

Public

## Workgroup Consultation Response Proforma

### CMP471: Interim Connection Date Delay Process Ahead of CMP434 Gated Application Window

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](mailto:cusc.team@neso.energy) by **5pm** on **24 July 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](mailto:cusc.team@neso.energy)

| Respondent details                             | Please enter your details                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                   |
|------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Respondent name:</b>                        | David Barber                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                   |
| <b>Company name:</b>                           | GridLink Interconnector Ltd                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                   |
| <b>Email address:</b>                          | David.barber@gridlinkinterconnector.com                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                   |
| <b>Phone number:</b>                           | 07767872307                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                   |
| <b>Which best describes your organisation?</b> | <input type="checkbox"/> Consumer body<br><input type="checkbox"/> Demand<br><input type="checkbox"/> Distribution Network Operator<br><input type="checkbox"/> Generator<br><input type="checkbox"/> Industry body<br><input checked="" type="checkbox"/> Interconnector | <input type="checkbox"/> Storage<br><input type="checkbox"/> Supplier<br><input type="checkbox"/> System Operator<br><input type="checkbox"/> Transmission Owner<br><input type="checkbox"/> Virtual Lead Party<br><input type="checkbox"/> Other |

Public

**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*)

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

## Public

\* 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 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 & 6) 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;*

## Public

- 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.*

### 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 facilitate the Applicable Objectives versus the current baseline? | Mark the Objectives which you believe the Original Solution better facilitates than the current baseline: |                                                                                                                                                                                                                         |
|   |                                                                                                                    | Original                                                                                                  | <input checked="" type="checkbox"/> i <input checked="" type="checkbox"/> ii <input checked="" type="checkbox"/> iii <input checked="" type="checkbox"/> iv <input type="checkbox"/> v<br><input type="checkbox"/> None |
|   |                                                                                                                    | Click or tap here to enter text.                                                                          |                                                                                                                                                                                                                         |

## Public

|   |                                                                                                  |                                                                                                                                                                                                              |
|---|--------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                                                  |                                                                                                                                                                                                              |
| 2 | Do you support the proposed implementation approach?                                             | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No<br><br>Click or tap here to enter text.                                                                                               |
| 3 | Do you have any other comments?                                                                  | No additional comments                                                                                                                                                                                       |
| 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 <u><a href="#">Workgroup Consultation Section</a></u> )<br><input checked="" type="checkbox"/> No<br><br>Click or tap here to enter text. |
| 5 | Does the draft legal text satisfy the intent of the modification?                                | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No<br><br>Click or tap here to enter text.                                                                                               |
| 6 | Do you agree with the Workgroup's assessment that the modification does not                      | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No                                                                                                                                       |

## Public

|  |                                                                                                         |                                  |
|--|---------------------------------------------------------------------------------------------------------|----------------------------------|
|  | impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code? | Click or tap here to enter text. |
|--|---------------------------------------------------------------------------------------------------------|----------------------------------|

### Specific Workgroup Consultation questions

|   |                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                       |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7 | What submission mechanism (post offer negotiation or a formal modification application route) is most appropriate to process a Completion Date Delay Request for Users that have not accepted a Gate 2 Offer? | Negotiation post-offer issued but prior to acceptance should be the preferred mechanism to avoid delays and additional uncertainty and resources required for a further ModApp procedure at a later date.                                                                                             |
| 8 | Would you anticipate using the Connection Date Delay process to change your Gate 2 modification Offer?                                                                                                        | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No                                                                                                                                                                                                                                |
| 9 | If yes to question 8, for what reasons?                                                                                                                                                                       | The G2TWQ process to implement connections reform is taking approximately 3 years, and it introduced a new risk to developers that their existing grid connection agreements may be compromised by the readiness and strategic alignment requirements. Therefore, investment commitment may have been |

## Public

|    |                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                                                         | delayed pending completion of the G2TWQ process with consequential delays to the project delivery and, hence, required Connection Date.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 10 | Do you believe the legal text is sufficiently clear without requiring supporting information within the Gated Modification Guidance?                    | <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Clear guidance is essential to support the legal text, ideally using more understandable terms and language and examples. Given the complexity and linkages, it is especially critical that the Gated Modification Guidance clearly and explicitly explains how the Connection Date, User Progression Milestones (Appendix Q), Construction Programme (Appendix J) and cancellation liabilities/securities are, or are not, subject to mandatory or discretionary changes linked to NESO'S decision on a Connection Date Delay Request, or how they may be aligned by applying other procedures</p> |
| 11 | Would you propose any variations to the supporting information within the updated Gated Modification and Queue Management Guidance (see Annex 7 and 8)? | Given the complexity and linkages, it is critical that the Gated Modification Guidance and Queue Management Guidance clearly and explicitly explain how the Connection Date, User Progression Milestones (Appendix Q), Construction Programme (Appendix J) and cancellation liabilities/securities are, or are not, subject to mandatory or discretionary changes linked to NESO'S decision on a Connection Date Delay Request. The wording should be consistent so that there are no differences or conflicts leading to                                                                                                                                                                |

## Public

|    |                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                   |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                                                                                                                                                                 | misinterpretation when comparing the guidance in each document.                                                                                                                                                                                                                                   |
| 12 | Are there any ramifications from excluding DNO embedded projects that are not already catered for in the separate connections process?                                                                                                                          | No comment                                                                                                                                                                                                                                                                                        |
| 13 | If the NESO securities delay proposal were to be progressed could it potentially resolve the concerns in relation to your relevant projects, or do you feel that a date change mechanism proposed with CMP471 would be more useful in respect of your projects? | Date change mechanism proposed with CMP471 would be more useful because securities are a consequence of the Connection Date and should be re-aligned accordingly.                                                                                                                                 |
| 14 | The Original proposal includes 60 Business Days for NESO to respond to a Connection Date Delay Request. Do you believe this is: a) too long, b) about right, or                                                                                                 | <input checked="" type="checkbox"/> Too Long<br><input type="checkbox"/> About right<br><input type="checkbox"/> Too short<br><p>The allowed time for acceptance of a G2TWQ ModApp offer is 3 months (90 calendar days). The acceptance decision will depend on project delivery aligned with</p> |



## Public

|    |                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | c) too short – and why?                                                                                                                                                                                                                                                                                                     | the specified Connection Date, therefore the NESO decision on the Connection Date Delay Request needs to be at least 30 calendar days prior to the acceptance deadline (or allow for the deadline to be extended longer than 90 days to provide for this time).                                                                                                                                                            |
| 15 | In CUSC 18, there is currently no proposed legal text describing the interaction between a Gate 2 Modification Offer validity period (3 months) and a Connection Date Delay Request which is made within that period. Do you believe there should be explicit drafting on this topic, and what that relationship should be? | Yes, where a Connection Date Delay Request is submitted, the G2TWQ ModApp validity period should be extended to a minimum of 30 calendar days after the NESO decision on the request.                                                                                                                                                                                                                                      |
| 16 | Do you perceive any benefits or drawbacks to not including explicit provision for consequential updates to the Appendix J Construction programme in line with any delay to the                                                                                                                                              | Appendix J Construction Programme should be explicitly updated and re-aligned with the revised Connection Date. If not, the User and NESO will have the major drawback of needing to implement a second process via a Gated ModApp to make the changes to Appendix J, with the timing of the Gate unspecified and outcome not known. The means additional resources from both parties, and risk to the User if any item in |

## Public

|    |                                                                                                                                                                                                                     |                                                                                                         |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
|    | Completion Date arising from this mechanism?                                                                                                                                                                        | Appendix J cannot be re-aligned for whatsoever reason after the G2TWQ ModApp has already been accepted. |
| 17 | Do you perceive any interactions with commercial frameworks, such as Government's Contract for Difference (CfD) or Capacity Market (CM)?                                                                            | No comment                                                                                              |
| 18 | Do you agree that 20 Business Days after receipt of a relevant Offer, or 20 Business Days beginning 10 days following the Implementation Date is sufficient to submit the required Completion Date notices to NESO? | Yes                                                                                                     |