Public

CMP414 ‘CMP330/CMP374 Consequential Modification’

Workgroup 10 – 28 May 2026

Online Meeting via Teams

NESO
National Energy System Operator

WELCOME

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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

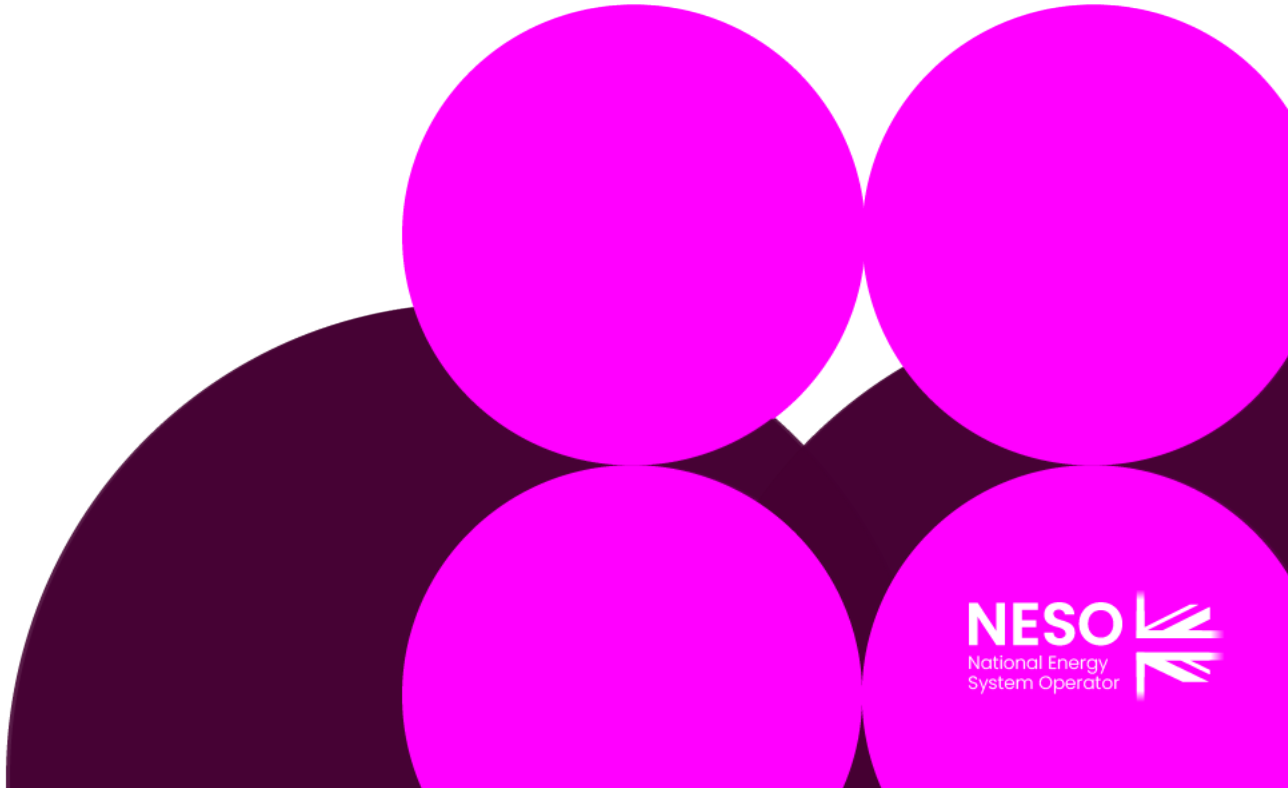
- Help refine/develop the solution(s)
- Bring forward alternatives as early as possible
- Vote on whether or not to proceed with requests for Alternatives
- Vote on whether the solution(s) better facilitate the Code Objectives

Agenda

#	Topics to be discussed	Lead
1.	Welcome	Chair
2.	Objectives and Timeline	Chair
3.	Workgroup Consultation Report Responses	Chair
4.	Terms of Reference	Chair
5.	Any Other Business	Chair
6.	Next Steps	Chair

Objectives and Timeline

Robert Hughes – Workgroup Chair



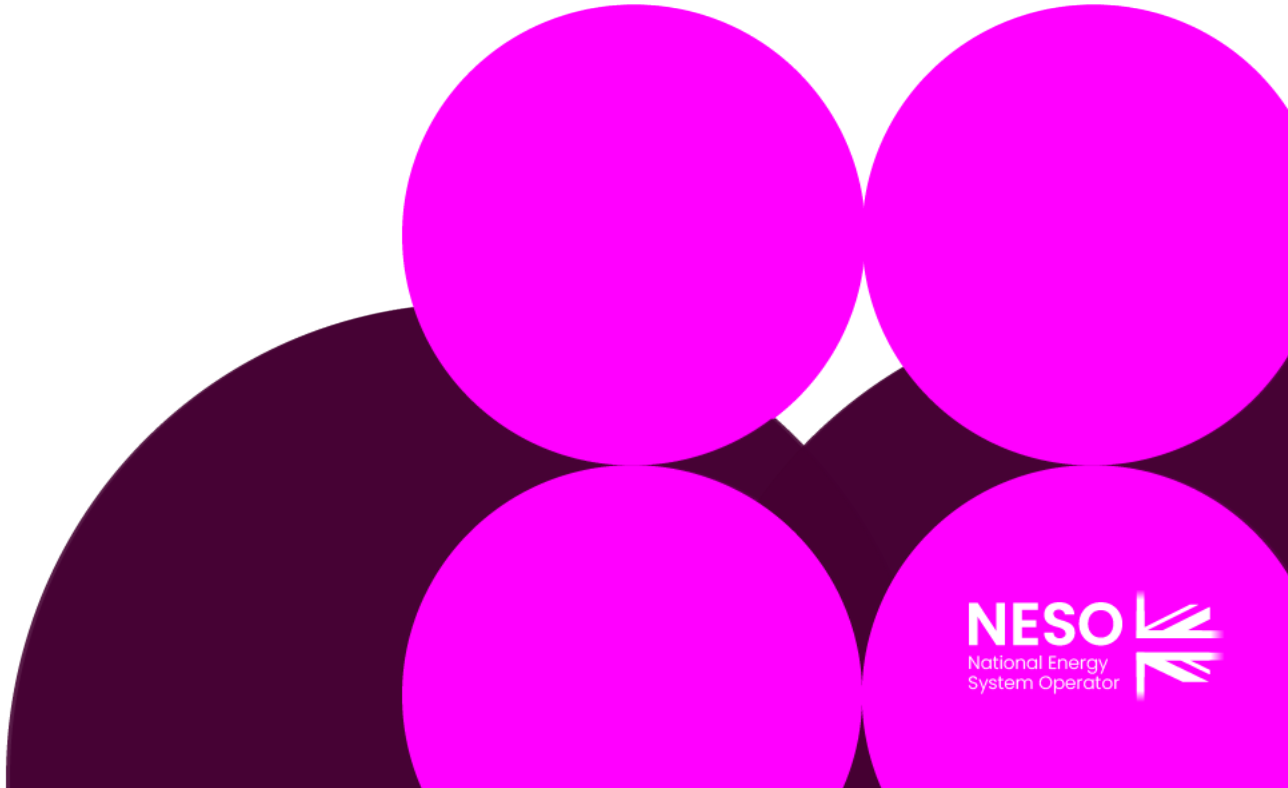
Timeline

Timeline for CMP414

Workgroups	
CMP414 Code Administrator Consultation	*01 June 2023 – 29 June 2023*
CMP414 Draft Final Modification Report to Panel	*20 July 2023*
CMP414 Final Modification to Ofgem	*10 August 2023*
Authority Send Back	*08 July 2024*
CMP414 Workgroup 1	*17 February 2025*
CMP414 Workgroup 2	*20 October 2025*
CMP414 Workgroup 3	*17 November 2025*
CMP414 Workgroup 4	*11 December 2025*
CMP414 Workgroup 5	*12 January 2026*
CMP414 Workgroup 6	*02 February 2026*
CMP414 Workgroup 7	*02 March 2026*
CMP414 Workgroup 8	16 March 2026
CMP414 Workgroup 9	20 April 2026
CMP414 Workgroup Consultation	24 April 2026 – 18 May 2026
CMP414 Workgroup 10	28 May 2026
CMP414 Workgroup Report to Panel	18 June 2026
Post Workgroups	
CMP414 2nd Code Administrator Consultation	29 June 2026 – 20 July 2026
CMP414 2nd Draft Final Modification Report to Panel	20 August 2026
CMP414 2nd Final Modification to Ofgem	10 September 2026
CMP414 Implementation Date	TBC

Workgroup Consultation Report Responses

Robert Hughes – Workgroup Chair



CMP414 Workgroup Consultation Responses Review

Number of Responses/Alternatives	
Confidential Responses	2
Non-Confidential Responses	7
Alternative Requests Raised	0

Industry Sector Representation*	
Consumer body	
Demand	2
Distribution Network Operator	
Generator	3
Industry body	
Interconnector	
Storage	1
Supplier	
System Operator	
Transmission Owner	2
Virtual Lead Party	
Other	1

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

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CMP414 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	5		
	ii	5		
	iii	2		
	iv	4		
	None	2		
Do you support the proposed implementation approach?		5	2	0
Does the draft legal text satisfy the intent of the modification?		5	1	1
No respondents raised Workgroup Alternative Requests during the Workgroup Consultation.				
No respondents indicated that they disagreed with the Workgroup's assessment that the modification does not impact the European Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the CUSC.				

CMP414 Standard Workgroup Consultation Responses Review

Key Points (1)

Some of the key points supporting the modification included:

- Contestability is well established at distribution level, with ~20 years of proven success.
- Expanding contestability at transmission is expected to improve lead times and customer outcomes.
- CMP414 supports greater customer choice and more flexible, timely connection delivery.
- Enhances Licensees' ability to meet obligations through increased use of contestability.
- Simplifies and improves accessibility of contestability for Users.
- Removal of the 2km rule enables more user-built assets.

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CMP414 Standard Workgroup Consultation Responses Review

Key Points (2)

Supportive comments continued:

- Particularly beneficial for remote areas (e.g. North Scotland) with long connection distances.
- Provides Users with greater flexibility in design and delivery of assets.
- Likely to reduce costs and speed up connections if effectively implemented.
- Benefits depend on clear scope, defined responsibilities, and strong safeguards.
- Increases user-led delivery, allowing Users to construct more connection assets instead of relying solely on TOs.

CMP414 Specific Workgroup Consultation Responses Review

Q7 - Do you believe that the Workgroup met the questions and concerns raised by Ofgem in the send back letter of August 2024. If not, please would you provide further information or evidence on any of the points set out in the send back letter appearing in Annex 03 of this report

- There was a mixed response to this question:
  - I respondent replied “Yes”
  - 4 respondents replied “No”
  - 2 respondents provided no response to the question

- **The “Yes” response felt that:**
- Workgroup has clarified key risks, processes, and mitigation measures around contestability.
- It provided evidence of financial and time-saving benefits, supported by data and insights from Ireland’s experience.

CMP414 Specific Workgroup Consultation Responses Review

Q7 - Do you believe that the Workgroup met the questions and concerns raised by Ofgem in the send back letter of August 2024. If not, please would you provide further information or evidence on any of the points set out in the send back letter appearing in Annex 03 of this report

The "No" responses felt that:

- Workgroup has made efforts to address Ofgem's concerns, but evidence is still unlikely to fully satisfy requirements.
- Limited quantitative and qualitative analysis, particularly from NGET, represents a missed opportunity.
- Lack of contestable build experience in Scotland should not prevent future development; emerging project examples could provide useful insights.
- Some progress has been made in refining CMP414 scope and clarifying its role as a consequential modification.
- Key limitations stem from a lack of real-world GB transmission experience at the required scale and complexity.
- Benefits and risks are largely based on assumptions, with insufficient evidence on delivery, system integration, and cost impacts.
- Overall, important uncertainties remain, particularly around consumer benefits and robust risk allocation frameworks.

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CMP414 Specific Workgroup Consultation Responses Review

Q8 - To what extent does CMP414, consequential to CMP330/374, help achieve the objectives outlined in Ofgem's demand connections reform call for input, as well as providing benefits to generation and storage? What gaps do you believe there are and what would you recommend to address them? Please provide evidence for any comments

There was an extensive response to this question. Summary of key points:

- Contestability is well proven at distribution level, delivering strong consumer value and should inform transmission reforms.
- Transmission contestability is less mature and expanding it could improve competition and delivery outcomes.
- Strong support for CMP414 to increase customer choice, flexibility, and self-build opportunities.
- Removing the 2km rule and enabling sole-use asset self-build should reduce costs and speed up connections.
- Further reforms are needed, including private HV ownership, Independent TO models, and GridCo/private network solutions.

CMP414 Specific Workgroup Consultation Responses Review

Q8 - To what extent does CMP414, consequential to CMP330/374, help achieve the objectives outlined in Ofgem's demand connections reform call for input, as well as providing benefits to generation and storage? What gaps do you believe there are and what would you recommend to address them? Please provide evidence for any comments

- Evidence for consistent cost and time savings remains limited and requires further validation.
- Delivery timelines are still largely driven by wider system constraints (e.g. reinforcements, outages).
- Contestability is most effective for discrete, low-complexity, sole-use assets (e.g. 132kV).
- Strong safeguards, coordination, and clear accountabilities are critical to success.
- Misalignment of incentives, risks, and ownership could impact long-term efficiency and system outcomes.
- Rising and unpredictable TO costs are a key driver for increased demand for contestability.
- Overall, CMP414 is a useful enabling measure, but requires wider reforms and careful implementation to deliver full benefits.

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CMP414 Workgroup Consultation Responses Review

Key concerns (1)

- Proposal may add unnecessary complexity alongside major reforms (e.g. RNP, connections reform).
- Unclear alignment with wider frameworks such as SSEP and CSNP.
- Evidence base is limited, case-specific, and not sufficient to justify the modification.
- Uncertainty that cost savings would be consistently realised.
- Risk that increased contestability adds complexity without clear efficiency gains.

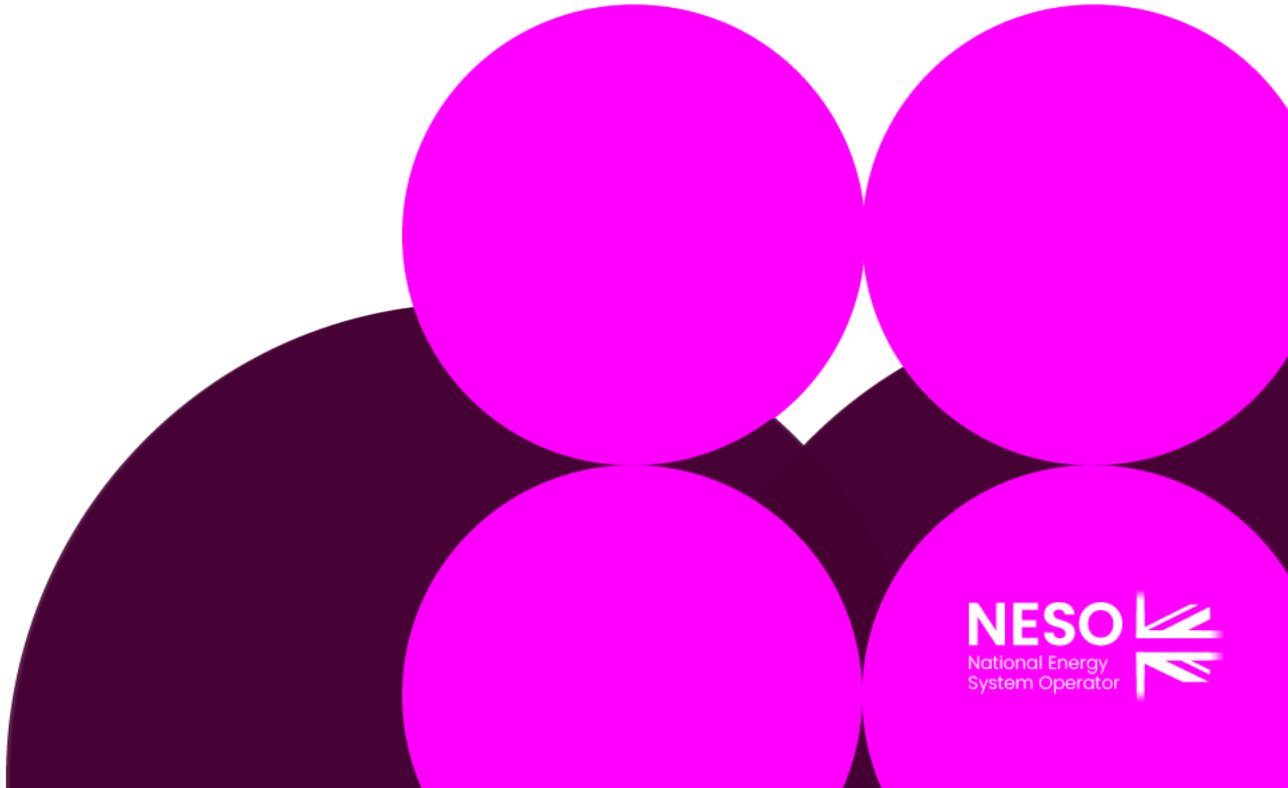
CMP414 Workgroup Consultation Responses Review

Key concerns (2)

- Intervention and adoption risks remain unclear, especially for late-stage failure scenarios.
- Lack of clarity on roles between Users and Transmission Owners may lead to disputes.
- Future transition of sole-use assets to shared use creates design and cost allocation challenges.
- Misaligned milestones and interdependencies could lead to cascading delays.
- Need for strong processes to manage changes, disputes, and delivery failures.
- Incentive misalignment may drive users to prioritise speed over whole-system efficiency and long-term outcomes.

Terms of Reference

Robert Hughes – Workgroup Chair

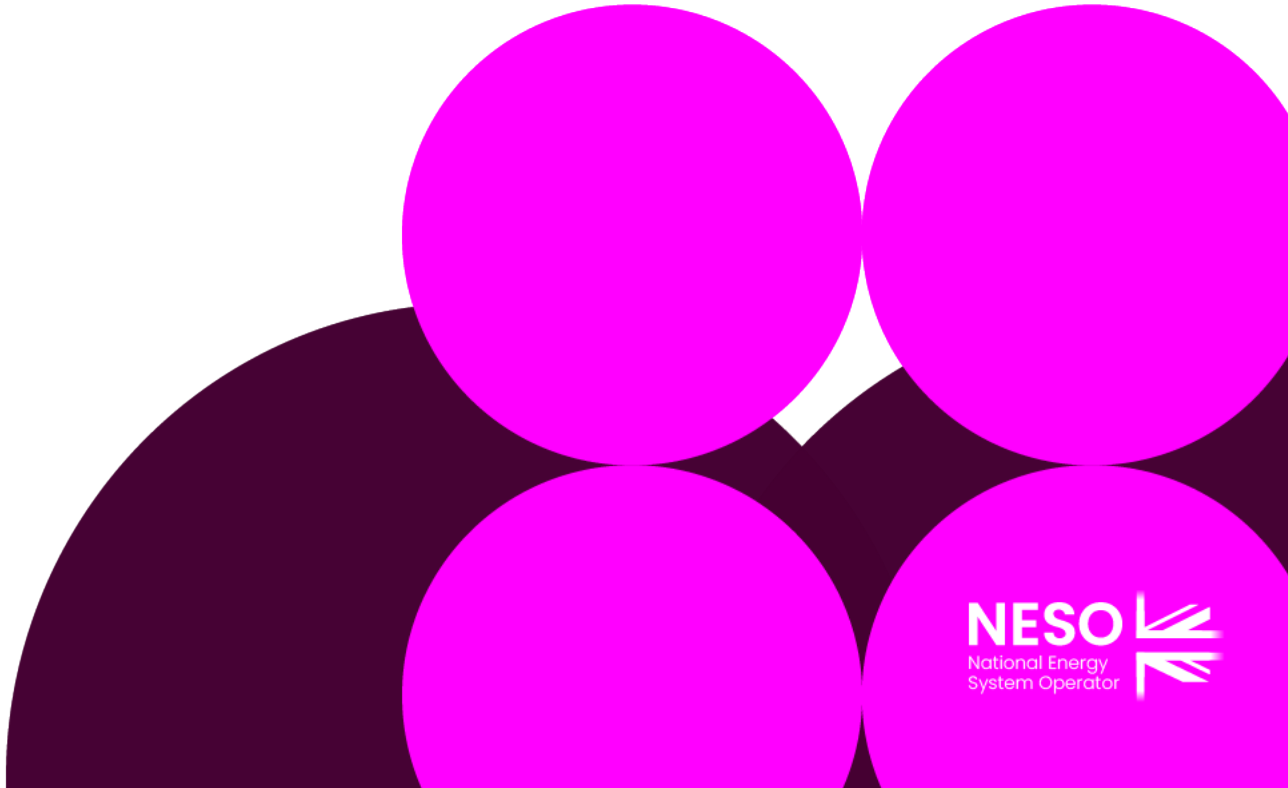


Terms of Reference

CMP414 Workgroup Term of Reference
a) Consider EBR implications
b) Provide clarity on potential and proposed benefits, in particular: • Financial benefits • Time saving benefits
c) Provide clarity on, and mitigation of, the risks in relation to Sub-Standard Assets and when Assets are shared
d) Provide clarity on Charging and the interaction with the existing charging regime.
e) Provide clarity on the impact on any Anticipatory Investment(s), including clarity on, and mitigation of any risks.
f) Provide clarity of true intent of proposal, given various instances of misalignment of STC and CUSC.
g) Provide clear analysis of TO- Contracted Users Incentives in terms of quality of build.

Any Other Business

Robert Hughes – Workgroup Chair



Next Steps

Robert Hughes – Workgroup Chair