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Workgroup Consultation Response Proforma

CMP470: Introducing an Oversubscribed Technologies

Commitment Fee

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to cusc.team@neso.energy by **5pm** on **30 April 2026**.

Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact cusc.team@neso.energy

Respondent details	Please enter your details	
Respondent name:	Henry McDonald	
Company name:	Votwise Power Holdings Limited	
Email address:	hm@votwisepower.com	
Phone number:	07554 879 682	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input checked="" type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

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I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Panel or the industry for further consideration)

For reference the Applicable CUSC (Connection charging) Objectives are:

Means the Use of System Charging Objectives, as if references therein to the Use of System Charging Methodology were to the Connection Charging Methodology and in addition, the objective (where consistent with the other objectives) of facilitating competition in the carrying out of works for connection to the National Electricity Transmission System.

For reference the Applicable CUSC (non-charging) Objectives are:

- i. *The efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence*;*
- ii. *Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;*
- iii. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency **; and*
- iv. *Promoting efficiency in the implementation and administration of the CUSC arrangements.*

* See Electricity System Operator Licence

**The Electricity Regulation referred to in objective (iii) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the

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internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.

For reference, (for consultation questions 5) the Electricity Balancing Regulation (EBR) Article 3 Objectives and regulatory aspects are:

- a) fostering effective competition, non-discrimination and transparency in balancing markets;*
- b) enhancing efficiency of balancing as well as efficiency of national balancing markets;*
- c) integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
- d) contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;*
- e) ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;*
- f) facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;*
- g) facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.*

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What is the EBR?

The Electricity Balancing Regulation (EBR) is a European Network Code introduced by the Third Energy Package European legislation in late 2017.

The EBR regulation lays down the rules for the integration of balancing markets in Europe, with the objectives of enhancing Europe's security of supply. The EBR aims to do this through harmonisation of electricity balancing rules and facilitating the exchange of balancing resources between European Transmission System Operators (TSOs). Article 18 of the EBR states that TSOs such as the NESO should have terms and conditions developed for balancing services, which are submitted and approved by Ofgem.

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions

1	Do you believe that the Original Proposal better facilitates the Applicable Objectives versus the current baseline?	Mark the Objectives which you believe each solution better facilitates than the current baseline:	
		Original	<input checked="" type="checkbox"/> i <input checked="" type="checkbox"/> ii <input type="checkbox"/> iii <input checked="" type="checkbox"/> iv <input type="checkbox"/> None
		Original proposal will force speculative developers to leave the queue thereby removing surplus capacity Baseline: The current connections regime (post-Connections Reform), with no OTCF, relies on natural, late queue attrition. Applicable Objectives: The CUSC aims to enable efficient network planning, support viable projects, promote competition, and protect consumers.	

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2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>The original proposal (£10k/MW up to £25k/MW, implemented on 1st Jan 2027) appears a good solution. Implementing OTCF at the first biannual securities statement after G2TWQ offers are signed. This places practical application around October 2027, with the aim of avoiding reliance on assumed acceptances, basing grid activation on a near-complete queue and ensuring developers can factor OTCF risk into Gate 2 acceptance decisions.</p>
3	Do you have any other comments?	<p>Any watering down of the original Field energy proposal will have a contradictory effect on what the modification set out to achieve and have a limited impact of reducing the queue.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section of CMP470) <input checked="" type="checkbox"/> No <p>We support the original Field Energy proposal.</p>
5	Do you agree with the Workgroup's assessment that the modification does not	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code?	CMP470 only affects connection securities and cancellation charges. It does not affect balancing, dispatch, or market operation - Therefore, EBR Article 18 is not impacted.
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Specific Workgroup Consultation questions

6	Do you agree with the workgroup's understanding of the issues which oversubscription creates?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>Oversubscription will result in viable projects stuck behind unviable projects due to the amount of BESS projects that received Gate 2 Offers. Voltwise's position is that Connections Reform has resulted in more Gate 2 projects than stipulated by CP30 targets.</p> <p>NESO and Transmission Owners are obligated to plan for 90GW of BESS (Oversubscription of 60GW against plan), but this wasted time, effort and resource for projects that will never be built</p>
7	Do you have evidence which may support the	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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	Workgroup in understanding what proportion of projects in the Gate 2 queue are unviable?	Click or tap here to enter text.
8	Do you have any comments on the Workgroups understanding of technical and economic viability of projects?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Voltwise agree with the workgroups understanding of technical and economic viability. Technical viability - has planning consent, Meets Gate 2 criteria, technically capable of connecting.</p> <p>Economic viability - Site access and land constraints mitigated, Ground conditions and cable routes suitable, Attributable works and connection costs are commercially viable including queue saturation considerations along with balance sheet capability - Realistic revenue assumptions.</p>
9	Do you agree with the proposed activation threshold of 50% oversubscription and deactivation threshold of 25% oversubscription?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Some redundancy must be factored in as even some viable projects may fall away. 50% will only go part way to reducing the queue.</p>

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10	Do you think the OTCF should apply based on national or regional oversubscription?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No NESO are unclear on how to zone due on going works streams for SSEP so it should be based on National zones
11	Do you agree with the proposed timing of the OTCF from implementation or Gate 2 contract signature (whichever is sooner) up to energisation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The queue needs to be cut, and you should be liable from the earliest Securities windows - April 2027
12	Do you agree with the proposal to apply the OTCF as a securities floor?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
13	Do you agree with the level of the OTCF, including minimum and maximum levels if changing over time?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No We agree with the original proposal of £10K per MW scaling to £25K MW commencing from Jan 2027 as per the original proposal
14		<input checked="" type="checkbox"/> Yes

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	Do you agree that the OTCF should be applied to projects which co-locate an oversubscribed technology with another technology?	<input type="checkbox"/> No
		Oversubscription should be applied to the individual technology and if this makes combined project unviable then this is serving the purpose of the modification as the project is not viable.
15	Do you agree that the OTCF should apply as well as the PCF?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Project Commitment fee and OCTF are both designed to encourage projects to progress or remove from the queue. PCF is only relevant to projects that have not achieved Planning so this is not a consideration when applied to the BESS queue
16	Do you agree that any OTCF funds relating to a customer which does not go on to energise should be returned to consumers via TNUoS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Click or tap here to enter text.
17	Do you agree that NESO should have the	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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	option not to implement the OTCF if the activation threshold is breached?	
		We need to make the queue smaller
18	Do you agree with the proposed Alternative Request 1 solution?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		There should be no further delay to the implementation of the original OCTF as proposed by Field Energy
19	Do you agree with the proposed Alternative Request 2 solution?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		This would have no impact on the queue and render the modification worthless.