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# Code Administrator Meeting

## Summary

Workgroup Meeting 12: CMP470 – Introducing an Oversubscribed Technologies Commitment Fee (OTCF)

**Date: 04 June 2026**

### Contact Details

Chair: Claire Gault, [Claire.gault@neso.energy](mailto:Claire.gault@neso.energy)

Proposer: Andrew Enzor, [Andrew.enzor@field.energy](mailto:Andrew.enzor@field.energy)

### Key areas of discussion

The meeting focused on reviewing and refining the Workgroup Report, alongside a brief update on the legal text. The Workgroup also discussed the timeline, received an update on the Connections Methodologies Consultation, and considered Ofgem’s agreement on the timetable for issuing connection offers under the Gate 2 to Whole Queue (G2tWQ) process.

### Timeline Update/Action Update

The timeline was updated to prioritise completion of the legal text, with the original drafting finalised first, followed by WACM legal text. Additional meetings were scheduled to support this sequence, before moving to finalise the Workgroup Report and complete the Workgroup Vote. Adjustments to meeting timings ensured members had sufficient time to review materials in advance, enabling informed discussion and maintaining progress toward the final decision.

The Workgroup members reviewed the status of all actions to confirm which could be closed and which required further input. Actions supported by completed analysis or incorporated into the Workgroup Report were closed, while those dependent on outstanding data, SME input, or further clarification were retained as open.

Where actions could not be completed within the available timeframe, Workgroup members agreed that this would be clearly documented in the Workgroup Report, including the reasons and any next steps. The discussion reinforced the need for a clear and auditable position, ensuring all actions are either evidenced, appropriately referenced, or transparently recorded as incomplete ahead of the final Workgroup Vote.

### Connections Methodologies Consultation Update

The presentation provided a high-level overview of the Connection Methodologies Consultation responses, highlighting that while stakeholders broadly agreed that intervention is required to address battery oversupply, there was no clear consensus on the most appropriate approach. A

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slight majority of respondents opposed the disapplication of protections in the next window, raising concerns around retrospective change, fairness, and potential regional impacts, particularly in relation to planning differences in Scotland. Other respondents were either supportive or neutral, generally acknowledging the need for action but questioning whether the proposed approach was the most effective solution. There was a strong theme that financial mechanisms would be more appropriate, with several respondents referencing CMP470 explicitly and suggesting that existing incentives, such as the PCF, were not sufficiently strong to drive the necessary behavioural change.

Stakeholders also suggested a range of complementary measures, including strengthened queue management milestones, expanded contestable build, and mechanisms such as cost or technology amnesties to facilitate voluntary exit from the queue. Co-located and hybrid projects were identified as areas requiring further consideration, particularly in how they interact with oversubscription and network constraints. It was noted that the detailed response to the consultation remained confidential pending submission to Ofgem, although it was confirmed that the methodology would be submitted in mid-June, with publication expected shortly thereafter.

Workgroup members responded positively to the update, noting its value in informing the Workgroup Report and supporting transparency of evidence. In particular, there was agreement that elements of the consultation themes could be incorporated into the Workgroup Report to strengthen the rationale and context for the modification. Workgroup members also sought clarification on publication timelines, which was confirmed would follow shortly after submission to Ofgem and be subject to the Authority's decision. Overall, the discussion recognised the consultation output as an important input to the Workgroup's deliberations, particularly in reinforcing the case for a well-designed financial mechanism while acknowledging the complexity and sensitivity of wider policy considerations.

## Legal Text Update

The legal text update focused on progressing drafting toward a final, streamlined position in line with Workgroup feedback. Since the previous session, the original legal text had been significantly simplified, with complex scenario-based drafting replaced by a clearer structure that defines the cancellation charge as the maximum of existing components or the OTCF floor. This approach reduced complexity and improved readability, while remaining aligned with the intent agreed during earlier discussions. The original text was close to completion, with final refinements and incorporation of late comments still required before circulation.

The discussion also confirmed the planned sequencing of work, with the original legal text to be finalised first before building the WACM legal text on top of this consistent foundation. Progress

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had been made in understanding the intent of the key WACMs, and drafting for these was underway, with circulation planned following completion of the original text. Timelines for issuing drafts were agreed, along with expectations that members would have a defined window to review the text in advance of meetings to support more effective discussions.

Workgroup members focused on ensuring clarity and robustness of definitions, particularly in relation to securities data, maximum liabilities, and forward-looking assumptions used within the drafting. Clarifications were requested on how certain concepts are applied, including how data reflects frozen positions and how forward-looking profiles are treated in the legal formulation. There was also discussion on ensuring consistency between terminology used in data, legal drafting, and the Workgroup Report.

Further detailed discussion explored how specific scenarios should be captured in the legal text, including treatment of staged and co-located projects, with members highlighting challenges in defining capacity that has not yet connected. Suggestions were made to align definitions with existing contractual concepts where possible, and this area was identified for further refinement with legal input. Overall, the discussion reinforced the need for a clear, consistent, and auditable drafting approach, with a strong emphasis on aligning legal text with policy intent, ensuring definitional clarity, and providing sufficient opportunity for review ahead of finalisation.

### **Ofgem agreement regarding the timetable for issuing connection offers under the Gate 2 to Whole Queue (“G2tWQ”) process**

The Workgroup discussed Ofgem’s agreement on the timetable for issuing connection offers under the Gate 2 to Whole Queue (G2tWQ) process to determine whether it had any material impact on CMP470 and therefore required consideration in the Workgroup Report.

The initial view presented was that the decision was unlikely to be directly relevant, as it primarily related to the timing of connection offers rather than the policy intent of the OTCF. However, members explored whether the update could have indirect implications, particularly where revised deadlines might affect the sequencing of phase one and phase two offers or the treatment of co-located projects.

During the discussion, some Workgroup members highlighted that the Ofgem letter appeared to extend certain deadlines compared to previously published timelines, while others clarified that these changes were largely contingency provisions and did not alter the current baseline programme. This was subsequently confirmed, with clarification that the published timelines remain unchanged and that any reference to later dates reflects contingency flexibility rather than a committed shift in delivery.

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The Workgroup also considered whether any reference to the decision should be included in the Workgroup Report. While acknowledging that the decision is relevant in a broader connections context, the prevailing view was that it does not materially affect CMP470. As such, it was agreed that either limited reference or concise explanatory wording would be sufficient, ensuring accuracy without overstating its relevance.

## Draft Workgroup Report Discussion

The Workgroup Report discussion focused on refining the document to ensure clarity, consistency, and completeness ahead of finalisation. Workgroup members systematically reviewed sections of the report, addressing drafting issues, correcting inconsistencies in terminology and data, and ensuring that key arguments and evidence were clearly and accurately represented.

Particular attention was given to aligning the Workgroup Report with the latest legal text, ensuring that definitions, parameters, and assumptions were consistently reflected across both documents. Workgroup members also refined explanatory text to improve readability and avoid ambiguity, including clarifying key concepts, strengthening rationale, and ensuring that stakeholder positions were fairly and accurately captured.

The Chair emphasised the importance of ensuring that all Terms of Reference are clearly evidenced within the Workgroup Report. Where information remained incomplete or unavailable, it was agreed that this should be transparently referenced, with appropriate explanation included. There was also focus on ensuring that consultation responses, data references, and external inputs were correctly attributed and contextualised.

## Next Steps

The next steps focused on finalising the legal text, followed by completion of the WACM variants, before closing out the Workgroup Report and confirming the Terms of Reference. This would lead directly to the Workgroup Vote, with members expected to review materials in advance to support a final decision.

## Attendees

| Name            | Initial | Company      | Role                |
|-----------------|---------|--------------|---------------------|
| Claire Goult    | CG      | NESO         | Chair               |
| Deborah Spencer | DSp     | NESO         | Technical Secretary |
| Andrew Enzor    | AE      | Field Energy | Proposer            |
| Andy Ho         | AH      | Field Energy | Proposer Alternate  |

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|-----------------------|------|------------------------------------|---------------------|
| Alastair Southworth   | AS   | Harmony Energy                     | Workgroup Alternate |
| Andrew Colley         | AC   | SSE Generation                     | Workgroup Alternate |
| Ash Adams             | AAAd | NESO                               | Workgroup Alternate |
| Bethany Garry         | BG   | DESNZ                              | Government Observer |
| Charles Saywell       | CS   | Aputura Energy                     | Workgroup Member    |
| Charlie von Schmieder | CVs  | Gresham House                      | Workgroup Member    |
| Chris White           | CW   | Research Relay Ltd                 | Workgroup Alternate |
| Ciaran Fitzgerald     | CF   | ScottishPower<br>Renewables        | Workgroup Member    |
| Claire Hynes          | CH   | RWE                                | Workgroup Member    |
| Dayna Rogers          | DR   | NESO                               | Workgroup Observer  |
| Dennis Gowland        | DG   | Research Relay Ltd                 | Workgroup Member    |
| Gareth Williams       | GW   | Scottish Power<br>Transmission     | Workgroup Member    |
| Garth Graham          | GG   | SSE Generation                     | Workgroup Member    |
| Gary Camplejohn       | GC   | Harmony Energy Ltd                 | Workgroup Member    |
| Grant Rogers          | GR   | Q Energy                           | Workgroup Member    |
| Joe Colebrook         | JC   | Innova                             | Workgroup Member    |
| Josh Edwards          | JE   | Aura Power                         | Workgroup Alternate |
| Khamun Ward           | KWa  | Voltwise Power Holdings<br>Limited | Workgroup Alternate |
| Kimbrah Hiorns        | KH   | EDF Power Solutions                | Workgroup Member    |
| Kim Dawson            | KD   | SPEN                               | Workgroup Observer  |
| Kyran Hanks           | KH   | Water Wye                          | Workgroup Member    |
| Lamin Saidy           | LS   | Qair UK                            | Workgroup Member    |
| Laura Henry           | LH   | Eclipse Power Networks             | Workgroup Alternate |

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|-----------------------|-----|------------------------------------|--------------------------|
| Lee Wilkinson         | LW  | On Path Energy                     | Workgroup Member         |
| Lisa Mckay            | LM  | Fidra Energy                       | Workgroup Alternate      |
| Matthew Paige-Stimson | MPs | NGET                               | Workgroup Member         |
| Nathan Stevenson      | NS  | Firstway Energy                    | Workgroup Alternate      |
| Navdeep Singh Gora    | NSg | Northern Powergrid                 | Workgroup Member         |
| Ollie Frankland       | OF  | Electricity Storage Network        | Workgroup Observer       |
| Phillip Pateman       | PP  | Aukera Energy                      | Workgroup Member         |
| Rachael Eynon         | RE  | Roadnight Taylor                   | Workgroup Alternate      |
| Ravinder Shan         | RS  | FRV Powertek Ltd                   | Workgroup Member         |
| Rob Smith             | RSm | ENSO Green Holdings Limited (EGHL) | Workgroup Member         |
| Ross O Hare           | RO  | SSEN                               | Workgroup Member         |
| Shabana Akhtar        | SA  | Ofgem                              | Authority Representative |
| Simon Sheridan        | SS  | NESO SME                           | Workgroup Observer       |
| Tom Palmer            | TP  | Zenobe                             | Workgroup Member         |