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# Code Administrator Meeting

## Summary

Workgroup Meeting 6: CMP414 – CMP330/CMP374 Consequential Modification

**Date:** 02/03/26

### Contact Details

Chair: Robert Hughes, [robert.hughes3@neso.energy](mailto:robert.hughes3@neso.energy)

Proposer: Neil Dewar, [neil.dewar@neso.energy](mailto:neil.dewar@neso.energy)

### Key areas of discussion

This meeting focused on a Demand Connection Reform update provided by the Authority, a revised timeline, and a review of open actions.

### Demand Connection Reform

The Workgroup received from a representative of the Authority a Demand Connections Reform update and its relevance to CMP414. It was explained that a Call for Input was issued on 13 February which seeks industry views on addressing a growing demand connections queue, delays to well progressed projects and the lack of mechanisms to prioritise strategically important connections.

The reform aims to enable timely connections for viable projects, prioritise projects of strategic importance, deliver consumer benefits and maintain system security and operational integrity. The programme is structured around Create, Plan and Connect with CMP414 falling within the connect pillar, with its outputs informing the Authority’s wider reform work regardless of whether changes progress via the standard code modification route or Planning and Infrastructure Act (PIA) powers.

The Authority advised that PIA gives the Authority and the Secretary of State powers to make licence and code modifications within a defined scope. This will aim at improving the connections process. Where these powers are used, a separate statutory process applies, including consultation where consultation responses are taken into account before final decision. This process differs from

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the standard industry modification route and can apply to both licences and codes.

Workgroup members raised concerns regarding demand customers, particularly the legal and regulatory uncertainty associated with self-build, commissioning, asset ownership and transfer under the Electricity Act and licence exemption framework. It was noted that some demand customers may be offered connections that would require ownership of transmission assets, creating uncertainty over legal deliverability. The Workgroup members emphasised the need for clearer regulatory and legislative clarity, especially during commissioning and transfer periods.

The Workgroup highlighted that CMP414 is primarily focused on extending contestability for longer sole use transmission assets and enabling self-build and transfer for adoption by the transmission owner, rather than addressing primary legislation. CMP414 was considered more readily applicable to generation projects, with greater practical impact expected in Scotland due to network configuration, although it may provide a starting point for Demand Connections subject to wider reforms.

The Workgroup also considered evidence requirements, noting that despite sustained efforts, limited empirical data has been obtained. It was agreed that the Workgroup should proceed using clear and transparent assumptions, in line with the Authority guidance, to avoid further delay.

The Chair summarised that the Workgroup should continue progressing CMP414 through the normal governance CUSC process noting that the work will not be wasted and can support either route for decision and implementation.

The Proposer emphasised the importance of maintaining focus on CMP414's remit, including alignment with consequential STC modification CMO79. Any changes to primary legislation sit outside the scope of the modification.

## Objectives and Timeline

The Chair shared a revised timeline to include additional Workgroups at which the Workgroup Consultation will move from 06 March – 27 March to 27 March – 21 April. This will enable further work to refine the solution before seeking industry

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feedback. The timeline amendment does not affect the DFMR being delivered to Panel. The Workgroup did not challenge the updated timeline.

### **Send Back issues – Actions Log update**

The Workgroup reviewed the actions log:

Action 6.1 – Closed. The Proposer reported that National Grid/Eir Grid is unable to support requests for information relating to contestable builds at this time. Providing such information would require a full internal consultation and governance process, and that there is currently insufficient bandwidth to do so. The Proposer concluded no further progress can be made on this action.

Action 6.2 – Closed. The Proposer held a meeting with the Scottish Transmission Owners at the end of January to explore whether any analysis or evidence could be provided. Scottish TOs had only recently been engaged and are currently considering whether any relevant information can be made available. The Proposer indicated that this work is ongoing, but acknowledged constraints on time and availability, with the activity now effectively captured under related actions focused on TO input, so should close this action.

Action 6.4 – Closed. The Proposer advised a meeting was held with Scottish Renewables and Renewables UK. NESO has also presented at forums and requested evidence at both industry forums. No evidence has been forthcoming to either Workgroup or the Authority on a confidential basis.

A Workgroup member advised that ESB undertook a high-level analysis of contestability impacts using a 110 kV looping connection as a representative case. It was noted that direct comparison with non-contestable delivery is limited, as contestability is the norm in Ireland. The analysis indicates potential cost savings of up to c.20%, based on comparisons with Eir Grid standard costs, although detailed data cannot be shared. Indicative time savings of around 5 months were observed against a historic benchmark, with up to 11 months potentially achievable for future projects, noting limitations due to reliance on historic data.

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The Workgroup member agreed to present their findings at the next Workgroup and circulate their analysis by email (**Action 6.11**).

Action 6.6 – Open. The Proposer advised further investigations are required for Scottish TOs.

Action 6.8 – Open. A Workgroup member advised that SSEN has been unable to provide a cost/benefit analysis for contestable transmission works due to a lack of access to developer contractor pricing and the absence of any completed contestable transmission projects to use as an evidence base. They noted that SSEN incurs unavoidable internal costs for specification, technical assurance and oversight of contestable works which are variable and cannot be reliably modelled in advance.

The Workgroup member also stated that in SSEN’s area, connection dates are primarily driven by shared use infrastructure, meaning that making sole use works contestable would often not materially accelerate connections. They highlighted additional system integrity, protection and operational risks, which are qualitative in nature and cannot be meaningfully reduced to cost figures. As a result, concluded that any quantitative analysis at this stage would be highly hypothetical and potentially misleading.

Workgroup members discussed whether contestable delivery of sole use assets could still provide benefits where shared use infrastructure remains the primary constraint on connection dates. It was reiterated that, in SSEN’s area, shared use works generally determine delivery timelines, limiting the potential impact of contestability. It was acknowledged that SSEN’s position reflects evidence and system specific constraints, rather than opposition to contestability in principle and that these limitations should be clearly captured in the Workgroup’s reporting.

The email setting out the SSEN position will be circulated to the Workgroup to view (**Action 6.12**).

Actions 6.9, 7, 7.1, 7.2 and 7.3 – open and to be further progressed.

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Action 8.1 – Open. The Proposer requested the Action to include an update: to include consideration of charging implications, including impacts on local circuit tariffs, following points raised in JO’s presentation. The Proposer confirmed he would follow up with the relevant teams to progress this work.

Actions 8.2, 9 and 10 – Open.

### Review: Risk Register Template

The Proposer explained that the risk register reflects the work already undertaken by the Workgroup, particularly in response to Authority’s concerns around sub-standard assets. The register captures identified risks, mitigations, likelihood and impacts. It is intended to be an iterative document, updated as further risks are identified.

The Proposer confirmed that there was nothing new to add at this stage, and that the risk register is expected to support the Final Modification Report, likely as an annex or appendix.

### Terms of Reference

The Workgroup made no comments on the Terms of Reference.

### Any Other Business

No AOB items were discussed.

### Next steps

The additional Workgroup invites will be circulated to the Workgroup.

### Actions

Action Number Raised	Workgroup	Owner	Action	Due by	Status
6			<b><u>Lack of clarity on benefits</u></b>		
6.1	WG3	ND	Investigate whether Eirgrid’s previous cost benefit analysis on contestable works can be	WG4	Closed

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			sourced and considered as part of the evidence base.		
6.2	WG3	ND, AP & MPS	Review available ENA data and independent analysis on financial and time-saving benefits.	WG4	Closed
6.4	WG3	ND & DR	Explore the possibility of obtaining data on contestable connections directly from developers via industry associations such as Renewable UK, Scottish Renewables, and Solar UK, and report on feasibility and progress	WG4	Closed
6.6	WG3	MPS, ND	Draft a written summary on the realistic scope and metrics for construction of sole use circuits over 2 kilometres at various voltage levels, including the likelihood and potential benefits, for consideration by the Workgroup	WG4	Open
6.8	WG5	MH & NG	Supply Cost Benefit data to broaden the evidence base, on additional costs and experiences from their respective organisations	WG6	Open
6.9	WG5	KE	To confirm if any developers have been in direct contact with Ofgem regarding contestable connections.	WG6	Open

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6.11	WG7	LA	Circulate analysis on contestability impacts	WG8	Open
6.12	WG7	MH	Circulate analysis undertaken for Action 6.8.	WG8	Open
7			<b><u>Lack of clarity on risks of Sub-standard assets</u></b>		
7	WG3	ND/WG	Produce a risk register detailing risks and mitigations associated with substandard assets in contestable works, including consideration of legal and contractual protections, with input from the Workgroup	WG4	Open
7.1	WG6	KE	Provide feedback on whether additional legal text is required to address substandard assets and clarify if this should be included in adoption agreements or elsewhere.	WG7	Open
7.2	WG6	KE	Clarify why the regulator's approach to contestability differs between distribution and transmission, referencing previous competition in connections experience.	WG7	Open
7.3	WG6	KE	Clarify whether obligations to ensure asset quality in contestable arrangements should be addressed in party	WG7	Open

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Licenses rather than solely in the CUSC.

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**Lack of Charging considerations**

8.1	WG6	ND	Consult with NESO revenue and charging teams to clarify TNUoS when sole use infrastructure assets become shared after the fact.	WG7	New
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Update: consider charging implications, including impacts on local circuit tariffs, following points raised in JO's presentation

8.2	WG6	JO	Request data from Renewable UK and other trade bodies regarding cost escalation seen by developers from the TOs for inclusion in the Workgroup Report.	WG7	New
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**Lack of analysis on Anticipatory Investment**

9.1	WG3	AP, MPS & ND	AP and MPS to work with ND on scenario analysis for anticipatory investment (AI), focusing on real-life examples and the impact on future network sharing	WG4	Open
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**Misalignment of the STC and CUSC**

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10.1	WG3	ND & MPS	Review and align legal text between the CUSC and STC modifications, ensuring consistency in compensation and intervention clauses	WG4	Open
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## Attendees

Name	Initial	Company	Role
Robert Hughes	RH	Code Administrator, NESO	Chair
Tammy Meek	TM	Code Administrator, NESO	Tec Sec
Neil Dewar	ND	NESO	Proposer
Andy Colley	AC	SSE Generation	Workgroup Member Alternate
Andy Pace	AP	Energy Potential Consulting	Workgroup Member
Dimitrios Terzis	DT	SSENT	Workgroup Member Alternate
Iwan Watkin	IW	Renantis/Bluefloat Partnership	Observer
Jonathan Oguntona	JO	Baywa-Re	Workgroup Member
Kingsley Emeana	KE	Ofgem	Authority Representative
Lina Apostoli	LA	ESB Generation & Trading	Workgroup Member
Matthew Paige-Stimson	MPS	NGET	Workgroup Member
Neil Geddes	NG	SP Energy Networks	Workgroup Member
Phoebe Finn	PF	Statera Energy Limited	Workgroup Member
Ruth Macdonald	RM	Ofgem	Authority Representative
Tim Ellingham	TE	RWE	Workgroup Member