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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 cust.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 cust.team@neso.energy

Respondent details	Please enter your details	
Respondent name:	Martin Hardwick	
Company name:	Northern Powergrid	
Email address:	Martin.Hardwick@northernpowergrid.com	
Phone number:	07928 509475	
Which best describes your organisation?	☐ Consumer body ☐ Demand ☒ Distribution Network Operator ☐ Generator ☐ Industry body ☐ Interconnector	☐ Storage ☐ Supplier ☐ System Operator ☐ Transmission Owner ☐ Virtual Lead Party ☐ Other

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*)

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☐ **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.*

** 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;*

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- 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.*

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

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1	Do you believe that the Original Proposal better facilitates the Applicable Objectives versus the current baseline?	Mark the Objectives which you believe the Original Solution better facilitates than the current baseline: <table border="1"> <tr> <td data-bbox="608 501 863 613">Original</td><td data-bbox="863 501 1417 613"> ☒i ☒ii ☒iii ☒iv ☒v ☐None </td></tr> </table>	Original	☒ i ☒ ii ☒ iii ☒ iv ☒ v ☐ None
Original	☒ i ☒ ii ☒ iii ☒ iv ☒ v ☐ None			
		Overall Northern Powergrid believes that Original Proposal is likely to better facilitate the Applicable Code Objectives compared with the current baseline. We consider that in particular the proposal supports: - Objective (i), by supporting alignment of contractual arrangements with realistic delivery assumptions and reducing the need for subsequent variations. - Objective (ii), by reducing the risk of viable projects facing disproportionate liabilities arising from circumstances associated with the Connections Reform process rather than project performance. - Objective (iv), by improving administration of connection agreements and reducing avoidable modification activity following Gate 2 offer acceptance.		
2	Do you support the proposed implementation approach?	☒Yes ☐No Northern Powergrid supports the proposed implementation approach, which involves targeted modifications to Sections 11, 17 and 18 of the CUSC, as a temporary and targeted intervention framework. We agree with the Workgroup's view that this should be a time-limited measure designed specifically to address circumstances arising from the G2TWQ process, rather than establishing an enduring mechanism.		
3	Do you have any other comments?	Given the potential operational complexity, it is important that the process remains proportionate and that sufficient resources are available to assess applications without		

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		adversely affecting ongoing Connections Reform delivery activities. Northern Powergrid's support is contingent on appropriate safeguards being designed and implemented prior to the modification taking effect, ensuring that the volume of completion date delay requests does not create unintended impacts on network planning, construction sequencing, queue management, and particularly the delivery of the Joint Industry Plan. The term "Eligible User" though broadly understood does not appear to be clearly defined in the current drafting. Clarification/definition of the term would be helpful.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	☐ Yes (the request form can be found in the Workgroup Consultation Section) ☒ No
		Northern Powergrid does not wish to raise a formal Alternative at this stage.
5	Does the draft legal text satisfy the intent of the modification?	☒ Yes ☐ No
		Northern Powergrid believes that the draft legal text in Annex 4 CUSC Section 11, 17 and 18 does satisfy the overarching intent of the modification by creating a defined mechanism through which eligible users may request completion date delays during the G2TWQ transition period.
6	Do you agree with the Workgroup's assessment that the modification does not impact the	☒ Yes ☐ No

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	Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code?	Based on Northern Powergrid's review of the consultation material, CMP471 is concerned with connection agreement management and a temporary completion date variation process during Connections Reform. The proposal does not appear to affect balancing arrangements, balancing market participation, or EBR Article 18 terms and conditions. Accordingly, Northern Powergrid agrees with the Workgroup's assessment that the modification does not impact the EBR Article 18 terms and conditions held within the Code.
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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?	Given Northern Powergrid's role as a DNO and noting the Workgroup's conclusion that embedded distribution-connected projects are out of scope of CMP471 because alternative mechanisms already exist for updating relevant dates and managing associated liabilities, Northern Powergrid would support any process that is transparent, proportionate and applied consistently across Users, while minimising administrative burden and providing appropriate governance and certainty.
8	Would you anticipate using the Connection Date Delay process to change your Gate 2 modification Offer?	☐ Yes ☒ No Not applicable for Northern Powergrid as a DNO
9	If yes to question 8, for what reasons?	Not applicable
10	Do you believe the legal text is sufficiently clear without requiring	☒ Yes ☐ No

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	supporting information within the Gated Modification Guidance?	Northern Powergrid does not anticipate using the Connection Date Delay process directly, as the modification is solely targeted at Users receiving Gate 2 Modification Offers. As set out in our response to Question 5, we consider that the proposed legal text changes within Annex 4 and CUSC Sections 11, 17 and 18 are sufficient to achieve the intent of the modification. Given that CMP471 is intended to be a temporary arrangement. As such, Northern Powergrid has no further comments on the proposed process
11	Would you propose any variations to the supporting information within the updated Gated Modification and Queue Management Guidance (see Annex 7 and 8)?	Northern Powergrid does not have any additional amendments or enhancements to propose at this stage. However, we would support any future updates that may be required to maintain consistency with the final approved legal text and associated implementation arrangements.
12	Are there any ramifications from excluding DNO embedded projects that are not already catered for in the separate connections process?	Northern Powergrid has not identified any significant ramifications arising from the exclusion of DNO embedded projects.
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?	Northern Powergrid is responding in its capacity as a Distribution Network Operator (DNO). As DNO embedded projects are considered out of scope of CMP471 and are subject to separate connection and contractual arrangements, we do not consider the proposed NESO securities delay proposal or the CMP471 date change mechanism to be relevant to Northern Powergrid or our customers.

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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 c) too short – and why?	☐ Too Long ☒ About right ☐ Too short Northern Powergrid believes that the response period should be as long as reasonably required without undermining the objective of the modification, namely allowing customers to re-baseline costs, liabilities and associated contractual milestones ahead of the 1 April liability trigger date. Provided that the objective can still be achieved, allowing adequate assessment time will support more robust decision-making and reduce the risk of unintended impacts on wider network planning and delivery activities.
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?	Northern Powergrid believes there should be explicit drafting within CUSC 18 setting out the interaction between the Gate 2 Modification Offer validity period and a Connection Date Delay Request submitted during that period. The more clarity provided in the legal text, the better, particularly given the temporary nature of the process and the potential commercial implications for users. The drafting should clearly confirm: • Whether submission of a Connection Date Delay Request pauses, extends or otherwise affects the three-month Gate 2 Offer validity period. • Whether a user is required to accept the original Gate 2 Offer before a delay request can be considered. • The status of the Gate 2 Offer while the delay request is under assessment. • The commercial implications of requesting a change to an agreement that has not yet been accepted, including any impact on liabilities, securities, milestone obligations and offer acceptance rights. On the basis that this temporary process is only for CMP435 projects, Northern Powergrid believes that all eligible projects would fall under the definition of "Projects

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		with Existing Agreements” in which case all the provisions should belong in CUSC 18
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 Completion Date arising from this mechanism?	Northern Powergrid perceives potential drawbacks to not including explicit provision for consequential updates to the Appendix J Construction Programme where a Completion Date is amended through this mechanism. Where a Completion Date Delay Request is approved, there is a risk that the contractual Completion Date and the Appendix J Construction Programme could become misaligned if consequential updates are not made. This may create uncertainty regarding delivery expectations, project milestones and programme obligations for customers and NESO.
17	Do you perceive any interactions with commercial frameworks, such as Government’s Contract for Difference (CfD) or Capacity Market (CM)?	No. Northern Powergrid does not currently perceive any material interactions between CMP471 and commercial frameworks such as the Contract for Difference (CfD) or Capacity Market (CM). CMP471 is a temporary process intended to allow eligible users to request a delay to their contracted Completion Date during the G2TWQ process. The modification primarily concerns connection agreement administration and contractual alignment rather than changes to the underlying commercial framework requirements or qualification processes associated with CfD or CM schemes.
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. Northern Powergrid considers that 20 Business Days is sufficient and provides customers with adequate time to assess their position, engage with relevant stakeholders and submit the required notices. Given that CMP471 is intended to be a targeted, temporary process, we believe a longer submission window is unlikely to deliver significant additional benefits and could potentially delay the efficient administration of requests. The proposed timescales appear proportionate and should allow eligible Users a reasonable opportunity to determine whether they wish to seek a Completion Date delay.