

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

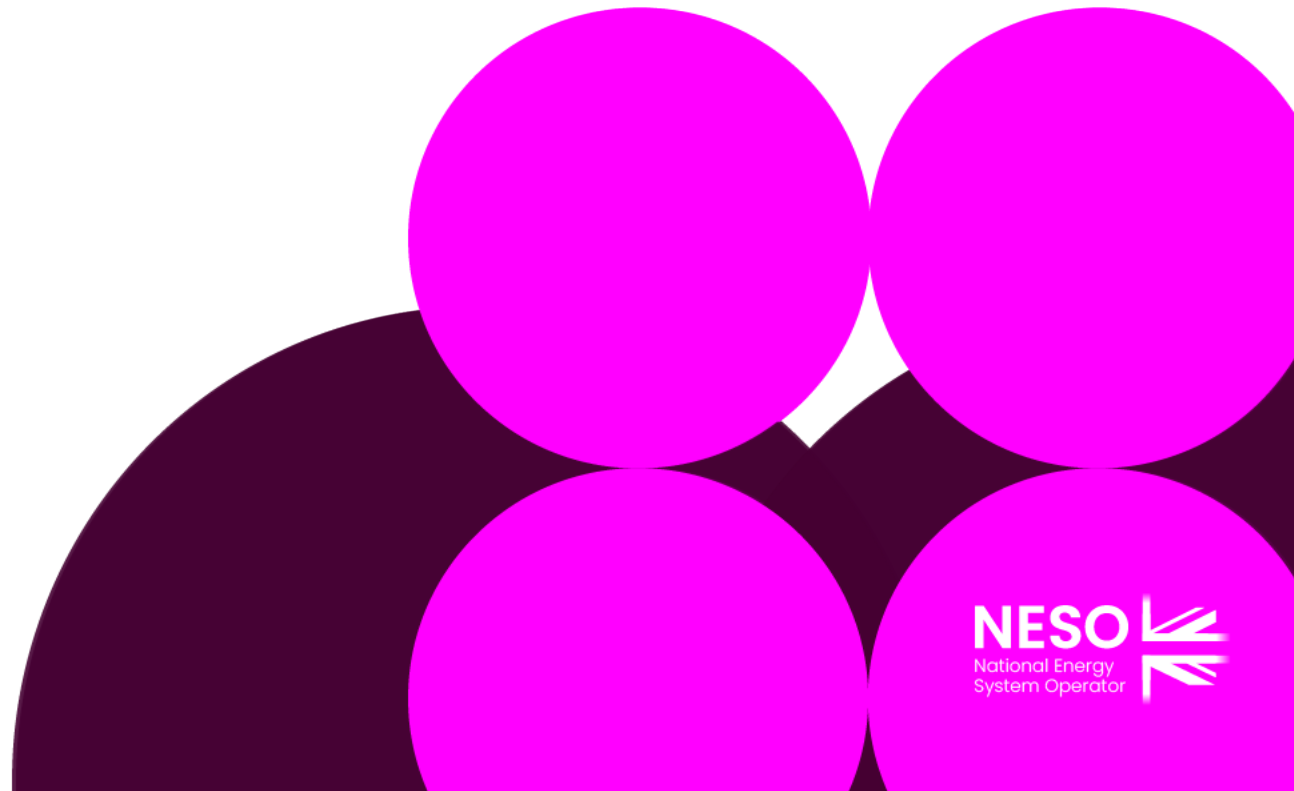
Workgroup Number 7 – 30 July 2026

Online Meeting via Teams

WELCOME

Ofgem Slot

Ofgem



Agenda

Topics to be discussed	Lead
Welcome	Chair
Ofgem Slot	Ofgem
Objectives and Timeline • Walk-through of the timeline for the modification	Chair
Workgroup Consultation Responses	Chair
Outstanding Actions	Chair
Any Other Business	Chair
Next Steps	Chair

Expectations of a Workgroup Member

Contribute to the discussion

Be respectful of each other's opinions

Language and Conduct to be consistent with the values of equality and diversity

Do not share commercially sensitive information

Be prepared – Review Papers and Reports ahead of meetings

Complete actions in a timely manner

Keep to agreed scope

Email communications to/cc'ing the .box email

Your Roles

Help refine/develop the solution(s)

Bring forward alternatives as early as possible

Vote on whether or not to proceed with requests for Alternatives

Vote on whether the solution(s) better facilitate the Code Objectives

CMP471 – Proposed Timeline Update (17 July)

Milestone	Date	Milestone	Date
Modification presented to Panel	15 May 2026	Code Administrator Consultation (10 Business Days)	02 September – 08 September 2026
Workgroup Nominations	15 May 2026 – 19 May 2026 (Extended until 03 June 2026)	Draft Final Modification Report (DFMR) issued to Panel (2 Business Days)	15 Sept 2026
(Full Day Meetings) Workgroup 1 Workgroup 2 Workgroup 3 Workgroup 4 Workgroup 5 Workgroup 6	11 June 2026 15 June 2026 17 June 2026 24 June 2026 30 June 2026 15 July 2026	Panel undertake DFMR recommendation vote	18 Sept 2026 (Special Panel)
Workgroup Consultation	17 July 2026 – 24 July 2026	Final Modification Report issued to Panel to check votes recorded correctly	18 Sept 2026 (Special Panel)
(Full Day Meetings) Workgroup 7 Workgroup 8 Workgroup 9 Workgroup 10	30 July 2026 05 Aug 2026 10 Aug 2026 13 Aug 2026 (Place holder to finalise Workgroup Report)	Final Modification Report issued to Ofgem	18 Sept 2026
Workgroup report issued to Panel	25 Aug 2026	Ofgem decision	TBC
Panel sign off that Workgroup Report has met its Terms of Reference	28 Aug 2026	Implementation Date	TBC (End September)

Workgroup Membership

Role	Name	Company
Proposer	Matthew Dowds	Muir Hall Energy
NESO Rep	Terry Baldwin	NESO
Workgroup Member	Andrew Allan	RWE
Workgroup Member	Ciaran Fitzgerald	Scottish Power Renewables
Workgroup Member	Cat Glennie	SP Manweb Plc
Workgroup Member	Gareth Williams	Scottish Power Transmission
Workgroup Member	Garth Graham	SSE Generation
Workgroup Member	Henry McDonald	Voltwise Power
Workgroup Member	Joe Colebrook	Innova
Workgroup Member	Kirsty Dawson	Statkraft.com
Workgroup Member	Lamin Saidy Vulart	Qair UK
Workgroup Member	Martin Hardwick	Northern Powergrid
Workgroup Member	Mark O'Connor	EDF ENERGY RENEWABLES LIMITED
Workgroup Member	Alastair Southworth	Harmony Energy

Workgroup Membership

Role	Name	Company
Workgroup Member	Sam Aitchinson	Island Green Power
Workgroup Member	Isabelle Eleanor Vasko	NGET
Workgroup Member	Harriet Eckweiler	SSE Transmission
Workgroup Member	Rob Smith	Enso Green Holdings Ltd (EGHL)
Workgroup Member	Niall Stuart	Hutcheson Associates
Observer	Ben Clarke	Bute Energy Ltd
Observer	David Barber	GridLink Interconnector Ltd
Observer	Dimitrios Terzis	SSEN Transmission
Observer	Mithun Suresh	Masdar
Observer	Patrick O'Mahony	Perigus Energy
Observer	Toby Evans	Atlantic Green
Observer	Fiona Ewart	Scottish Power Transmmission
Authority Representative	Shalema Bhanu	Ofgem
Authority Representative	Kingsley Emeana	Ofgem

Terms of Reference

Workgroup Term of Reference

1. Consider EBR implications
2. Consider a solution that provides both a short term solution for applications within the Gate 2 to Whole Queue (G2TWQ) process i.e. CMP435 and allows for non-gated applications to delay connection dates as part of the enduring (CMP434) connections process
3. Consider if there should be a limit on who can take advantage of a non-gated modification to delay connection dates. E.g. limit based on existing connection date
4. Consider the need for revised network studies within the solution

Workgroup Consultation Responses

Robert Hughes – NESO Code Administrator

CMP471 Workgroup Consultation Responses Review

Number of Responses/Alternatives	
Confidential Responses	0
Non-Confidential Responses	15
Alternative Requests Raised	0

Industry Sector Representation*	
Consumer body	0
Demand	1
Distribution Network Operator	1
Generator	8
Industry body	0
Interconnector	1
Storage	4
Supplier	1
System Operator	1
Transmission Owner	3
Virtual Lead Party	1
Other	0

*Please note some responses represent a number of industry sectors and this tally does not include confidential Respondents

CMP471 Workgroup Consultation Responses Review

Question	Number of Respondents			
	Objectives	Yes	No	N/A or No response
Do you believe that the Original Proposal better facilitates the Applicable Objectives?	i	10		
	ii	10		
	iii	2		
	iv	10		
	v	3		
	None	4		
Do you support the proposed implementation approach?		11	4	
Does the draft legal text satisfy the intent of the modification?		9	5	1
Do you agree with the Workgroup's assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code?		15		

No respondents raised Workgroup Alternative Requests during the Workgroup Consultation. However, SSEN Transmission and SP Transmission suggested alternatives. TOs are not permitted to raise workgroup alternatives under the CUSC modification process.

CMP471 Specific Workgroup Consultation Responses Review

Q7 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?

Responses show a **clear preference for a post-offer negotiation / direct request route** rather than a formal modification application.

- **9** respondents supported this approach, compared with 4 respondents who preferred a formal modification application route.
- Reasons for this included:
 - Efficiency and reduced administrative burden – avoids unnecessary cost, complexity and delay from requiring a formal modification application.
 - Flexibility before offer acceptance – allows completion dates to be amended before the contractual position has crystallised.
 - Avoiding unrealistic commitments – prevents Users having to accept a Gate 2 Offer they may not be able to meet simply to preserve queue position.
 - Earlier pragmatic engagement – supports direct discussion with NESO/TOs to resolve issues before offers are accepted.
 - Proportionate scope – viewed as appropriate where the request is limited to deferring the Completion Date and does not increase capacity or materially impact other Users.

CMP471 Specific Workgroup Consultation Responses Review

Q8/9 Would you anticipate using the Connection Date Delay process to change your Gate 2 modification Offer?

- **9 respondents** answered “Yes” to this question
- Reasons given included:
 - Managing delays caused by connections reform – respondents noted that the length and uncertainty of the CMP435/Gate 2 process has delayed project development and reduced confidence in existing connection dates.
 - Aligning contractual dates with realistic delivery programmes – the process would help update Completion Dates where current timelines no longer reflect achievable project delivery assumptions.
 - Addressing project dependencies and constraints – including planning consent, land rights, Point of Connection changes, procurement, long-lead equipment, financing, supply chain and network delivery dependencies.
 - Reducing commercial and administrative risk – respondents highlighted the need to avoid disproportionate liabilities, securities exposure, unnecessary future variations and investment uncertainty where projects remain viable but require more time.

CMP471 Specific Workgroup Consultation Responses Review

Q10 Do you believe the legal text is sufficiently clear without requiring supporting information within the Gated Modification Guidance?

- **7 respondents** answered “No” to this question
- Issues raised include:
 - Need for supporting guidance – respondents felt the legal text is not sufficiently clear on its own and should be supplemented by the Gated Modification Guidance.
 - Clarity on process and eligibility – further detail is needed on what the process constitutes, who is eligible, submission requirements, evidence requirements and assessment criteria.
 - Treatment of related contractual areas – respondents asked for guidance on how Completion Dates interact with User Progression Milestones, Construction Programmes, cancellation liabilities, securities and embedded projects.
 - Consistency and transparency of assessment – guidance should explain how NESO and Transmission Owners will assess requests, when requests may be refused, and how decisions will be communicated.
 - Offer validity and timing – respondents raised questions around offer acceptance, validity periods, submission windows and how unaccepted Gate 2 Offers will be treated during assessment.
 - Risk of inconsistent application – without clear guidance, respondents considered there is a risk of misunderstanding, inconsistent expectations and Users making mistakes that could affect project delivery.

CMP471 Workgroup Consultation Responses Review

Q11 Would you propose any variations to the supporting information within the updated Gated Modification and Queue Management Guidance (see Annex 7 and 8)?

- Around **70%** of respondents replied “Yes” to this question
- Responses included:
 - Clearer evidence and submission requirements for Completion Date Delay Requests, including revised dates, rationale, delivery assumptions and known impacts
 - More detail on assessment and decision-making, including NESO/TO roles, refusal grounds, network impact limits and how alternative dates would be identified.
 - Clarification of timing interactions, particularly between the CDDR process, Gate 2 Offer validity and the three-month offer acceptance deadline.
 - Explanation of consequential contractual impacts, including User Progression Milestones, Appendix J Construction Programmes, liabilities, securities and capital contribution/payment profiles.
 - Worked examples and embedded project treatment, including how embedded projects receive equivalent rights and outcomes.
 - Improved consistency across guidance documents, to ensure the Gated Modification Guidance and Queue Management Guidance align with the final legal text and avoid misinterpretation.

CMP471 Workgroup Consultation Responses Review

Q12 Are there any ramifications from excluding DNO embedded projects that are not already catered for in the separate connections process?

Around **25 %** of respondents replied “Yes” to this question

Responses included:

- Risk of unfairness and legal challenge if DNO embedded projects are not given equivalent rights and protections to transmission-connected projects.
- Concern that exclusion has not been fully assessed, with some respondents noting the issue had not been sufficiently discussed by the Workgroup.
- Need to demonstrate equivalent alternative processes, including legal rights, transparency, certainty, response obligations and commercial outcomes.
- Potential need for a similar process for some DNO contracts, particularly where delays affect transmission works or require a modification application.
- Risk of inconsistency between project categories, especially where embedded projects affect transmission planning, reinforcement requirements, outage planning or the contracted background.

CMP471 Workgroup Consultation Responses Review

Q13 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?

- **Around 70% of respondents** indicated that CMP471 would be more useful or would still be needed alongside the NESO securities delay proposal.
- Responses included:
 - NESO's securities delay proposal may provide short-term financial relief, but it only addresses securities exposure rather than the underlying Completion Date issue.
 - CMP471 was seen as more directly targeted, as it would realign contractual Completion Dates with realistic project delivery programmes.
 - Several respondents supported both mechanisms operating in parallel, with securities delay providing flexibility and CMP471 providing longer-term certainty.
 - A date change mechanism was considered necessary where delays arise from wider factors, including TO delays, planning delays, enabling works, outage constraints and supply chain issues.
 - Some respondents noted the NESO proposal would only apply to a narrow subset of projects, so would not resolve concerns across broader development portfolios or embedded projects.

CMP471 Workgroup Consultation Responses Review

Q14 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?

Around 50% of respondents said 60 Business Days was “about right” for NESO to respond to a Connection Date Delay Request.

Responses included:

- Sufficient time for assessment, particularly where requests involve network impacts, shared infrastructure, outage planning, commissioning sequencing or reinforcement interactions.
- Need for flexibility depending on request complexity, with shorter response times encouraged for straightforward or low-impact requests.
- Timing should not undermine commercial certainty, particularly where customers need decisions before offer acceptance deadlines or liability trigger dates.
- Clearer process controls were requested, including acknowledgements, progress updates, escalation routes and guidance on whether other Gate 2 offer issues can be negotiated in parallel.
- Some respondents considered 60 Business Days too long, arguing that limited date-only changes should be achievable more quickly and better aligned with offer acceptance periods.
- Others considered it too short, citing resource constraints, expected request volumes, TO assessment requirements and the risk of impacting wider connections reform delivery.

CMP471 Workgroup Consultation Responses Review

Q15 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?

Around **90%** of respondents replied “Yes” to this question.

Responses included:

- Explicit drafting is needed to clarify whether the Gate 2 Offer validity period is paused, extended or refreshed when a Connection Date Delay Request is submitted.
- Users should not be forced to accept an unrealistic Gate 2 Offer or risk reverting to Gate 1 while a delay request is still being assessed.
- The offer validity period should be extended or preserved until after NESO’s decision, with some respondents suggesting at least 30 calendar days after the decision for Users to consider the outcome.
- Revised offers should have clear acceptance arrangements, including whether they are treated as new offers or amendments and how long Users have to accept them.
- Interactions with TOCO, STC/STCP processes and wider Gate 2 activities should also be addressed, as changes to offer validity could affect Transmission Owner processes and future application windows.

CMP471 Workgroup Consultation Responses Review

Q16 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?

- Approx **86%** of respondents perceived there would be drawbacks to the above.
- Responses included:
 - Creates misalignment between the contractual Completion Date and the agreed construction programme.
 - Increases uncertainty for developers, TOs and NESO around milestones, obligations and delivery expectations.
 - May require a separate modification process to update Appendix J, creating additional administrative burden and delay.
 - Raises the risk of disputes, inconsistencies and project delivery issues if construction activities are not re-aligned with revised dates.
 - One response considered that no material benefits or drawbacks arise from omitting explicit provision, as existing and future offer processes can already refresh Appendix J where required.

CMP471 Workgroup Consultation Responses Review

Q17 Do you perceive any interactions with commercial frameworks, such as Government's Contract for Difference (CfD) or Capacity Market (CM)?

- Approx **86%** of respondents perceived interactions with commercial frameworks.
- Responses included:
 - Several respondents identified potential impacts on CfD and Capacity Market eligibility, particularly where delayed connection dates fall outside delivery windows or milestone requirements.
 - Respondents highlighted that Completion Date changes may need to be communicated to LCCC and could introduce additional considerations for CfD contract management.
 - A recurring concern was the interaction with CfD AR8 and Gate 2 offer timing, including possible implications from delays to the Joint Industry Plan.
 - Some respondents noted that distinguishing delays caused by NESO, TOs or Connections Reform from project-led delays could help developers evidence that delays were outside their control.

CMP471 Workgroup Consultation Responses Review

Q18 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?

- **92%** of respondents replied “Yes” to this question
- Responses included:
 - The vast majority of respondents agreed that 20 Business Days provides sufficient time to assess positions, engage stakeholders and submit Completion Date notices.
 - Several respondents supported the timescale but noted that larger or more complex projects may require flexibility where extensive internal governance and multiple stakeholders are involved.
 - Respondents emphasised the need for clear guidance, standardised forms and an efficient submission process to ensure the proposed window is workable in practice.
 - One response disagreed, arguing that implementing the process now could divert resources from ongoing Gate 2 offer delivery and should instead be considered after Phase 2 activities are complete.

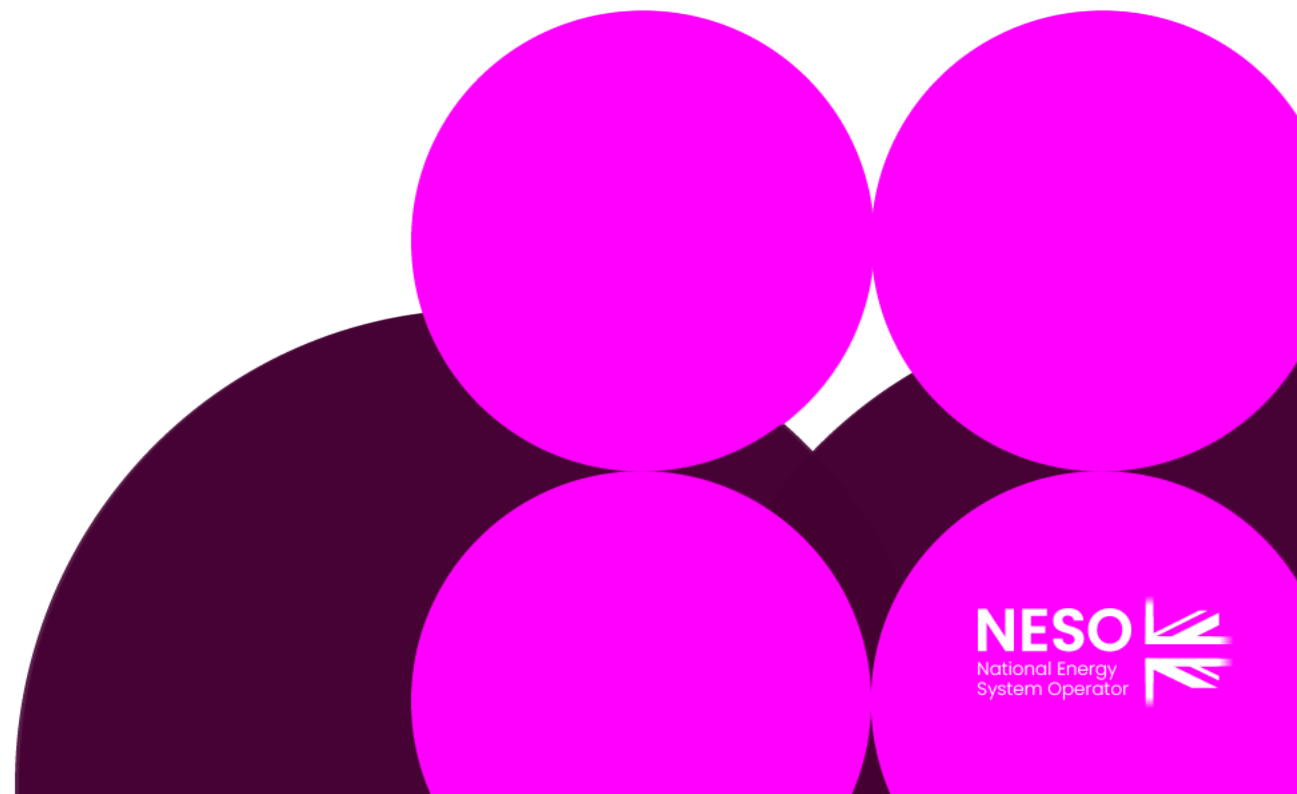
CMP471 Workgroup Consultation Responses Review

Overall, respondents broadly support CMP471 as a temporary, targeted mechanism to help Users manage completion date delays arising from G2TWQ and connections reform, **with 11 respondents supporting** the proposed implementation approach and **4 not supporting it**. However, support is generally conditional on clearer legal drafting, guidance and process safeguards.

- Process views are mixed, with several respondents favouring direct/post-offer engagement to avoid unnecessary modification applications, while NESO and some Transmission Owners prefer a formal route for governance, consistency and auditability.
- Legal text and guidance need further clarity, especially on eligibility, evidence requirements, refusal reasons, escalation routes, offer validity, TOCO validity, securities, liabilities and interaction with Gate 2 acceptance periods.
- Support centres on protecting Users from delays outside their control, particularly where existing Completion Dates, securities, liabilities and project milestones no longer reflect realistic delivery assumptions.
- A strong recurring theme is that approved delays should trigger consequential updates, including Appendix J Construction Programmes, User Progression Milestones, securities, liabilities and related contractual schedules, to avoid misalignment and further modification processes.
- Wider impacts need to be acknowledged, including potential effects on the Joint Industry Plan, Phase 2 delivery, DNO/embedded projects, CfD, Capacity Market, financing and investment decisions.

Actions Review

Robert Hughes – NESO Code Administrator



Actions Review

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
5	WG1	TOs	TOs to provide a qualitative impact assessment to help the workgroup understand how this modification could impact the Joint Industry Plan (JIP) AKA Existing Agreement Timeline	Ongoing	WG2	Open
6	WG2	RM	Confirm – What ability do NESO have to ensure TOs are aligning connection dates and to change the earliest customer connection dates in Scheme Briefing Notes (SBN) after a TO has issued a TOCO to NESO.	Ongoing	WG3	Open
9	WG2	Ofgem	Ofgem to consider whether changes or clarification to licence conditions are required to enable connection date delays without requiring a full modification application, or to avoid penalising TOs for accommodating such delays.	Ongoing	WG3	Open
11	WG2	MD	A summary slide or section that brings together all relevant inputs and references, including NESO guidance and relevant CUSC provisions (e.g. milestones, exceptions processes), to show how they interact with the CMP471 proposal. To improve clarity and traceability across: NESO guidance (e.g. milestone extensions due to reform delays) Existing CUSC provisions (e.g. Section 16.5 exceptions) The proposed CMP471 legal text To help the workgroup understand how the different mechanisms work together in practice	Ongoing	WG3	Open

Actions Review

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
12	WG2	RM	Confirm whether it is preferable (and feasible) for connection date delay requests and associated milestone/exception requests to be handled together as a single process, or continue being managed separately across different NESO teams. Workgroup it was highlighted that: Connection date delay requests go through one route (applications → TOs → contracts) Milestone exceptions (e.g. QM milestones) are handled by a different team/process There was concern this could create: Inefficiency Misalignment if requests are assessed separately	Ongoing	WG3	Open
15	WG3	TP/RB/RM	Set up cross party alignment session (Ofgem / TOs / NESO) • Formal action to bring parties together to align interpretation of: - o CUSC and Licence interpretation - o Connection date flexibility - o Process approach		WG4	Closed
17	WG3	TP	Follow-up session with proposer and NESO to review legal text and Gated Modification Guidance updates.	Ongoing	WG4	Open
18	WG3	RM	As a follow up to Action 10 – RM to confirm potential options/changes to current position (Changes can only be made once the connection offer is signed.)	Ongoing	WG4	Open

Actions Review

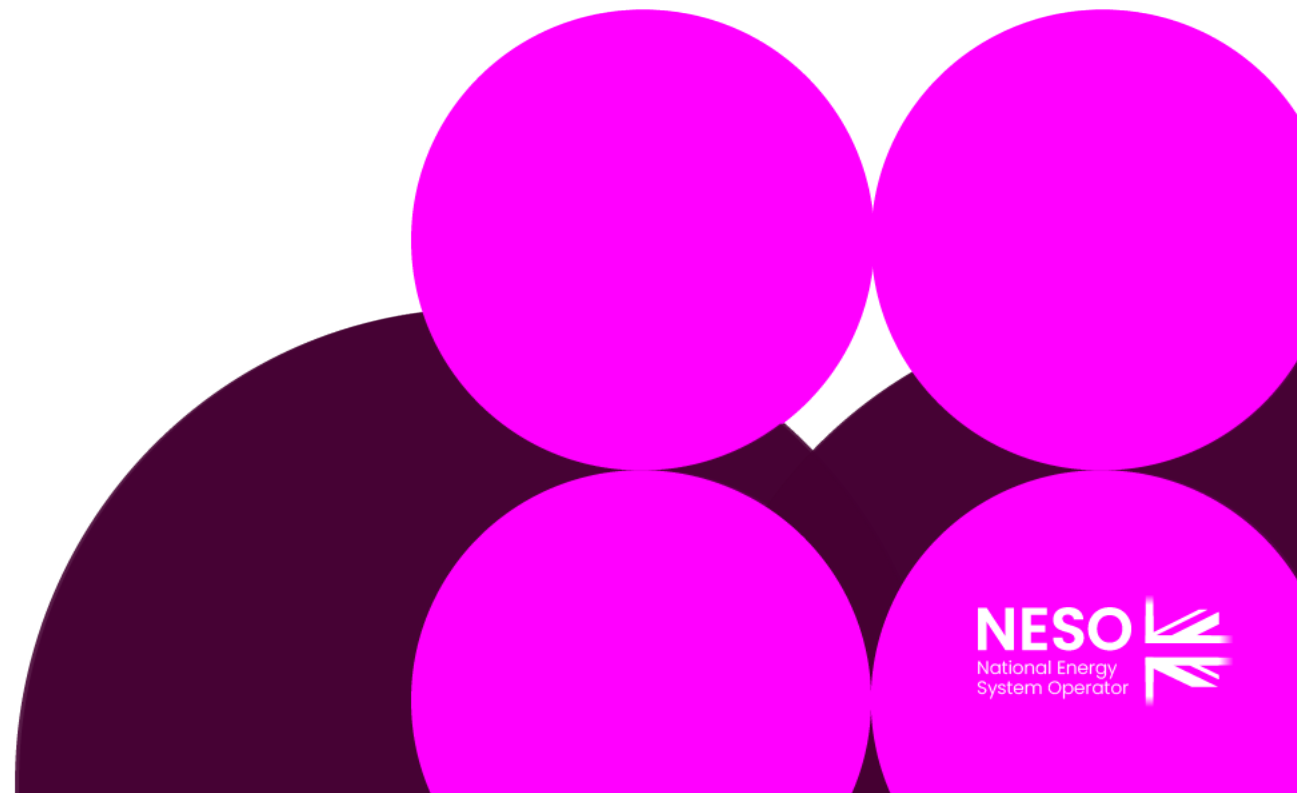
Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
19	WG4	TB	Mod App Change – TB to seek clarification from NESO on specific points raised about the scoping exercise—particularly: The intent and implications of the exercise, Ambiguity around whether participation is effectively required, How it interacts with (or differs from) CMP471 activities.		WG5	Open
20	WG4	MD/TOs	Consider and feedback to Workgroup - process consideration regarding impacts on Transmission Owners (TOs). WG highlighted that: Where a host TO processes connection date changes, this could affect other (affected) TOs. Changes in programme, scope, or timing could require: The affected TO to update their own offers, and Additional coordination between TOs.		WG5	Open
21	WG4	RW	Consider - minimum set of objective criteria to prevent non-viable requests progressing through the process. RW to take away and develop a set of “showstopper” / entry criteria from a TO perspective (i.e. situations where a connection date delay request should not proceed), and Bring these back to the Workgroup to test and refine.		WG5	Open

Actions Review

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
22	WG4	TB/RW	Operational impact on NESO. Consider how NESO would practically manage the process being proposed – particularly the coordination between NESO and TOs when: Assessing delay requests, and Managing any “in-between” scenarios where a request cannot be fully accommodated.		WG5	Open
23	WG4	TB/RW	NESO to review and confirm how the “application of the User Commitment Methodology” interacts with the securities freeze, including: Whether updated costs/contract positions would be reflected immediately, and Whether securities (e.g. cancellation charge secured amounts) would actually be reissued or remain frozen.		WG5	Open
24	WG4	MD/TB/RW	Transitional Offers – Action on MD: to consider whether and how transitional offers should be included within scope, taking into account feasibility and impacts. Action on NESO: to clarify how transitional offers are currently treated within the gated process, which will inform whether they should be included in CMP471.		WG5	Open

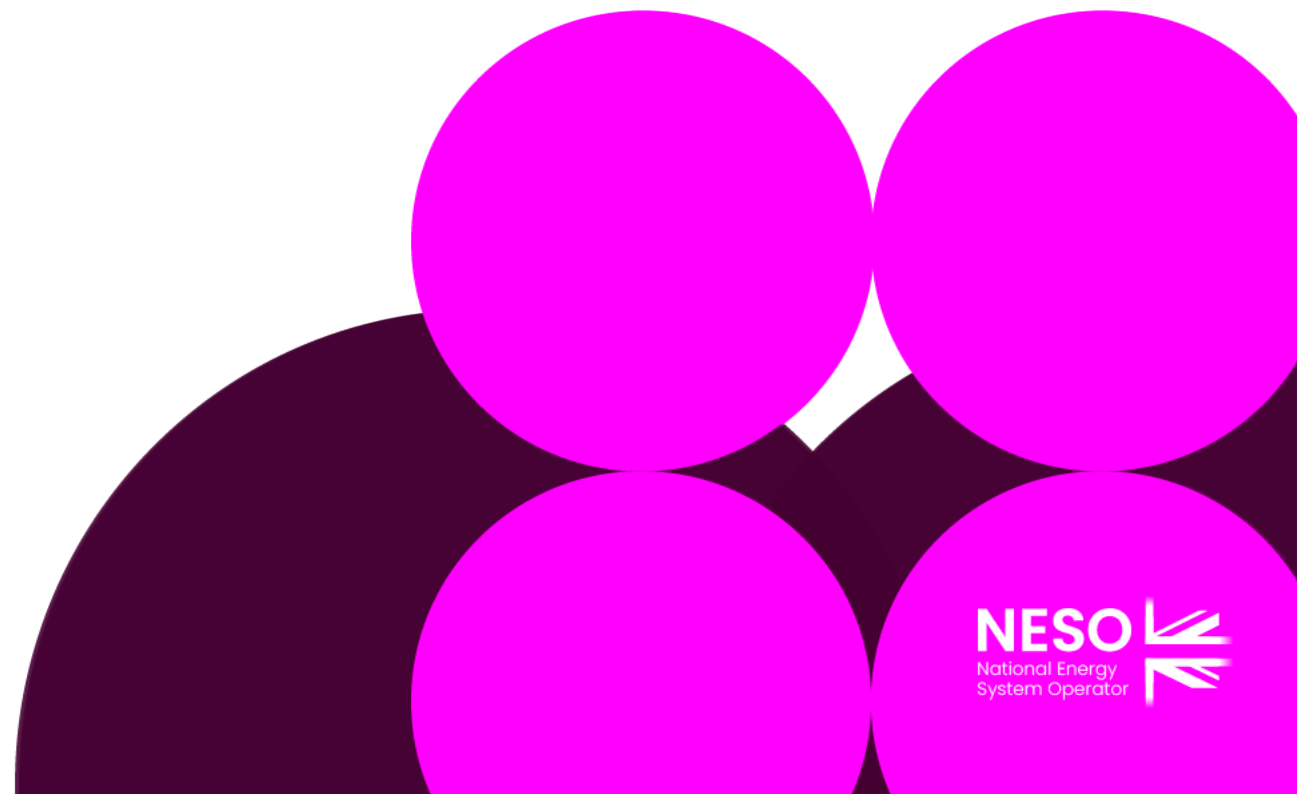
Any Other Business

Robert Hughes – NESO Code Administrator



Discussion Request – Hutcheson Associates

Niall Stuart



Discussion Request

The workgroup consultation makes it clear that the proposal is designed to address challenges for projects from TO driven delays so I think it is vital we get a definitive sense of how these should be managed.

Four scenarios we need to understand around delays to TO programme:

1. Gate 2 offer yet to be issued
2. Gate 2 offer issued and not yet signed
3. Gate 2 offer signed but not yet countersigned
4. Gate 2 offer signed and countersigned

Next Steps

Robert Hughes – NESO Code Administrator

