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Workgroup Consultation

CMP471: Introduction of a Temporary Completion Date Delay Process

Overview: This modification proposes a temporary, time-bound variation process allowing Users to delay their contracted Completion Dates during the extended Gated Process for Projects with Existing Agreements ([CMP435](#)).

Modification process & timetable



Have 5 minutes? Read our [Executive summary](#)

Have 60 minutes? Read the full [Workgroup Consultation](#)

Have 120 minutes? Read the full Workgroup Consultation and Annexes.

Status summary: The Workgroup are seeking your views on the work completed to date to form the final solution to the issue raised.

This modification is expected to have a: High impact

Users (including Generators and Demand Customers) who have received, or are expecting to receive, a Gate 2 Modification Offer (CMP435), Transmission Owners (TOs), National Energy System Operator (NESO)

Governance route	Urgent modification to proceed under a timetable agreed by the Authority (with an Authority decision)	
Who can I talk to about the change?	Proposer : Matthew Dowds matthew.dowds@muirhallenergy.co.uk	Code Administrator Chair: Teri Puddefoot Terri.Puddefoot@neso.energy
How do I respond?	Send your response proforma to cusc.team@neso.energy by 5pm on 24 July 2026	

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Executive Summary

CMP471 proposes a time-limited opportunity for eligible Users to request a delay to their contracted connection dates. It has been raised in response to the extended Gated Process for Projects with Existing Agreements ([CMP435](#)), also known as the Gate 2 to Whole Queue (G2TWQ) Process. During this period, Users are unable to amend their contracted connection dates, even where project delivery timelines have changed, resulting in contractual dates becoming misaligned with realistic project programmes and exposing Users to disproportionate cost and liability risks.

What is the issue?

During the G2TWQ Process, Users are unable to amend their contracted connection dates, despite changes to project delivery timelines. As the process is expected to extend over a prolonged period, contractual connection dates may become increasingly misaligned with realistic project delivery programmes. This can leave Users in inefficient contractual positions and expose them to disproportionate cost and liability risks.

What is the solution and when will it come into effect?

Proposer's solution: The Proposer's solution is to introduce a temporary, time-bound Completion Date variation process that would allow eligible Users to request a delay to their contracted grid connection Completion Date without submitting a full Gated Application. The process would build on existing NESO contractual mechanisms, restrict eligibility to Users expected to receive a Gate 2 Modification Offer ([CMP435](#)), and permit variations only to the grid connection Completion Date, in accordance with the Gated Modification Guidance. The guidance will be updated to provide supporting information on the circumstances in which a proposed Completion Date Delay Request may not be granted following a TO system impact assessment.

Implementation date: TBC

What is the impact if this change is made?

The modification is expected to deliver benefits for Users, NESO and TOs. It would allow eligible Users to better align their contracted connection dates with realistic project

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delivery timelines, reducing exposure to disproportionate capital contribution, Cancellation Charge liability and Cancellation Charge Secured Amount risks. It should also reduce the need for subsequent contract variations, improving administrative efficiency for NESO and TOs while supporting more accurate network planning and the efficient progression of projects through the Gate 2 process.

Interactions

This Modification does not interact with any other code modifications. However, it is noted that there may be consequential changes required to the System Operator–Transmission Owner Code Procedure (STCP).

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What is the issue?

What is the defect the Proposer believes this modification will address?

Eligible Users face a period of up to 30 months (January 2025 to July 2027) during which they are unable to amend their contracted grid connection Completion Date with NESO. During this period, project delivery timelines may continue to evolve, increasing the potential for misalignment between contracted Completion Dates and realistic project delivery programmes.

This misalignment can create contractual inefficiencies by leaving Users committed to Completion Dates that no longer reflect deliverable project timelines, while limiting their ability to mitigate the associated cost, security and liability risks.

NESO is considering the introduction of a time-limited application window ahead of completion of the G2TWQ Process. However, no mechanism is currently available to enable Users to request a Completion Date delay when receiving a Gate 2 Modification Offer (CMP435).

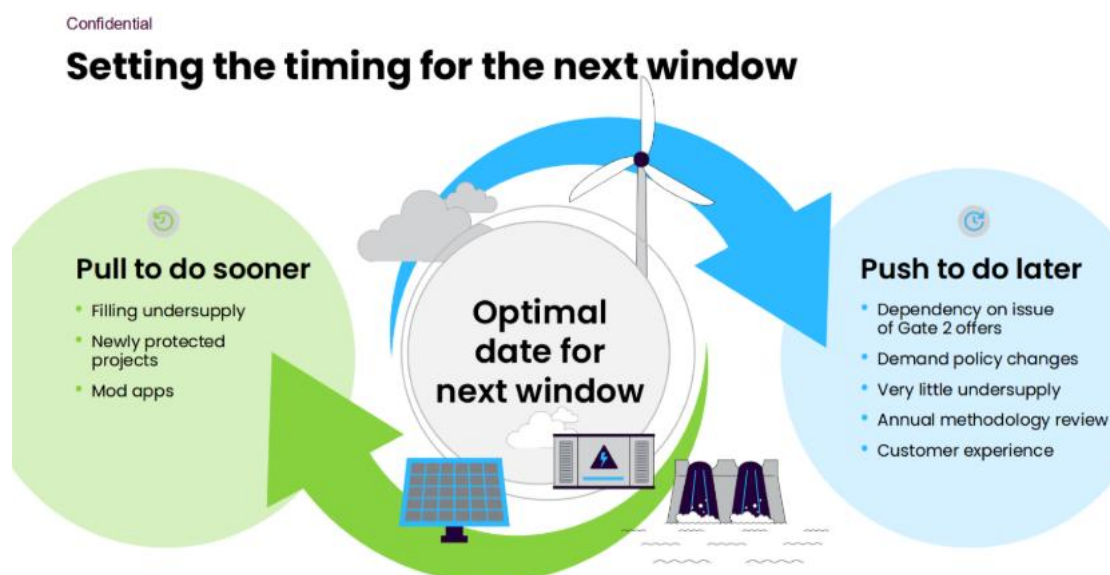


Figure 1: NESO considerations for next Gate Window [1]

In February 2026, NESO confirmed that a limited set of contractual changes to Gate 2 offers would be permitted, including capacity reductions, removal of technology types,

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novation, administrative updates, and termination. These variations are expected to have been granted under NESO's 'Non-Gated Modification Application' process, as set out in its Gated Modification Guidance [2].

While the introduction of a mechanism to enable certain contract changes is welcomed, no provision has been made to allow Users to defer grid connection Completion Dates. Requests to delay Completion Dates for Gate 2 offers are currently classified as 'Gated Modification Applications' and may only be submitted during an open Gated Application Window. As the timing of the first such window ([CMP434](#)) remains uncertain, the ability to request Completion Date deferrals is effectively paused.

In the absence of a functioning mechanism to defer Completion Dates, projects are exposed to increased and uncontrolled cost risks, particularly in relation to securities, liabilities and capital contributions. Where contracted Completion Dates no longer reflect deliverable project timelines, Users face disproportionate cost exposure based on outdated programme assumptions.

This issue has arisen due to the extended duration of the G2TWQ Process and the limited notice provided prior to the pause in NESO's acceptance of grid connection applications in January 2025. As a result, Users were unable to reasonably anticipate the length of the restriction on contractual changes or take steps to align their contracted Completion Dates with evolving project delivery timelines.

Why change?

With the G2TWQ Process now expected to conclude in April 2027, followed by circa three months to stabilise the queue, Users face an extended period of approximately 30 months during which there is limited certainty as to whether their connection date, costs, or point of connection will remain aligned with pre-G2TWQ conditions. In the absence of such certainty, many Developers have been unable to progress projects, particularly in relation to ordering long-lead items, contracting Engineering, Procurement, and Construction (EPC) providers, and securing debt and equity financing, due to unresolved risks. This has placed existing connection dates at risk of becoming unachievable and increases the likelihood of Gate 2 Offer non-acceptance.

The inability to make timely adjustments also creates inefficiencies for both Users and NESO, including the need for multiple subsequent contract variations that could

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otherwise be addressed through a Gate 2 Modification Offer. Based on industry feedback at events and workgroup, the issue is widespread.

Ofgem confirmed in February 2026 that a number of Protected Projects require connection date delays:

"The final lists of affected Protected Projects we received highlighted that across the three TOs, 340 projects qualified for this form of Protection in total. Of these, 210 projects (representing 62% of all projects qualifying) are affected Protected Projects that will have their existing connection date and / or point of connection changed. Whilst our engagement with NESO and TOs into the reason for these changes continues, around 135 of these projects will have their connection dates delayed due to some form of network-driven reason (either solely or jointly with developer delays), with 75 of these projects having their connection dates delayed due to developer-driven Reasons." [3]

In addition, some TOs have interpreted their obligations as requiring them to maintain the Scheme Briefing Note (SBN) connection date provided by NESO, even where this results in projects operating under significant export constraints and where TOs and developers are also unable to meet the SBN connection dates. This further increases the risk of contractual misalignment.

Misalignment between contracted and deliverable Completion Dates may also expose Users to disproportionate costs, particularly in relation to Capital Contributions, securities, and liabilities.

In respect of Capital Contributions, Users may be required to make payments based on contracted Completion Dates that no longer reflect realistic delivery timelines. Where projects are delayed, this can result in capital expenditure being incurred earlier than necessary, before connection assets are required. As a result, a significant proportion of Users may be making Capital Contribution payments against delivery profiles that are no longer aligned with their projects. This issue is not limited to early-phase projects, and it is expected that projects across the 2027–2030 period will also face payment profiles that do not reflect anticipated connection dates.

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This risk is most acute in relation to liability profiles. While securities are fixed prior to Gate 2 acceptance, liabilities continue to accrue against the contracted Completion Date. As a result, Users with a Fixed Cancellation Charge may be required to enter higher liability periods despite known delays to project delivery. Once a liability milestone is reached, Users cannot revert to a previous position, removing an important element of risk management.

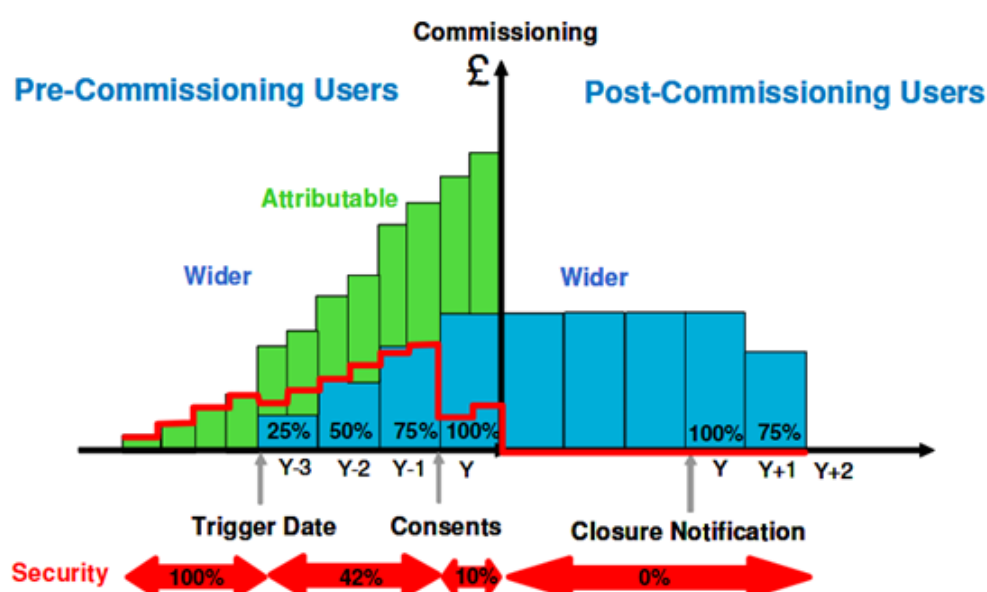


Figure 2: Illustration of Fixed Liability Profile [4]

The next trigger date is 01 April 2027. There is currently no mechanism allowing Users to delay grid connection Completion Dates ahead of this milestone. As a result, Users who have elected to adopt a Fixed Liability Profile may be exposed to increased liabilities that do not reflect deliverable project timelines, whether due to delays in the User's project programme or those arising from TOs. This outcome was not anticipated at the outset of Connections Reform, when it was expected that the first Gated Application Window (CMP434) would open prior to this trigger date.

The inability to amend grid connection Completion Dates therefore results in avoidable inefficiencies, increased cost exposure, and reduced certainty for project development. A targeted mechanism to allow Completion Date delays is therefore required to address these issues.

The Original proposal form can be found in **Annex 01**.

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What is the solution?

Proposer's Original solution

The proposal is to amend Sections 11, 17 and 18 of the CUSC to introduce a limited, time-bound grid connection Completion Date variation process.

This process would allow Users to request a delay to their contracted grid connection Completion Date during the interim period, without the need to submit a full Gated Application.

The proposed Completion Date delay process would be implemented via a Modification Application, in addition to the range of changes currently permitted by NESO, including:

- Request a decrease of Connection Entry Capacity (CEC), Transmission Entry Capacity (TEC), Developer Capacity, Demand MW or Installed Capacity
- Remove a tech type
- Novation
- Address details or admin changes
- Terminate

Following receipt of a Gate 2 Modification Offer, a User may submit a Completion Date Delay Request within 10 Business Days of implementation of CMP471. The User would not be required to accept the offer and may instead request a limited set of changes to the Gate 2 Modification Offer. The Completion Date delay process would be available for 20 Business Days following receipt of the Gate 2 Modification Offer, after which NESO and the relevant TO would determine whether the request can be accommodated.

Where Users are unable to utilise the proposed Completion Date Delay Request process having already received or accepted a Gate 2 Modification Offer, they will have a further opportunity to submit a Connection Date Delay Request to NESO no later than 30 Business Days following the CMP471 implementation date. This ensures that all eligible Users have a reasonable opportunity to align their contractual connection dates ahead of the April 2027 liability trigger period.

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Any delay request must fall within defined network impact limits, which will be set out in updated Gated Modification Guidance. The guidance will specify the circumstances in which a Completion Date Delay Request may not be granted following a TO assessment. Where a request is refused, TOs and NESO will be required to provide justification and, where feasible, propose an alternative connection date.

These processes introduce a targeted mechanism that improves alignment between contractual positions and project delivery timelines, while enhancing administrative efficiency for NESO and TOs during the ongoing G2TWQ Process.

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The three Gate 2 contract scenarios have been outlined in the table below –

Contractual Position when CMP471 is Implemented	Not received Gate 2 Offer	Received Gate 2 Offer – Not Yet Accepted	Gate 2 Offer Accepted
CMP471 Solution	Before receiving a Gate 2 Modification Offer, a User should submit written notice to NESO indicating their intention to request a Completion Date delay. Where a User has not received a Gate 2 Modification Offer by 10 Business Days after the CMP471 Implementation Date, the User may submit a Completion Date Delay Request within 20 Business Days of receiving the Gate 2 Modification Offer. The User is not required to accept the Gate 2 Modification Offer before requesting a Completion Date delay. Upon receipt of the Completion Date Delay Request, NESO will engage with the relevant TO(s) to assess whether the requested revised Completion Date can be accommodated. NESO and the relevant TO(s) must complete the assessment and, where the request can be accommodated, issue a revised Modification Offer within 60 Business Days.	Where CMP471 has been implemented, a User who has received, but not accepted, a Gate 2 Modification Offer may submit a Completion Date Delay Request. The request must be submitted no earlier than 10 Business Days after the CMP471 Implementation Date and no later than 30 Business Days after the CMP471 Implementation Date. The User is not required to accept the Gate 2 Modification Offer before requesting a Completion Date delay. Upon receipt of the Completion Date Delay Request, NESO will engage with the relevant TO(s) to assess whether the requested revised Completion Date can be accommodated. NESO and the relevant TO(s) must complete the assessment and, where the request can be accommodated, issue a revised Modification Offer within 60 Business Days.	Where a User has already accepted its Gate 2 Modification Offer by the time CMP471 is implemented, the User may, in respect of the associated Gate 2 Existing Agreements, submit a Completion Date Delay Request to NESO no earlier than 10 Business Days following the CMP471 Implementation Date and no later than 30 Business Days following the CMP471 Implementation Date. Upon receipt of the Completion Date Delay Request, NESO will engage with the relevant TO(s) to assess whether the requested revised Completion Date can be accommodated. NESO and the relevant TO(s) must complete the assessment and, where the request can be accommodated, issue a Modification Offer within 60 Business Days. Where items such as Queue Management Milestones or security and liability charges require updating, such items shall be treated as though they had formed part of the original Gate 2 Modification Offer, so as not to disadvantage a User for having accepted its Gate 2 Modification Offer prior to CMP471 implementation.
TO / NESO Impact Considerations	It is expected that Completion Date delays will only be granted where there is an acceptable impact on network reinforcement requirements and no material adverse impact on other Users. The proposal permits only the deferral of existing Completion Dates and does not introduce additional capacity or material system impact. TOs will therefore need to assess each submission to determine whether the requested delay		

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	can be accommodated within these parameters. Such delays are also expected to benefit TOs by improving the accuracy of future generation delivery assumptions across the network and enhancing overall planning and process efficiency. Where a requested Completion Date cannot reasonably be supported, NESO and the relevant TO(s) should work collaboratively with the User to identify the next most appropriate deliverable Completion Date and provide a clear and transparent explanation of the factors preventing the requested date from being accommodated. NESO and the TO(s) will provide a decision within 60 Business Days following submission of the Completion Date Delay Request.
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NESO's Gated Modification Guidance [2] would require a temporary amendment to introduce a "CMP471 – Completion Date Delay Request" as a Non-Gated Modification. This would enable Users to request a grid connection Completion Date delay prior to acceptance of a Gate 2 Modification Offer.

Following completion of the CMP471 process, the "CMP471 – Completion Date Delay Request" would be removed and would no longer be available within the Gated Modification Application framework.

It is critical that Users are able to request a Completion Date delay prior to acceptance of a Gate 2 Modification Offer, as acceptance triggers the commencement of securities and liability exposure. Allowing Users to align contractual Completion Dates before acceptance would therefore reduce the risk of entering disproportionate liability positions that do not reflect achievable project delivery timelines.

Provision should also be made for Users who are unable to utilise the initial request window. In such cases, requests submitted through the interim process should result in the same securities and liability position as if the request had been made prior to acceptance of the Gate 2 Modification Offer.

Workgroup Consultation question 7: What submission mechanism (post offer negotiation or a formal modification application route) is most appropriate to process a Completion Date Delay Request for Users that have not accepted a Gate 2 Offer?

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Workgroup considerations

The Workgroup convened 05 times to discuss the issue as identified by the Proposer within the scope of the defect, develop potential solutions, and evaluate the proposal in relation to the Applicable Code Objectives.

Workgroup Discussion ahead of the Workgroup Consultation

The Workgroup held an initial discussion on CMP471, which focused on understanding the defect, assessing the proposed solution, and identifying key risks, dependencies, and areas requiring further clarification.

Validation of the Defect and Need for Intervention

Workgroup members broadly recognised the issue that current processes may prevent Users from aligning contractual grid connection Completion Dates with realistic project delivery timelines. It was noted that this misalignment could result in increased costs, inefficient contract management, and inaccurate system planning data. However, there was discussion around whether the defect is fully evidenced, particularly given uncertainty over whether existing processes (or pragmatic engagement between Developers and TOs) could already address some of these issues. Clarification from Ofgem and TOs was identified as critical to confirm whether current rules require the offer of the earliest possible grid connection Completion Date and whether delays can already be accommodated.

The Workgroup broadly recognised that the need for grid connection Completion Date flexibility has arisen as a consequence of the extended timelines associated with the GT2WQ Process. Workgroup members noted that delays in the issuance of Gate 2 Modification Offers have created uncertainty for projects, impacting financial decisions, procurement activities and delivery programmes. As such, there was a general view that the delays being requested are not purely User-driven, but instead reflect wider reform-driven impacts that have affected the feasibility of progressing projects in line with original expectations.

There was also general agreement that the issue is largely specific to the current so called “Gate 2 to Whole Queue” process, and is expected to represent a time-limited scenario rather than a recurring issue in future Gated Design Processes where timelines and expectations are more clearly defined.

Interpretation of the CUSC and the NESO and TO Licence obligations

A significant theme was uncertainty regarding the current interpretation of the Connection and Use of System Code (CUSC) and associated guidance.

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In conversation it emerged that different TO's had a different view on the level of flexibility they had with accommodating requests to amend the connection date of projects when they were issued their G2TWQ offers. One TO suggested that when discussing the connection, prior to sending the offer to NESO to be issued to the User, if the User indicated they would no longer be able to meet, or be at risk of missing, the connection date in the original Bilateral Connection Agreement (BCA), the TO would explore whether they could accommodate a connection date change. This was very much caveated that this would not be considered if it detrimentally impacted other networks Users connection agreements. However, two TO's indicated that they were licence bound (Transmission Standard Licence Conditions D4A and D18) , if possible, to offer the connection date stipulated in the pre connection reform connection agreement. They stated they had no flexibility to make any amendments to the date even if doing so had no impact on network costs or impacts on other Users in the queue.

Some Workgroup members questioned this as it seemed to be at odds with Ofgem messaging on this point that indicated that TO's & NESO should work with Developers to see how they might accommodate their connections in light of the significant pause created by connection reform and the associated project delivery risk.

Other Workgroup members questioned how different TO's could have such a different interpretation of their licence given certain interpretations could considerably increase the risk of project failure.

The Workgroup asked if Ofgem could provide some clarity of their expectation on how TO's would handle this point. They felt if Ofgem could provide some comfort to the TO's that they would be more comfortable applying a degree of pragmatism to aligning connection dates with project realities. Clarity is still required on this.

Some Workgroup members suggested that the issue may be resolved through changes to guidance or clarification from Ofgem, rather than a full code modification. Possible alternative approaches were discussed, including redefining grid connection Completion Date delays as non-gated applications or using existing mechanisms more flexibly. The Workgroup agreed that further clarity from Ofgem and TOs is required to determine whether CMP471 is necessary or whether a simpler solution could address the issue.

TOs provided statements on their interpretation of the CUSC and Licence obligations and these can be found in **Annex 05**.

The Workgroup noted that Ofgem provided some initial foresight on matters that were of relevance and helpful to the Workgroup's deliberations in respect of interpreting the CUSC; following Workgroup Meeting 5, Ofgem then advised their current position is that

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the statement should not be included in the Workgroup Consultation at this stage while internal consideration is ongoing. In light of this the statement has not been included in the Workgroup Consultation.

Scope and Nature of the Proposed Solution (Temporary vs Enduring)

There was general agreement that the proposal should be a targeted, time-limited intervention, rather than an enduring mechanism to allow for grid connection Completion Date delay requests. Discussion centred on ensuring the solution remains tightly scoped to avoid unintended consequences, with particular support for a defined application window and restrictions on use. Concerns were raised that broad or enduring changes could create complexity or conflict with existing processes.

Impact on Network Planning, Queue Management and Fairness

A key area of debate was the potential impact of grid connection Completion Date delays on network planning and queue management.

Some Workgroup members were of the view that delays would not materially affect network design or reinforcement requirements.

Others highlighted potential risks, including changes in construction sequencing, local network constraints, or interactions between projects connecting to the same infrastructure.

It was agreed that User Progression Milestones (also known as Queue Management Milestones) would act as a natural constraint on excessive delays. CUSC Section 16 (User Progression Milestones) does not apply to Modification Offers, except for the CMP435 exception on M1, which means the User Progression Milestones will not be updated when a User requests a delay. **Annex 06** provides more detail on this topic.

It was also highlighted that there is an existing right for Users to directly request a day for day extension to User Progression Milestones M5–M8, in relation to the G2TWQ programme, as per Queue Management Guidance “G2tWQ Exception”.

There were also concerns around fairness, including the possibility that Users could exploit the process to delay projects strategically. The Workgroup generally considered that existing contractual obligations and milestones would mitigate this risk, but noted that this should be made explicit.

Resource and Delivery Implications for TOs and NESO

Workgroup members highlighted uncertainty regarding the scale of the issue and the potential volume of requests. NESO has invited Users to submit an interest in delaying

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their connection date, amongst other things, in a Mod App change scoping exercise on 24 June 2026. It was made clear that this data would be made available to the CMP471 Workgroup during the Webinar held on 25 June 2026.

TOs noted that even a temporary window could create significant resourcing pressure, particularly given ongoing Connections Reform work.

There is currently no clear quantification of how many projects may seek to delay connection dates.

It was acknowledged that without this visibility, it is difficult to fully assess the operational impact, including potential effects on the Joint Industry Plan (JIP) timelines.

The Workgroup agreed that further engagement with TOs and potentially NESO is required to better understand the scale and operational implications.

Operational Complexity and System Impacts

TOs and other Workgroup members were of the opinion that accommodating grid connection Completion Date delay requests may involve significant operational complexity. Requests would require detailed, case-by-case assessment, taking into account factors such as outage planning, commissioning resource, infrastructure constraints and interactions with other users connected to the same site.

It was suggested that even relatively small delays could have wider impacts on other projects, particularly in locations where multiple connections are sequenced or delivered in close proximity. As a result, the feasibility of accommodating delay requests cannot be generalised and would depend heavily on site-specific conditions. Some Workgroup members also recognised that the process could be resource-intensive for both TOs and NESO, particularly if a high volume of requests is received. Other Workgroup members felt that this may not be the case and by introducing the proposed Connection Date Delay Request this would form a more efficient application process for TOs.

Other Workgroup members recognised that whilst this may be resource intensive this increase in effort should not be considered in isolation and evaluated in how it may better meet CP30 targets.

Workgroup Consultation question 8: Would you anticipate using the Connection Date Delay process to change your Gate 2 modification Offer?

Workgroup Consultation question 9: If yes to question 8, for what reasons?

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Interaction with Connections Reform and Wider Policy Considerations

Some Workgroup members raised concerns about the interaction with the GT2WQ Process and delivery timelines. While some noted that correcting misaligned grid connection Completion Dates sooner may improve transparency and planning outcomes, others highlighted risks to existing timelines and commitments.

It was recognised that these considerations extend beyond the Workgroup and fall within Ofgem's wider decision-making role. However, the importance of capturing these impacts clearly in the Workgroup Report and consultation was emphasised.

The potential impact on the wider GT2WQ Process, including the Joint Industry Plan, was identified as a key area of concern. Workgroup members noted that a material number of delay requests could affect underlying engineering assumptions, connection procurement assumptions, and the coordination of projects across delivery phases.

There was a risk that significant changes could introduce knock-on impacts for other Users, including potential delays in the issuance of future Gate 2 offers. While the extent of these impacts would depend on the volume and scale of delay requests, the Workgroup agreed that this risk would need to be carefully considered and managed.

Interaction with existing NESO Guidance documents

Potential interactions were identified with both the NESO's Gated Modification Guidance (in particular for projects which have already signed a Gate 2 Modification Offer, and entered into a Gate 2 Existing Agreement – and that these should be treated as Non-Gated Modification Applications) and NESO's Queue Management Guidance (in particular the "G2tWQ Exception").

A Workgroup member suggested that it may be prudent to draft any consequential changes to these documents in conjunction with development of CMP471, such that these proposed changes could be circulated with Code Administrator Consultation, with a plan to directly implement such changes should the proposed modification be approved. The proposed draft of these can be found in **Annex 07** – Draft Gated Modification Guidance and **Annex 08** – Draft NESO's Queue Management Guidance.

Workgroup Consultation question 10: Do you believe the legal text is sufficiently clear without requiring supporting information within the Gated Modification Guidance?

Workgroup Consultation question 11: Would you propose any variations to the supporting information within the updated Gated Modification and Queue Management Guidance (see Annex 7 and 8)?

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Interaction with NESO's "Mod App change scoping exercise" issued 24 June 2026.

Workgroup members had discussion on 24 June 2026, following receipt of NESO's Mod App change scoping exercise, to understand any interaction between this process, and CMP471.

Workgroup members observed that while NESO stated the process is *"for information gathering only"*, it also (rather inconsistently) stated *"We will use the insights gathered to assess what may be feasible and sustainable ahead of future gated windows, and to ensure any next steps are informed by customer need. This is intended as a one-time scoping exercise to understand the scale of requested changes, so customers must tell us now if they wish to make a change. Any requests made later cannot be incorporated outside of the usual mod app process"* – implying that the submissions may be used to process changes.

Workgroup members concluded that while NESO's announcement indicated a potential mechanism which could achieve similar results to CMP471 in relation to providing the opportunity to request a Completion Date delay, there were no obligations or commitments being offered, and as such it would make sense to continue developing legal text.

A Workgroup member suggested that the CUSC Section 18 draft legal text could cross reference this information gathering exercise as a relevant way to provide early notice of a desire to delay a project's completion date.

Process Design and Implementation Mechanism

In considering the design of the proposed process, the Workgroup discussed how and when Users should be able to submit grid connection Completion Date delay requests. The proposal envisages that Users could either submit a request within a defined period following receipt of a Gate 2 Modification Offer, or utilise a specific one-off window for projects that have already progressed beyond that point.

While there was support for providing a defined opportunity to submit requests, the Workgroup highlighted the need for further clarity on how the process would function in practice. In particular, uncertainty remains around whether a Gate 2 Modification Offer must be signed before a request is submitted, and whether the mechanism should be implemented through a simplified variation process or a formal modification application. It was acknowledged that the appropriate approach may differ depending on contractual status, and that further input from NESO is required to confirm the end-to-end process and internal handling arrangements.

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The Proposer confirmed their intention that a Gate 2 Modification Offer should not need to be signed in order for a delay request to be submitted. The Original solution has been developed on that basis.

Regulatory and Incentive Considerations

Regulatory and incentive considerations were identified as a further area requiring clarification. It was noted that existing incentive frameworks may constrain the ability of TOs to accommodate delays without incurring financial penalties, particularly where delays are classified as network-driven.

Workgroup members highlighted the importance of ensuring that the treatment of delays reflects their underlying cause, particularly where they arise from the GT2WQ Process rather than project-specific actions. Engagement with Ofgem and other relevant stakeholders was identified as necessary to clarify how such delays should be treated within existing regulatory frameworks and to ensure that implementation of the proposal does not create unintended consequences.

Role of Ofgem and Need for Early Engagement

There was strong consensus that early engagement with Ofgem is essential to the progression of the modification.

Workgroup members noted that Ofgem's view on:

- the current interpretation of the rules,
- the scale of the defect, and
- the acceptability of the proposed solution

Clarity on these points will be critical in determining how CMP471 can progress.

The Workgroup agreed that Ofgem input should be sought ahead of subsequent meetings to avoid progressing a solution that may ultimately not be approvable.

At the point of going to Workgroup Consultation Ofgem have yet to attend Workgroup to provide clarity on points raised.

Treatment of Embedded (Distribution-Connected) Projects

The Workgroup briefly considered whether the proposal should apply to embedded generation. The initial view was that distribution-connected projects may not require access to this process, as their connection agreements already provide flexibility beyond the earliest connection date. One Workgroup member stated that the date provided in the agreements between Distribution Networks and NESO is the earliest date that an Embedded project can have firm access to the transmission network. Embedded

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projects can connect after this earliest date without the need for the Distribution Network to request a delay from NESO. Note that some Embedded projects can connect before the earliest firm access date by accepting operational constraints such as Technical Limits.

Some Workgroup members noted that Distribution Networks need to update Embedded project connection dates for the purpose of calculating the Cancellation Charge (liabilities) and Cancellation Charge Secured Amount (securities). It was agreed that this can be done by updating Appendix G Schedule 1, as per clause 10 of the Appendix G Schedule 2 within Schedule 2 Exhibit 1A of the CUSC. The update to Appendix G Schedule 1 can be done by notifying the NESO via email and it does not require a Modification Application.

Therefore, all Workgroup members agree that Embedded Projects are out of scope of CMP471.

Workgroup Consultation question 12: Are there any ramifications from excluding Distribution Network Operator (DNO) embedded projects that are not already catered for in the separate connections process?

Considerations around possible April 2027 securities trigger delay

The NESO Presenter provided an overview of work being undertaken by NESO in response to feedback received through CMP471. It was explained that some customers have expressed concerns about the additional security requirements due in April 2027 for projects connecting in 2030/31, and that these financial pressures may be contributing to requests to delay connection dates ahead of future application windows (**Annex 09**).

To explore whether this issue could be addressed, NESO is investigating the possibility of delaying the requirement to post security for Wider Works Cancellation Charges for affected projects. The Workgroup understood the concept being assessed would allow eligible customers with connection dates between 1st April 2030 and 31st March 2031 to freeze securities for an additional 12 months. The Presenter stressed that this is only being investigated at this stage and no decision has been made. The underlying liability would remain; only the timing of the security requirement would potentially change.

The aim of the possible work is to reduce short-term financial pressure on developers, support investor confidence, and potentially reduce the need for customers to seek connection date changes before the next application window.

It was advised that NESO is currently assessing the impacts across processes, systems, people, and fairness considerations. Ofgem has been given early sight of the concept, as

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changes may interact with existing CUSC provisions relating to wider works cancellation charges. Discussions with Ofgem are ongoing.

The Presenter expects to reach a view by around the end of July 2026, with options ranging from proceeding with the proposal, implementing a modified version, or not taking it forward, subject to the necessary internal governance and approval processes.

Workgroup members were generally supportive of NESO exploring the proposed security deferral, recognising that it could provide some relief for a subset of customers impacted by upcoming security requirements. However, there was broad agreement that the proposal would only address a specific element of the issue that CMP471 is seeking to resolve and should be viewed as a complementary measure rather than an alternative to the modification itself.

Discussion focused on how the proposal would work in practice, particularly around trigger dates, wider works cancellation charges, and how projects that subsequently change their connection dates would be affected. The Presenter clarified that the proposal would defer the requirement to post security, but would not remove or reduce the underlying liability. Workgroup members also explored potential interactions with CMP470 (if approved), noting that future security arrangements under that modification could reduce the effectiveness of the proposal for some projects.

Some concerns were raised about fairness, as limiting the relief to projects within a particular connection date range could create differences in treatment between customers with similar circumstances. However, Workgroup members generally felt there was little downside to investigating the option further, provided the impacts and scope were carefully considered.

Overall, the Workgroup's view was that the proposal could be a useful supporting measure to alleviate financial pressures on some affected customers, but it would not fully address the broader issues that had led to CMP471 being raised. The Workgroup encouraged NESO to continue its assessment and welcomed opportunities to provide further feedback as the proposal develops.

Workgroup Consultation question 13: If the NESO securities delay proposal were to be progressed could it potentially resolve the concerns in relation to your relevant projects, or do you feel that a date change mechanism proposed with CMP471 would be more useful in respect of your projects ?

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Consideration of other options

The Workgroup discussed that the proposed Original solution does not include any requirement for NESO to respond to a grid connection Completion Date delay request. There was inconclusive discussion regards whether there should be a defined process for NESO and TOs to follow, on receipt of such a request.

There was discussion with regards to whether there should be provision for consequential updates to Appendix J Construction Programme within the scope of the modification. This currently is not included in the scope of the Original solution.

Workgroup consultation question 14: The Original proposal includes 60 Business Days for NESO to respond to a Connection Date Delay Request. Do you believe this is: a) too long, b) about right, or c) too short – and why?

Workgroup consultation question 15: In CUSC 18, there is currently no proposed legal text describing the interaction between a Gate 2 Modification Offer validity period (3 months) and a Connection Date Delay Request which is made within that period. Do you believe there should be explicit drafting on this topic, and what that relationship should be?

Workgroup consultation question 16: Do you perceive any benefits or drawbacks to not including explicit provision for consequential updates to the Appendix J Construction programme in line with any delay to the Completion Date arising from this mechanism?

Draft legal text

The draft legal text for this change can be found in **Annex 04**.

The Workgroup reviewed draft legal text and identified a number of areas for further development to ensure clarity and consistency. Members discussed whether the provisions should sit within existing CUSC sections relating to application processes or contractual arrangements, or whether a more consolidated approach would be preferable.

There was a clear view that the drafting should remain proportionate and targeted to the issue being addressed. Concerns were raised regarding the use of fixed calendar-based windows within the legal text, with a preference expressed by some Workgroup members for timelines linked to implementation dates to provide greater flexibility and reduce the risk of misalignment with programme delivery.

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The following points were considered when creating the draft legal text:

- **Inclusion of a Connection Completion Date Delay request “Window” definition in CUSC 11:** Following Workgroup discussion a specific definition for a delay window was removed, instead the legal text with Section 17 and 18 was updated to clearly distinguish between Users who can submit a delay request following receipt of a Gate 2 Modification Offer or a User who needs a separate process having already accepted their Gate 2 Existing Agreement.
- **Scope of CUSC 17 proposed legal text:** Should only be in relation to Gate 2 Modification Offers already accepted (Gate 2 Existing Agreements) and therefore requiring a Modification Application: Following agreement to remove the completion date window, it was agreed that Section 17 should focus on developing a process for Gate 2 Existing Agreements.
- **Scope of CUSC 18 proposed legal text:** Should only be in relation to Gate 2 Modification Offers not yet accepted. Following agreement to remove the completion date window, it was agreed that Section 18 should focus on developing a process for Gate 2 Modification Offers.
- **Whether there should be inclusion of drafting relating to User Progression Milestones:** It was agreed that it may be beneficial to introduce text within the Queue Management Guidance to assist Users in understanding the interaction between the proposed Legal Text and their Gate 2 Modification Offer.
- **Role of NESO vs Role of TOs in determining outcomes:** As the User has a contract directly with NESO, who are bound by the CUSC, there is a concern that the consequences of this modification places obligations on the TO that cannot be directly enforced by the CUSC. The legal text attempts to tie both NESO and the TOs as having responsibility to determine and justify outcomes from completion date delay requests and where possible offer an alternative date.

Workgroup Consultation question 17: Do you perceive any interactions with commercial frameworks, such as Government’s Contract for Difference (CfD) or Capacity Market (CM)?

Workgroup Consultation question 18: Do you agree that 20 Business Days after receipt of a relevant Offer, or 20 Business Days beginning 10 days following the Implementation Date is sufficient to submit the required Completion Date notices to NESO?

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What is the impact of this change?

CMP471 will mainly impact eligible Users with Gate 2 Modification Offers, NESO and TOs. It would allow Users to request a temporary delay to contracted grid connection Completion Dates before or shortly after Gate 2 offer acceptance, helping align contracts with realistic project timelines and reduce exposure to disproportionate liabilities, securities and capital contributions. Positive impacts include improved project certainty, more accurate network planning and reduced future contract variation activity. Potential negative impacts include additional short-term workload for NESO and TOs, possible operational complexity where delays affect network sequencing, and risk of knock-on impacts if a high volume of requests is received.

Original Proposer's assessment against Code Objectives

Proposer's assessment against CUSC Non-Charging Objectives	
Relevant Objective	Identified impact
(i) The efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence*;	Positive The modification supports the efficient discharge of NESO's licence obligations by improving the alignment between Users' contractual positions and deliverable project parameters ahead of the Gated Application Window. By expanding the limited Gate 2 offer adjustments, the proposal reduces the need for multiple post-Gate 2 contract acceptance variations and associated administrative processes. This improves the efficiency and effectiveness of the connection's framework during the GT2WQ Process.
(ii) Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the	Positive The modification facilitates effective competition by ensuring that Users enter the Gate 2 process based on accurate and current project assumptions. In the absence of this change, Users may face distorted incentives due to outdated contractual

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sale, distribution and purchase of electricity;	positions and associated liabilities, which could influence decisions to accept or reject Gate 2 Modification Offers. By improving alignment between contractual arrangements and project readiness, the proposal supports a more level and efficient competitive environment.
(iii) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency **; and	Neutral The modification does not materially impact compliance with the Electricity Regulation or any relevant legally binding decisions. It introduces a procedural adjustment within the existing CUSC framework and does not affect cross-border trade, market coupling, or balancing arrangements.
(iv) Promoting efficiency in the implementation and administration of the CUSC arrangements.	Positive The modification promotes efficiency in the implementation and administration of the CUSC by introducing a controlled mechanism for contract alignment prior to the Gated Application Window. Without this process, Users are likely to submit subsequent contract variations following Gate 2 acceptance, increasing administrative burden on NESO and TOs. By enabling a single, time-bound adjustment, the proposal reduces complexity, improves data quality for network planning, and streamlines contract management during a critical transition period.

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories

Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Neutral The modification is not expected to have a direct impact on system safety or reliability. However, by enabling more accurate alignment between

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	contractual positions and deliverable projects, it may indirectly improve the quality of information available to NESO, supporting more reliable system planning assumptions.
Lower bills than would otherwise be the case	Neutral The modification is not expected to have an immediate direct impact on consumer bills. However, by reducing the risk of inefficient project outcomes, such as non-acceptance of Gate 2 Modification Offers due to misaligned liabilities, it supports more efficient deployment of generation. Over time, this may contribute to downward pressure on system costs and consumer bills.
Benefits for society as a whole	Positive The modification supports the efficient delivery of generation projects by reducing contractual misalignment and associated risks. This increases the likelihood of projects progressing through Gate 2 and reaching delivery, supporting security of supply and reducing reliance on higher-cost or carbon-intensive generation sources.
Reduced environmental damage	Positive By improving investor certainty and enabling more accurate contractual arrangements, the modification supports the timely delivery of low-carbon generation projects. This contributes to the achievement of net zero targets and reduces reliance on fossil fuel generation, resulting in positive environmental outcomes.
Improved quality of service	Positive The modification improves quality of service for Users by reintroducing a controlled mechanism to amend contractual positions during an otherwise restricted period. This ensures that connection agreements more accurately reflect project status, providing greater transparency, flexibility, and certainty within the connections process.

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When will this change take place?

Implementation date

10 Business Days after an Authority decision.

Date decision required by

TBC

Implementation approach

Changes will be required to Sections 11, 17 and 18 of the CUSC, alongside updates to the NESO systems and portal to enable submission and processing of grid connection Completion Date variation requests.

Interactions

☒ CUSC	☐ BSC	☒ STC	☐ SQSS
☐ European Network Codes	☐ EBR Article 18 T&Cs ¹	☐ Other modifications	☐ Other

This modification affects CUSC Section 11, 17 and 18.

How to respond

Standard Workgroup Consultation questions

1. Do you believe that the Original Proposal better facilitate the Applicable Objectives versus the current baseline?
2. Do you support the proposed implementation approach?
3. Do you have any other comments?
4. Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider?
5. Does the draft legal text satisfy the intent of the modification?
6. Do you agree 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 Code?

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Specific Workgroup Consultation questions

7. What submission mechanism (post offer negotiation or a formal modification application route) is most appropriate to process a Completion Date Delay Request for Users that have not accepted a Gate 2 Offer?
8. Would you anticipate using the Connection Date Delay process to change your Gate 2 modification Offer?
9. If yes to question 8, for what reasons?
10. Do you believe the legal text is sufficiently clear without requiring supporting information within the Gated Modification Guidance?
11. Would you propose any variations to the supporting information within the updated Gated Modification and Queue Management Guidance (see Annex 7 and 8)?
12. Are there any ramifications from excluding DNO embedded projects that are not already catered for in the separate connections process?
13. If the NESO securities delay proposal were to be progressed could it potentially resolve the concerns in relation to your relevant projects, or do you feel that a date change mechanism proposed with CMP471 would be more useful in respect of your projects?
14. The Original proposal includes 60 Business Days for NESO to respond to a Connection Date Delay Request. Do you believe this is: a) too long, b) about right, or c) too short – and why?
15. In CUSC 18, there is currently no proposed legal text describing the interaction between a Gate 2 Modification Offer validity period (3 months) and a Connection Date Delay Request which is made within that period. Do you believe there should be explicit drafting on this topic, and what that relationship should be?
16. Do you perceive any benefits or drawbacks to not including explicit provision for consequential updates to the Appendix J Construction programme in line with any delay to the Completion Date arising from this mechanism?
17. Do you perceive any interactions with commercial frameworks, such as Government's Contract for Difference (CfD) or Capacity Market (CM)?
18. Do you agree that 20 Business Days after receipt of a relevant Offer, or 20 Business Days beginning 10 days following the Implementation Date is sufficient to submit the required Completion Date notices to NESO?

The Workgroup is seeking the views of CUSC Users and other interested parties in relation to the issues noted in this document and specifically in response to the questions above.

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Please send your response to cusc.team@neso.energy using the response pro-forma which can be found on the [CMP471 modification](#) page.

In accordance with Governance Rules if you wish to raise a Workgroup Consultation Alternative Request please fill in the form which you can find at the above link.

If you wish to submit a confidential response, mark the relevant box on your consultation proforma. Confidential responses will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel, Workgroup or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BCA	Bilateral Connection Agreement
BSC	Balancing and Settlement Code
CM	Capacity Market CM
CEC	Connection Entry Capacity
CP30	Clean Power 30
CUSC	Connection and Use of System Code
DNO	Distribution Network Operator
EBR	Electricity Balancing Regulation
EPC	Engineering, Procurement and Construction
GC	Grid Code
G2tWQ	Gate 2 to Whole Queue
CfD	Government's Contract for Difference
JIP	Joint Industry Plan
MW	Megawatt
NESO	National Energy System Operator
SBN	Scheme Briefing Note
SQSS	Security and Quality of Supply Standards

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STC	System Operator Transmission Owner Code
T&Cs	Terms and Conditions
TEC	Transmission Entry Capacity
TO	Transmission Owner

Reference material

- [1] <https://www.neso.energy/document/360671/download>
- [2] <https://www.neso.energy/document/360456/download>
- [3] <https://www.ofgem.gov.uk/sites/default/files/2026-02/Ofgem-Response-on-Protected-Projects-Relief-Request.pdf>
- [4] <https://www.nationalgrid.com/sites/default/files/documents/5638-CMP192%20Updated%20Guidance%20Document.pdf>

Annexes

Annex	Information
Annex 01	CMP471 Proposal form
Annex 02	CMP471 Terms of reference
Annex 03	CMP471 Urgency letter
Annex 04	CMP471 Draft Legal Text
Annex 05	CMP471 Interpretation of CUSC and Licence Obligations
Annex 06	CMP471 Appendix Q Clarifications Innova Summary
Annex 07	CMP471 Draft Gated Modiciation Guidance
Annex 08	CMP471 NESO's Queue Management Guidance

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Annex 09	Considerations around possible April 2027 securities trigger delay
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