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Code Administrator Consultation Response Proforma

CMP472: Large Embedded Generators Original Red Line Boundary Sharing Without Customer Consent

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 19 May 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:	Ross O'Hare	
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Phone number:	07586288594	
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

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I wish my response to be:

(Please mark the relevant box)	☒ Non-Confidential (<i>this <u>will be shared</u> with industry and the Panel for further consideration</i>)
	☐ Confidential (<i>this will be disclosed to the Authority in full but, unless specified, <u>will not be shared</u> with the Panel or the industry for further consideration</i>)

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

- a) 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

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***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) 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;*

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- 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 Code Administrator Consultation questions

1	Please provide your assessment for the proposed solution against the Applicable Objectives versus	Mark the Objectives which you believe the proposed solution better facilitates than the current baseline:	
		Original	☒ i ☒ ii ☐ iii ☒ iv ☐ None
		The importance of DNOs having sight of a Large embedded generators Red Line Boundary is essential. This aligns with the policy direction of Reform to ensure that the project for which an	

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	the current baseline.	offer was issued has progressed. This reduces the incentive for customers to get an offer and place in the connections queue and then change the location of their project. The Distribution allowable changes policy does not allow for significant change to a projects Red Line Boundary. It is critical DNOs have early sight of these to review and check there is no major changes. This will ensure projects are progressing on the correct site, promoting a more efficient and coordinated system. We believe this proposal better facilitates objectives (i) and (iv) by creating a more efficient process. The proposal will prevent customers sending different Red Line Boundaries to NESO as they are to DNOs, creating a more rigorous process. This will prevent customers receiving a Gate 2 offer from NESO and progressing financially, only for DNOs to initiate termination of their Distribution offer if the Red Line Boundaries do not match. This proposal will provide a more efficient process where Red Line Boundaries are reviewed at the start of their application. Ensuring that Gate 2 offers are issued only where the Red Line Boundary aligns with the information submitted to both NESO and network operators supports effective competition and helps meet objective (ii). This approach will result in a queue comprising projects, large included, whose Red Line Boundaries have been subject to the same Gate 2 validation checks by DNOs against the
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		originally agreed submissions, thereby promoting fairness, consistency, and equal treatment across all projects.
2	Do you support the proposed implementation approach?	☒ Yes ☐ No We support this proposal as it would provide DNOs with visibility of the Red Line Boundaries associated with large projects, enabling us to verify alignment with our existing records and ensure confidence that network development is being planned for the correct site. As this was not mandated during the G2TWQ process, DNOs had limited visibility of the Red Line Boundaries under which some projects were progressing through the Gate 2 process. Earlier visibility would help mitigate the risk of non-compliant distribution customers advancing through the process.
3	Do you have any other comments?	We believe the legal text should specify a timescale for sharing the Red Line Boundaries with DNOs. This should be shared relatively quickly, for example within 5 working days, to ensure a transparent process where any issues can be picked up at the earliest opportunity.

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4	Do you agree with the Proposer's assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code?	☒ Yes ☐ No
		We agree that the modification does not impact the EBR.