

SPT's Position

SPT recognises the potential role that expanded contestability could play in supporting timely and efficient delivery of network connections and acknowledges the broader policy intent to explore alternative delivery models where these can add value. At transmission level, however, the evidence base and maturity of arrangements are still developing, and SPT considers that a number of important considerations must be addressed to ensure that any expansion of contestability operates effectively and supports long-term system outcomes.

Evidence of Benefits and Cost Efficiency

While contestability may provide opportunities for innovation and flexibility, the limited number of transmission projects delivered through contestable routes means there is insufficient operational evidence to demonstrate reductions in overall costs or resourcing requirements. In particular, there is limited evidence that any upfront efficiencies would not be offset by increased whole-life costs where asset specifications diverge from established Transmission Owner standards, including Approved Equipment policies, with such impacts ultimately borne by UK consumers. The absence of a meaningful body of completed transmission-level projects also creates a gap in understanding, particularly regarding the level of Transmission Owner involvement required for design assurance, coordination, oversight, and asset adoption. As a result, it remains unclear whether contestability at transmission level would deliver net efficiency benefits or instead introduce additional operational burden.

Developer Benefit and Delivery Outcomes

The Feedback from developers indicates that contestability has the potential to offer greater flexibility in some circumstances; however, the overall benefits are not yet clear. This is largely due to the very limited number of transmission projects that have progressed through comparable contestable delivery and adoption arrangements. Where similar approaches have been pursued, they have highlighted that potential gains can be offset by increased interface management, assurance requirements, and adoption complexity. As a result, there is insufficient practical experience at transmission level to confirm that contestability delivers consistent and predictable benefits for developers.

Impact on Connection Timescales

SPT notes that transmission connection timescales are typically driven by wider system reinforcements, outage availability, and strategic network constraints rather than the delivery of sole use assets alone. While contestable delivery may accelerate certain elements of a connection, this does not always translate into earlier energisation where system-wide works remain on the critical path. Clarity on where and how contestability can genuinely influence end-to-end connection timelines would help ensure expectations are well-aligned.

System Planning and Anticipatory Investment

SPT considers it important that any expansion of contestability supports, rather than constrains, efficient anticipatory investment. User led delivery arrangements are inherently focused on meeting immediate connection requirements, which can limit consideration of longer term system optimisation. While intervention rights are recognised in principle, there is currently limited clarity on how these safeguards would operate in practice or how Transmission Owners' ability to optimise asset sizing and timing for future system requirements would be preserved. As a result, some uncertainty remains as to whether expanded contestability could, in certain circumstances, constrain efficient forward looking network investment.

Asset Quality, Operability, and System Integration

Maintaining high standards of asset quality and operability is critical to the safe and efficient operation of the transmission system. Any assets delivered by Transmission Connected Parties must meet the same standards of design, specification, and whole-life performance as those delivered directly by the Transmission Owner, and be fully operable, maintainable, and supportable throughout their life without creating additional or unforeseen burdens for operational teams. Contractor accreditation and competency frameworks, as used effectively in Distribution, provide valuable learning and can support consistent standards and quality assurance. As a minimum, the Transmission Owner should operate an accreditation-based system to validate third-party design, delivery, and operation and maintenance arrangements. However, given the scale, complexity, and criticality of transmission assets, accreditation alone may not be sufficient to fully mitigate risk and should form part of a wider control framework.

Roles, Responsibilities, and System Operation

Clear allocation of roles and responsibilities is essential for effective system operation. Maintaining system integrity and ensuring that any flexibility granted to connecting parties does not undermine the long-term operability or efficiency of the network, must be treated as critical. At present, there remains a lack of clarity around operational accountability during delivery, pre-adoption, and transition to live operation, as well as how intervention decisions would be exercised in practice to protect system security. Uncertainty also persists regarding the consistent application of operational standards across User-appointed contractors, the management of assets whose use may evolve over time, and arrangements for emergency response and fault management once assets are integrated. Ensuring robust end-to-end integration with the existing transmission system, including protection, control, commissioning, and outage planning; is therefore essential to maintaining system security and compliance with licence and safety obligations. These unresolved issues present a continuing source of operational risk.

Maturity of Arrangements

Overall, SPT considers that the proposed arrangements represent an important area for further development but are not yet sufficiently mature to support confident conclusions on cumulative system, operational, and governance impacts. Additional development, clearer articulation of processes and responsibilities, and a stronger body of empirical evidence would help demonstrate how expanded contestability could be implemented in a way that aligns with transmission level realities and delivers positive outcomes for developers, network operators, and consumers alike.

Overall, SPT supports continued exploration of contestability where it can add value, but considers that further work is required to ensure that any expansion at transmission level is underpinned by robust evidence, clear accountability, and arrangements that support efficient system planning, operation, and long-term performance.