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Code Administrator Meeting Summary

Workgroup Meeting 9 – CMP471: Interim Connection Date Delay Process Ahead of CMP434 Gated Application Window

Date: 10/08/2026

Contact Details

Chair: Robert Hughes, Robert.Hughes3@neso.energy

Proposer: Matthew Dowds, matthew.dowds@muirhallenergy.co.uk

Key areas of discussion

The meeting focused on CMP471's proposed interim Connection Date Delay Request process ahead of the first CMP434 Gated Application Window, three Alternative Requests raised, and the legal text needed to support the process.

Ofgem Slot

As agreed in CMP471 Workgroup 7, future meetings will include a dedicated Ofgem slot to allow Workgroup Members to raise questions. Ofgem did not attend Workgroup 9.

Alternative Request 01 – GridLink

Alternative Request 01 proposed that, where NESO accepts a Connection Date Delay Request, all User Progression Milestones M1 to M8 in Appendix Q of the Construction Agreement should be automatically recalculated using the applicable CUSC Section 16 formula by reference to the new delayed Connection Date. This would replace the Original Proposal's discretionary approach, under which NESO may change milestones only for allowable delays associated with Connections Reform.

The Proposer of the Alternative Request explained that the change was intended to provide a clearer link between the approved revised connection date and the user progression milestones. The Proposer of the Alternative Request considered that, where the connection date is delayed, retaining the existing milestone dates could require users to meet planning, development consent, financial investment decision or contract award milestones earlier than would be practical or appropriate for the revised project timetable.

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The Proposer of the Alternative Request also said the Alternative Request would avoid users having to submit separate exceptions requests after CMP471 to realign their milestones. In their view, this would reduce duplication and uncertainty for users, NESO and Transmission Owners. The Proposer considered that the risk of users gaming the process was limited, because Gate 2 offers would already have assessed whether projects met the relevant strategic alignment and readiness criteria.

Workgroup Members discussed whether this would require only a targeted wording change or broader legal drafting to ensure the relevant milestones are recalculated against the new connection date.

Workgroup Members discussed how the Alternative Request would interact with existing queue management arrangements. One Workgroup Member noted that a user may previously have delayed its connection date without its milestones moving, because the delay was user-requested. In that context, the Workgroup considered whether automatic milestone realignment under CMP471 could create an additional benefit, or whether it should be seen as a fresh alignment of milestones following Gate 2.

Workgroup Members also queried whether milestone realignment was within the scope of CMP471. The Chair confirmed that NESO legal team was reviewing whether Alternative Request 01, and similar issues raised under Alternative Request 03, were within scope.

The NESO representative explained that NESO did not support the Alternative Request. They said that queue management milestones were introduced to keep projects on track with their connection dates, and that NESO had already introduced an exceptions process to help mitigate some Gate 2 to Whole Queue delays. The Proposer of the Alternative Request disagreed that the existing user-requested delay principle should apply in the same way following connections reform, arguing that the delay addressed by CMP471 arises from the Gate 2 to Whole Queue process rather than from the user.

The Workgroup also discussed whether the Alternative Request would apply retrospectively. A Workgroup Member asked whether the proposal would apply to milestones that had already passed by the time Ofgem made a decision. The Proposer of the Alternative Request clarified that retrospective application was not intended and that the Alternative Request was focused on users receiving Gate 2 offers, rather than reopening milestones that had already passed.

Alternative Request 02 – Aukera

Alternative Request 02 proposed retaining the Original Proposal's limited, time-bound Connection Date Delay Request process but restricting eligibility. NESO would only accept a request for consideration where the user can evidence that project delivery has been delayed by one or more exceptional issues outside the user's control, using CUSC Section 16.5 and relevant queue management guidance as the reference point.

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The Proposer of the Alternative Request explained that the alternative responded to concerns raised by Transmission Owners and NESO during the Workgroup consultation. These concerns included the risk that an open-ended request process could undermine the TMO4+ principle that ready and aligned projects should connect first, place additional pressure on NESO and Transmission Owners during CMP435, affect the first CMP434 window, and require re-working of network design assumptions developed through Gate 2 to Whole Queue.

The Proposer recognised that some projects may still require flexibility where delays arise from matters outside their control, such as a Gate 2 offer with a different point of connection from the existing agreement, planning appeals, or third-party challenges to consents. They described the approach as a backstop or de minimis option, intended to preserve a route for projects with legitimate exceptional circumstances while reducing the risk and resource impacts associated with a broader process.

Workgroup Members discussed how the CUSC Section 16.5 criteria would apply in practice and whether the Alternative Request should also refer to associated queue management guidance. One Workgroup Member noted that the guidance includes a Gate 2 to Whole Queue exceptional issue and suggested that both the CUSC provisions and the guidance should be referenced.

Workgroup Members raised questions about the evidence threshold that would need to be met before NESO would accept or progress a Connection Date Delay Request. A Workgroup Member noted that CUSC Section 16.5 may be relatively untested in this context and that, without clearer guidance on what evidence would be acceptable, it could be difficult to assess whether the Alternative Request would be workable. The Proposer of the Alternative Request agreed to take this point away and discuss with NESO what evidence would be considered reasonable.

A NESO representative confirmed that NESO would need to consider internally what evidence would be acceptable under CUSC Section 16.5 and the associated guidance. The Chair summarised that the proposer of the Alternative Request would take away the Workgroup's comments and bring back a revised version for further consideration, including clearer links to the relevant guidance and a clearer explanation of the proposed evidence requirements.

Alternative Request 03 – Enso Energy

Alternative Request 03 proposed retaining the Original Proposal but adding a capped mechanism for Queue Management milestone delays where a Connection Date Delay Request is granted. The user could apply to NESO to delay Queue Management milestones M1, M2, M5, M6, M7 and M8, and NESO would be obliged to grant the request where it met the proposed methodology. The delay would be capped at the lesser of 18 months or the milestone dates calculated using the revised connection date and the CUSC Section 16 queue management look-up date methodology.

The Proposer of the Alternative Request explained that the proposal was intended to provide additional certainty for users affected by connection uncertainty, while avoiding a fully open-

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ended milestone extension process. They said the 18-month cap reflected the period between the revised connection methodology being introduced in April 2025 and the expected issue of Gate 2 Phase 1 offers by the end of September 2026. The Workgroup agreed that a reference to September 2027 in the Alternative Request was a typo and should read September 2026.

The Proposer said that projects may not have been able to progress at the same pace while connection date, point of connection and cost positions remained uncertain. In particular, debt and equity investment, long-lead asset procurement and Engineering, Procurement and Construction contracting may have been constrained until Gate 2 offers confirmed the relevant project parameters. The Proposer considered that the capped delay mechanism would support more efficient capital deployment while limiting the potential for gaming.

The Proposer confirmed that users would not be required to delay their milestones automatically; instead, users would have flexibility to apply for the level of delay they required, up to the permitted limit. The application would need to be made after the Connection Date Delay Request process, following receipt of the revised countersigned Bilateral Connection Agreement.

Workgroup Members discussed the distinction between Alternative Request 03 and Alternative Request 01. Both requests appeared to move from discretion to obligation, but Alternative Request 03 included a time-based cap and applied only to specified Queue Management milestones. A Workgroup Member considered that this restriction may make Alternative Request 03 more proportionate than full alignment with the revised connection date, because it would limit the potential for users to gain an additional benefit where they had previously delayed their connection date but their Queue Management milestones had not moved.

Workgroup Members also discussed how the proposal would interact with the existing exceptions process and previous work on Queue Management milestone extensions, including CMP465. A NESO representative noted that NESO had already built in an exceptions process to address some Gate 2 to Whole Queue delays and had implemented additional measures to address related pain points. However, the proposer of the Alternative Request remained concerned that the existing approach was discretionary and did not provide sufficient certainty for users or investors taking on revised securities and liabilities.

The Chair noted that NESO legal team was reviewing whether Alternative Request 03, alongside Alternative Request 01, was within the scope of CMP471.

Alternative Request voting preparation

The Chair explained that voting on the Alternative Requests would take place at the next Workgroup meeting, once scope clarification and revised supporting material were available. Workgroup Members were reminded that any Alternative Requests taken forward to WACM stage would be assessed alongside the Original Proposal and the Baseline against the Applicable CUSC Objectives.

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Workgroup Members were encouraged to review the voting materials in advance and prepare their voting statements where required.

Workgroup Report

The Chair provided an update on the Workgroup Report and confirmed that the Collaboration Space would remain open until Wednesday afternoon to allow Workgroup Members to submit final comments. Workgroup Members were asked to provide comments rather than tracked changes to simplify the consolidation process.

The Chair emphasised that the Workgroup Report is the main record of the Workgroup's rationale, discussions and conclusions. Workgroup Members were encouraged to review it carefully before the deadline, so the final report accurately reflects the points raised.

Legal Text Review

The Proposer led the Workgroup through the latest legal text for the Original Proposal. The discussion focused on whether the drafting clearly captured the intended Connection Date Delay Request process, including who could use it, when it could be used, and how it would interact with existing Gate 2 processes.

The key point was that NESO legal team suggested setting the process out in a new standalone CUSC section rather than fitting it into existing Sections 17 or 18. NESO Legal explained that neither section was a perfect fit: Section 17 is focused on the gated application process, while Section 18 is framed around existing agreements and Gate 2 modification offers. A standalone section would allow the process to sit in one place and avoid unnecessary changes to enduring processes in its drafting. Workgroup Members supported using a new section as the basis for further drafting.

The Workgroup discussed how the definition in Section 11 should operate. NESO Legal suggested that the definition of the Completion Date Delay Request did not need to contain the full detail of the process if the process itself was set out in the new section. Workgroup Members generally supported retaining a defined term for a Completion Date Delay Request but keeping the definition short and cross-referring to the new section where the detailed process would be described.

The Workgroup also discussed eligibility and scope. A Workgroup Member asked whether Gate 1 with reservation offers should be included, excluded or expressly clarified in the drafting. NESO Legal advised that, because the proposal is framed by reference to the Gate 2 to Whole Queue process and Gate 2 modification offers, it would be helpful to include wording to make clear that a Completion Date Delay Request cannot be made in the context of a Gate 1 with reservation offer. The Proposer indicated that the modification was intended to be Gate 2 focused and was

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concerned about introducing Gate 1 with reservation arrangements unless there was a clear and simple pathway for doing so.

The remaining discussion focused on drafting points rather than changes to the underlying policy intent. These included: whether users could submit only one request per project; how to describe the process as limited and time-bound; how to cover users who have not yet accepted a Gate 2 modification offer and users who have already accepted one; and, what information should be included in an application. The Chair encouraged the Proposer, NESO Legal and interested Workgroup Members to work through detailed wording outside the meeting, with unresolved points brought back for further consideration.

AOB Discussion

Under Any Other Business, the Proposer requested an update on outstanding data from the NESO Request for Information relating to Transmission Owner activity. The NESO representative confirmed that the information was still being pursued and that discussions with the Transmission Owners were ongoing.

The Chair proposed carrying forward the remaining action review items to the next Workgroup meeting to maximise the time available for legal text discussions. No concerns were raised and the approach was accepted.

Next Steps

Workgroup Members were asked to submit final comments on the Workgroup Report before the Collaboration Space closes. The Proposer agreed to undertake further drafting work, supported by NESO Legal and interested Workgroup Members, to address the issues identified during the legal text review.

Legal advice will be provided on the scope of the Alternative Requests and feedback will be provided to the Workgroup. Revised wording for Alternative Request 02 will also be prepared for consideration. Workgroup Members were reminded to review the voting documentation and be prepared to assess the Original Proposal, the Baseline and each Alternative Request against the Applicable CUSC Objectives at the next meeting.

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Actions

For the full action log, click [here](#).

Action Number	Workgroup Raised	Owner	Action	Due by	Status
25	WG7	RM/TB	NESO to provide the workgroup with data indicating the potential volume of Connection Date Delay Requests, including relevant information gathered through its request for information process.	WG9	Open
26	WG7	TB	NESO to share its response on implementation and process arrangements once feedback has been received from the relevant internal IT and Connections teams.	WG9	Open
28	WG7	MD/TB/RM	Review the treatment of transitional offers and confirm whether this affects the proposed removal or retention of Section 18 drafting. Seek views from Ruth Matthew and TO representatives before finalising the legal text.	WG9	Open

Attendees

Name	Initial	Company	Role
Robert Hughes	RH	NESO	Chair
Mollie Griffiths	MG	NESO	Technical Secretary
Matthew Dowds	MD	Muir Hall Energy	Proposer
Terry Baldwin	TB	NESO	NESO Rep
Isabelle Vasko	IV	National Grid Electricity Transmission	Workgroup Member
Rob Smith	RS	Enso Green Holdings	Workgroup Member
Lamin Saidy Vulart	LSV	Qair UK	Workgroup Member

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Thomas O'Neill	TO	Qair UK	Workgroup Member (alt)
Kirsty Dawson	KD	Stratkraft	Workgroup Member
Qiabin Su	QS	Northern Powergrid	Workgroup Member
Andrew Allan	AA	RWE	Workgroup Member (alt)
Ciaran Fitzgerald	CF	Scottish Power Renewables	Workgroup Member
Niall Stuart	NS	Hutcheson Associates	Workgroup Member
Ben Clarke	BC	Bute Energy Ltd	Workgroup Observer
David Barber	DB	GridLink Interconnector Ltd	Workgroup Observer
Ruth Matthew	RM	NESO	NESO Rep
Gareth Williams	GW	Scottish Power Transmission	Workgroup Member
Richard Woodward	RW	National Grid Electricity Transmission	Workgroup Member
Fiona Casey	FC	SSE Transmission	Workgroup Member
Damian Clough	DC	SSE Generation	Workgroup Member
Garth Graham	GG	SSE Generation	Workgroup Member