2. What processes/behaviours within the connections customer journey could be targeted effectively with a principles-based licence condition?

For larger embedded generation projects, principle-based licence conditions should enable tripartite engagement between the connecting customer, the Distribution Network Operator (DNO), and the Transmission Operator (TO) on the progress and coordination of required network reinforcement works. Larger embedded projects are likely to require transmission-level reinforcements. If connected successfully,

these projects can provide significant capacity of clean energy and/or, if these are demand projects, a significant positive impact on the local economy.

As such, it is appropriate that these project developers should be involved in discussions with both DNOs and TOs in one place to discuss reinforcement progression, as there could otherwise be misalignment between communications from DNOs and TOs, leaving projects left in the dark or blindsided. TOs should feel obligated to communicate effectively, not just to large transmission-level projects, but also to larger embedded projects at the distribution level. Cross-network coordination, including consistency in messaging to customers, should also be a principle-based licence condition.

For projects that have taken Final Investment Decision (FID), principles-based licence conditions should reflect the heightened importance of transparency and delivery certainty. In particular, TOs should be more mindful and provide clear and timely information on the status, risks, and expected delivery of any required network reinforcements, recognising the impact that delays or late-stage uncertainty can have on investor confidence.

Principles-based licence conditions should include consistent care of customer data and maintaining good knowledge of projects over their lifetime via procedural mechanisms to ensure lost files/data do not cause project delays.

Principles-based licence conditions should ensure that customers are provided with clear and accessible escalation routes where progress stalls or dependencies are not being met. These should help to ensure network companies act in a way that avoids introducing material new information or constraints late in the connections process, where these could reasonably have been identified earlier.

Q2.3. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Introducing more prescriptive licence conditions and principle-based licence conditions will allow for greater breadth of issues to be addressed, whilst recognising the need to balance non-negotiable standards and flexibility afforded to networks via principles-based licence conditions to ensure realistic and achievable measures are put in place. Principles-based conditions could also set the tone, underpinned by specific needs in codes, remaining cyclical in nature with the specifics governed by industry.

Energy UK agrees with leaving Transmission Impact Assessments and Third Party Works out of the scope, as these have been or are being addressed via code modifications and the wider connection reform plans. The effectiveness of these solutions should be monitored and revisited if proven ineffective in codes. Ofgem should clearly communicate to network operators the intention to monitor application

of these changes and to intervene if sufficient improvements are not delivered within a certain timeframe.

Theme 3: Requirements on networks to meet connection dates in connection agreements

Q3.1. Do you agree with Decision 3.1 to introduce a strengthened GSoP framework targeting connection dates? Do you have any views on specific design points, e.g., how should the value be set, should it be tailored to different customer types, what milestones should they be set against etc.?

Energy UK agrees with strengthening Guaranteed Standards of Performance (GSoP) for DNOs, as there is an industry perception, based on experiences with previous workstreams, that DNOs will only respond to hard obligations.

GSoPs should be developed via coordinated workshops chaired by Ofgem, with DNOs and developers in attendance, to get a balanced view of what these strengthened GSoPs should look like.

Ofgem needs to review how any proposals regarding holding DNOs to account fit into RIIO-ED3 and whether there is headroom to resource new obligations. Where new obligations are introduced, there needs to be resourcing clarity within price controls to prevent under-resourcing resulting in a failure to deliver.

If GSoPs are expanded to TOs, these should be tailored to TOs and not merely expanded from the GSoPs for DNOs. TOs face different challenges and hold different capabilities. Workshops with TOs and developers would again be beneficial in helping Ofgem make informed decisions when developing GSoPs for TOs.

GSoPs should also be reassessed for interactions with generation and demand projects, ensuring they are fair and tailored to both sets of circumstances at both transmission, if the GSoP is expanded to transmission level, and distribution level. Including demand customers in development workshops would also be beneficial in these circumstances.

Historically, GSoPs have focused on simpler, repeatable connection activities and have, therefore, not extended to large embedded demand projects, which were typically managed via bespoke contractual arrangements. However, as large electric demand becomes important to system transformation, the absence of comparable delivery protections shows a growing gap in the regulatory framework. There should be the same level of GSoP protection for large embedded demand, for example, electrified industrial heat, as there is for smaller demand, given the general increasing push for electrification.

While Energy UK supports the use of financial incentives/bonuses to encourage the timely delivery of connections by TOs, incentive frameworks should clearly distinguish between meeting agreed obligations and outperforming them. In

particular, delivering connections on time should be treated as a baseline expectation, with financial rewards focused on genuinely early delivery. This would better align incentives with performance and avoid rewarding outcomes that should reasonably be expected.

Bonuses to TOs for early delivery should only apply where it is of genuine benefit to the customer. To ensure this happens, both parties will need to work together; there is little point if network operators can bring a completion date forward in a contract if the user cannot respond to that new timeline.

Penalties for failing to meet delivery standards should be proportionate to the degree of control exercised by TOs and DNOs and the scale of consequences, rather than being uniform across network types and circumstances.

Q3.2. Do you agree with Decision 3.2 to develop mechanisms to improve the transparency of GSoPs compliance performance?

Yes, transparency adds another layer of mechanisms that incentivise network operators to deliver the new minimum delivery standards required of them via GSoPs.

Energy UK agrees that mechanisms such as a yearly audit against GSoP compliance, or public reporting of GSoP compliance performance, would help to enable this.

Each network operator should publish a report on their website that details their performance against the GSoP metrics. This would enable the creation of a report/leaderboard comparing all of the network operators' ability to adhere to GSoP metrics, including: volume of GSoPs triggered, the percentage of GSoPs paid out when triggered, the length of delays against milestones along the customer journey, and the percentage of connection dates met relative to offer dates. These metrics should be published on the Ofgem website.

Q3.3. Do you agree with Proposal 3.1 to explore further the introduction of liquidated damages as standard into connection contracts? Why do you consider liquidated damages are not currently inserted into contracts between the customer and the network company?

If implemented, Liquidated Damages (LD) could be applicable for missing the connection date and for missing key milestone dates. Different milestones, along with the connection date, could have different LD payouts depending on the importance of the milestone, reflecting their relative importance to project delivery. There could also be a metric/formula that helps require minimum LD depending on, for example, the size and type of the project, to avoid LD being too arbitrary, but any introduction of LD should be done after extensive talks with network operators, ensuring proportionality, based on some delays being out of their control.

Ofgem should exercise caution to ensure that NESO/TOs do not look to cover the risk of LD by increasing security payments or incorporating the cost into their price control. Ofgem should bear in mind that investors may seek a higher rate of returns to compensate for the risk of LD for network operators. This is likely to be seen regardless of how network operators recover the costs of LD from customers. Network operators are subject to grid infrastructure supply chain constraints that could be out of their control, as recognised by the Transmission Acceleration Action Plan and associated work.

Some project developers recognise that LD could be applied in both directions, and that this may increase project risk and overall costs to consumers as network operators and connecting parties alike increase investment premia in line with the risk profile. LD may have minimal impact if underlying structural reform is not implemented as well, such as improving NESO-TO coordination. LD may not fully compensate for delays and may appear to be a superficial measure if incorrectly weighted. Some members consider there to already be an LD mechanism targeted at developers, as network operators can terminate agreements and retain securities.

Furthermore, an LD mechanism is already included in the contracts for transmission-connected projects - construction agreements - relating to NESO delays in meeting the commissioning programme, for example. However, the figure in these arrangements is defined in Appendix K and set at zero, calling into question the value of the mechanism.

If input into contracts, it could be difficult to prove fault and hold network operators to account via LD mechanisms, so further guidance, clear frameworks, and routes to redress would be required.

Ofgem should exercise nuance, and any changes must consider the allocation of risk between project developers and network operators and ensure risk is distributed fairly, and that unintended consequences are mitigated by clear guidance, obligations, and conditions. Coordinating LD introduction with broader measures to ensure ambitious connection dates (as under Theme 5) would be critical to the success of the approach.

Q3.4. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

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<u>Theme 4: Quality of connection offers and associated documentation</u>

Q4.1. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Energy UK supports the decision to explore both prescriptive and principles-based licence conditions to improve the quality, clarity, and consistency of connection offers. Introducing minimum standards on offer content, alongside principles to support clear communication and engagement, would materially improve transparency and usability for customers.

Energy UK agrees that these standards should be reinforced through appropriate metrics in RIIO price controls, to ensure that improvements in offer quality are effectively incentivised and consistently delivered.

It is important to recognise that distribution-level projects are often subject to shorter offer acceptance periods than transmission-level projects. This makes the provision of clear, comprehensive technical and financial information particularly important at the distribution level, to enable customers to make informed decisions within limited timeframes. Minimum standards for offer content should ensure that sufficient technical and financial detail is provided to enable informed decision-making within distribution-level offer acceptance timeframes.

It is reasonable that connection offers for non-firm connections include a greater level of information than firm offers, reflecting the additional operational and commercial risk borne by the customer. Customers accepting non-firm terms should be provided with clear information on potential curtailment, including likely percentages of time curtailed and the amount of capacity to be curtailed, relevant network constraints, and any applicable ANM arrangements, to enable informed assessment of risk and investment decisions.

Furthermore, principle-based licence conditions should encourage all network operators to provide a centralised connections portal through which customers can access connection offers and related documentation. Providing a secure, accessible portal would reduce the risk of offer information being missed due to email-only communication and would materially improve transparency, reliability, and the overall customer experience, consistent with approaches already adopted by NESO.

Principles-based licence conditions could also improve transparency regarding the cost of connections. There could be a process for connection costs to be published to customers, aligned with the Appendix Q Milestones for a customer's connection. This could further incentivise network operators to procure equipment in advance of need to secure competitive prices for works or hedge against market volatility, which could reduce the amount of cost increases passed onto customers.

Theme 5: Ambition of connection offers

Q5.1. Do you have any views on Proposal 5.1, i.e., the concept of an 'energisation window' with a start date, acting as an ambitious target, and an end date, acting as a backstop?

Energy UK members hold varied views on the proposal for an ‘energisation window’, with a number of members opposed entirely.

Some members agree with implementing this approach, but all agree that further detail is required regarding the practicality, the level of control for developers, and the level of certainty within the offer. Large and complex projects need a stable and certain connection date to be provided, particularly for eligibility for Contracts for Difference (CfD) and other market mechanisms.

Energy UK recognises the desire from Ofgem to avoid conservative timelines for connection by networks wishing to avoid repercussions for failures to meet timelines, but concerns remain regarding the value of energisation windows as a means to resolve this.

An energisation window could prevent overly conservative connection dates from occurring if Liquidated Damages were strengthened/mandated. This approach would allow Network Operators to innovate and experiment with processes to improve efficiency, but would need to be balanced with a fundamental need to give developers certainty about timelines. As such, these windows should only be applied where the developer has opted into the process.

Energisation Windows could be useful where they allow a connection date to be pushed back (within the energisation window) by the developer without having to submit a full Modification Application.

An energisation window could increase inefficiencies and uncertainty in the development process as projects struggle to align development schedules around a range of potential outcomes. For many of these projects, a network suddenly advancing the date of the connection would result in significant changes to timelines for project development, and could present a timeline that is impossible to meet, if forward warning is not given sufficiently in advance.

The concept of an energisation window would have to be carefully designed if implemented, as there are worries that it could be impractical if developers have milestones with no window.

Ofgem should consider creating the option of selecting an energisation window in place of a firm connection date, to enable experimentation and test the approach.

Q5.2. Do you have any views on Proposal 5.2, i.e., the concept of an ‘opt-in’ mechanism for earlier connection dates, to provide optionality for customers to accept earlier connection dates if one becomes available?

Energy UK supports the proposed ‘opt-in’ mechanism, whereby network companies may make alternative connection offers to customers where delays or advancements result in a change to the originally offered connection date.

An opt-in approach appropriately allows customers to choose whether to pursue earlier connection opportunities. Importantly, making this mechanism optional protects more complex projects, which require stable and reliable connection dates, from being assigned earlier dates that they may not wish to accept or be able to meet.

Anything else:
Above all else, customers require robust offers with an element of certainty regarding timely delivery, and an ability to rely on the outcome being suited to their needs, especially for Gate 2 offers. The quality of the connection offer is, in most cases, more important than securing an "early" connection date.

Q5.3. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Principles-based licence conditions should encourage a revised/improved connection offer after the original connection offer if the opportunity allows.

Any revised connection offers should adopt the same time-window-based approach as the original offer, if and where this is introduced, to ensure consistency.

Energy UK agrees that connection dates should be grounded in robust technical assessments of capacity and availability. There is value in network operators conducting regular reviews of connection schedules to identify opportunities for acceleration where feasible, especially in light of the pressure to meet CP30 and wider electrification ambitions and targets.

This could be implemented either through a prescriptive licence requirement for periodic schedule reviews, or through a principle-based obligation where a more flexible approach is appropriate. In either case, transparency could be supported through regular reporting and setting out whether reassessments of capacity have identified opportunities for earlier connections.

Energy UK supports the proposal to introduce a principles-based licence condition requiring network companies to offer ambitious yet achievable connection dates. However, this obligation will be most effective if paired with stronger and clearer delivery obligations.

Some members note that milestones and the ambition of connections should align with their own project programme milestones, and that delivery certainty against key project-critical milestones may be more useful than abstract or arbitrary delivery incentives.

Theme 6 – Minor / Smaller Connections

Q6.1. Do you agree with our five decisions, and our planned approaches to taking them forward?

Yes, Energy UK agrees with all five decisions.

Decision 6.6, the decision not to strengthen installer obligations to notify DNOs, should be reviewed if issues with managing voltage levels on the low-voltage network and system stability issues persist.

The minimum standards for smaller connections should be formulated with DNOs in mind, as flexibility may need to be given to accommodate regional network differences and circumstances outside of the networks' control. For example, obtaining wayleaves and permits. The minimum standards should be realistic and practically applied across all DNO areas.

Minimum standards relating to approvals, quotations and response times, service-based standards through customer feedback are a good start. Where customer satisfaction standards are hugely exceeded, or minimum standards greatly surpassed, especially relating to LCTs like heat pumps given national targets, rewards could be offered to the DNOs as an incentive. This could drive adoption of LCTs via improved customer experiences.

Where possible, DNOs should be required to align processes for smaller connections to avoid postcode-lottery outcomes for customers seeking to connect low-carbon technologies. Greater consistency in customer-facing processes would support fair access, improve customer confidence, and help enable more uniform adoption of LCTs and flexibility services across GB.

Publishing performance data via Ofgem as a mandatory and regulatory requirement will support transparency and add a reputational element to incentives surrounding facilitating smaller connections. A new consumer body should not be considered, given the potential cost to consumers.

Reviewing GSoPs as they relate to smaller connections is a sensible step towards strengthening standards and services for smaller connections.

Q6.2. For Decision 6.1 – We understand that the time required to complete connection activities can differ depending on the scope of work. To help us establish appropriate expectations, we would welcome your views on suitable timeframes for the DNO to complete the following activities once the customer submits a formal application/request:

i. fuse upgrades
ii. cut out upgrade
iii. three-phase supply upgrades
iv. service cable upgrade
v. unlooping (reactive)

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Q6.3. For Decision 6.2 – What information could DNOs provide, clarify, or signpost to, which would make the connections application process simpler for installers/customers? For example, what sort of information could they provide on their websites?

DNOs could provide clear instructions on how to notify the DNO of an LCT installation, the average time to connect to the network, based on technology type and capacity of the LCT, examples of completed application forms, and capacity thresholds that trigger additional assessment.

Q6.4 – For Decision 6.3, how could Ofgem strengthen its approach to monitoring, reporting, and enforcement when poor performance is identified? What – in respondents' views - should be the frequency of DNO reporting?

Publishing performance data and comparing best practices and outcomes across DNOs to set a basis for their performance. Where poor performance is identified regarding facilitating smaller connections, Ofgem should be comfortable with publicly setting out which networks are performing best and which have areas for improvement.

DNO reporting should occur at least annually; this is not too administratively burdensome and allows for year-on-year improvement.

Q6.5. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

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<u>Theme 7: Provisions and guidance for determinations</u>

Q7.1. Do you agree with Proposal 7.1 that requires network companies across transmission and distribution to explore standardising their dispute resolution processes?

Yes. Network operators, with the help of the ENA, NESO and Ofgem, should agree on uniform dispute resolution processes. If network operators are unable to agree on a single uniform process, then Ofgem should intervene to impose a standard approach.

All customers should face the same or similar dispute resolution processes. This could be done in transition, with similar processes at first and then moving to a single process, given that network operators may have different capabilities. A uniform

functionality across networks, for example, a single disputes portal, should be explored.

Standardised dispute resolution processes provide a better customer experience for developers with different projects in their portfolio situated in different areas of the country.

Energy UK supports the upgrading of the Determinations Gateway so it can track and analyse the cases people bring to it rather than just handling them one by one. This approach should help address recurring issues more effectively and reduce the need for repeated disputes.

Q7.2. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

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