

Public

Code Administrator Meeting

Summary

Workgroup Meeting 7 – CMP471: Interim Connection Date Delay Process Ahead of CMP434 Gated Application Window

Date: 30/07/2026

Contact Details

Chair: Robert Hughes, Robert.Hughes3@neso.energy

Proposer: Matthew Dowds, matthew.dowds@muirhallenergy.co.uk

Key areas of discussion

The Workgroup reviewed consultation responses to CMP471 and focused on whether a dedicated Connection Date Delay Request process remains necessary ahead of the CMP434 gated application window. Key discussion points included the appropriate route for submitting requests, the interaction between delay requests and Gate 2 Offer acceptance periods, and whether post-offer negotiation alone would provide sufficient clarity and consistency for users, NESO and TOs.

The Workgroup also considered the supporting arrangements that would be needed if CMP471 progresses, including updates to legal drafting, guidance, Appendix J Construction Programmes and process implementation arrangements. Workgroup Members agreed that further clarity is required on eligibility, evidence requirements, decision-making, request volumes, system readiness and the relationship with wider commercial frameworks, while noting that the NESO securities delay proposal may provide some benefit but does not remove the need for CMP471.

Next: Next steps are to close out outstanding actions and use the next meeting to resolve any remaining issues. Workgroup 9 will review the draft Workgroup Report, with Workgroup 10 expected to finalise the report, agree the workgroup position and complete the vote.

Ofgem Slot

Ofgem confirmed that its role in future workgroups will be to observe the discussion and respond to questions, rather than actively present or lead agenda items. Future workgroup meetings will include a dedicated Ofgem slot to allow workgroup members to raise questions. Ofgem also noted that, due to current legal team resource constraints, it is still considering its view on the interpretation of licence conditions and existing arrangements. An update will be shared once this position has been confirmed.

Public

Workgroup Consultation Responses

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?

The Workgroup considered the mechanism for processing Completion Date Delay Requests for users that have not accepted a Gate 2 Offer. The discussion focused on whether the process should rely on post-offer negotiation, a formal modification application route, or a combination of both.

The Proposer noted that pre-offer engagement is already encouraged but considered that a clear direct request route may be required as a formal backstop where post-offer negotiations do not resolve the issue. Workgroup Members also noted that Ofgem's view would be important in determining whether a post-offer negotiation approach would be acceptable from a regulatory perspective.

Workgroup Members noted that post-offer negotiation could reduce administrative burden compared with formal modification applications but emphasised that any process would need to be practical for TOs and NESO to administer. The main concern was the potential impact on the delivery of Connections Reform and Phase 2 offers, rather than the legal route itself.

Developer representatives and other workgroup members expressed concern that users should not be expected to accept a Gate 2 Offer containing an unachievable completion date while relying on a later amendment. Accepting an offer could expose projects to securities, liabilities, milestones and cancellation risks; therefore, members considered that a route to address completion dates before full acceptance remains important.

The Chair highlighted that the workgroup needed clarity on whether all TOs have discretion to agree date changes through post-offer negotiation. Members noted that differing TO approaches had been one of the drivers for CMP471 and that any proposed solution should avoid creating further inconsistency.

The Workgroup recognised that a flexible post-offer negotiation route could reduce administrative burden but considered that a formal route may still be needed where negotiation does not resolve the issue. Further clarity is required on regulatory acceptability, implementation practicality, offer acceptance periods and consistency across TO approaches.

Question 8/9: Would you anticipate using the Connection Date Delay process to change your Gate 2 modification Offer? If yes to question 8, for what reasons?

The consultation responses indicated that a number of respondents expected to use the proposed Connection Date Delay Request process. The Proposer considered that the responses reinforced the rationale for CMP471, particularly where projects are sufficiently developed to

Public

receive a Gate 2 Offer but the completion date in that offer is no longer achievable. Workgroup Members noted that the Workgroup Report should explain why a project may be ready for Gate 2 but still require a revised completion date.

A Workgroup Member noted that the responses should be considered in the context of the respondent mix, as support for the process was largely from developers. The Workgroup agreed that the report should explain the composition of respondents to help assess likely demand and potential request volumes.

The Workgroup also discussed request volumes and supporting evidence. The Proposer requested that NESO provide the underlying numbers gathered in its request for information response, including the number of relevant applications and connection date change requests. The chair noted that Ofgem had also raised questions about potential volumes and impacts, and agreed that the request for further information would be fed back to NESO.

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

The Workgroup considered whether the proposed legal drafting gave sufficient clarity on the process, or whether additional guidance would be needed. Members agreed that, while the legal text set out the high-level approach, several practical issues remained unclear for users and administrators.

A Workgroup Member highlighted uncertainty around whether multiple requests could be submitted and how a request would interact with the Gate 2 Offer acceptance period. The Workgroup was particularly concerned that a user could be required to accept an offer before receiving a decision on a delay request, potentially creating exposure to securities, liabilities and other contractual commitments.

The Proposer acknowledged that these points identified gaps in the supporting material. The expectation was that a request would receive due consideration and that any alternative completion date would be discussed through the assessment process; however, this was not explicitly explained in the legal text or guidance. Members agreed that some issues could be addressed through updates to the Gated Modification Guidance, while others may require legal text changes.

The Workgroup concluded that further guidance is required on process steps, timings, offer validity, decision-making and implementation. The Proposer agreed to review and update the Gated Modification Guidance to reflect consultation feedback and identify which matters should be resolved through guidance and which may require amendments to the legal drafting.

Public

Question 11: Would you propose any variations to the supporting information within the updated Gated Modification and Queue Management Guidance?

Question 11 was closely linked to the discussion on legal text. Consultation feedback indicated that the Gated Modification and Queue Management Guidance would need to be updated if CMP471 progresses, particularly to provide clarity on eligibility, evidence requirements, decision-making, timing interactions and consequential contractual impacts.

The Proposer agreed that this was a key area arising from the consultation and noted that the guidance should be reviewed against respondent feedback. The workgroup considered that guidance should explain how the process would operate in practice and help resolve concerns around offer validity, assessment arrangements and contractual interactions.

The Workgroup agreed that further work is needed on the guidance. The Proposer took an action to propose amendments to the Gated Modification Guidance, incorporating consultation feedback and identifying where legal text changes may be required.

Question 12: Are there any ramifications from excluding DNO embedded projects that are not already catered for in the separate connections process?

The Workgroup considered whether excluding DNO embedded projects from CMP471 could create unintended consequences. The Chair noted that relatively few consultation respondents raised concerns, suggesting that most respondents were comfortable with the transmission-focused scope of the proposal.

The Proposer explained that earlier versions of the proposal had considered a wider scope, but that DNO embedded projects introduced additional complexity. The current proposal is therefore intentionally focused on transmission-connected projects. Workgroup Members noted that, if DNO stakeholders consider that a similar mechanism is required, this may need to be progressed separately.

The Workgroup Members questioned whether equivalent arrangements already exist for DNO-connected projects and whether different treatment between transmission and distribution projects could appear inconsistent. The Workgroup noted that further DNO input would help confirm whether any gap exists.

Workgroup Members recognised that some DNO projects may already have alternative processes available, but agreed that further confirmation would be useful.

The Workgroup was not minded to expand CMP471 to include DNO embedded projects at this stage. However, members agreed that it would be helpful to seek confirmation from DNO stakeholders that equivalent arrangements exist, or to understand whether they consider that exclusion from CMP471 could create a disadvantage.

Public

The Workgroup maintained the current transmission-focused scope of CMP471, but recognised the value of obtaining further DNO feedback to provide assurance that distribution-connected projects are not being unfairly disadvantaged.

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?

The discussion confirmed that most respondents viewed CMP471 as still necessary, even if the NESO securities delay proposal is implemented. Consultation responses indicated that while the securities delay proposal from NESO may provide some short-term relief, it does not address the underlying issue of projects having unrealistic completion dates. The general view was that CMP471 provides a broader and more targeted solution by allowing completion dates to be aligned with realistic delivery programmes.

The Proposer considered that this feedback supported the need for CMP471 and demonstrated that stakeholders continue to see value in a completion date change mechanism beyond securities relief. Workgroup Members noted that the Workgroup Report should explain why the Workgroup believes that the NESO proposal does not address all of the issues CMP471 seeks to resolve.

Workgroup members also noted that the report should provide context on the make-up of respondents, particularly where developer respondents supported CMP471. The Chair summarised the emerging position from the Workgroup as that the NESO proposal may be helpful, but does not go far enough to remove the need for CMP471.

The Workgroup discussion broadly reflected the consultation responses, concluding that the securities delay proposal may provide some benefit but is not viewed by most respondents as a substitute for CMP471. Instead, the two mechanisms could operate alongside one another, with CMP471 addressing a wider range of completion date-related issues.

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?

The Workgroup considered whether 60 business days is an appropriate timeframe for NESO to respond to a Connection Date Delay Request. Consultation responses showed mixed views. Developer respondents generally considered the timeframe too long, while TOs and NESO were concerned that it may be challenging given resource requirements and interactions with Connections Reform activities. The Workgroup did not agree an alternative timeframe but recognised the need to balance timely decisions for users with the practical constraints on NESO and TO resources.

Public

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?

The consultation responses showed strong support (around 90%) for explicit drafting to clarify how a Connection Date Delay Request (CDDR) interacts with the Gate 2 Offer validity period. Respondents were concerned that developers could otherwise be forced to either accept an unrealistic Gate 2 Offer or risk losing it while a delay request is still being assessed. The key message was that the offer validity period should be paused, extended or otherwise protected while a CDDR is being considered, with some respondents suggesting users should be given additional time after a decision is made to review any revised offer.

The Workgroup discussion was brief because many of the issues had already been debated under Questions 10 and 11. The Proposer acknowledged that the concerns raised by respondents reflected the potential mismatch between the Gate 2 acceptance window and the proposed timescales for assessing a delay request. The Workgroup broadly agreed that the relationship between the two processes requires further clarification and that this should be addressed through updated legal drafting and/or supporting guidance. No specific solution was agreed, but there was consensus that the issue is important and needs to be resolved as part of progressing the modification.

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?

The discussion focused on whether a delay to a project's completion date should automatically trigger corresponding updates to the Appendix J Construction Programme. Consultation responses showed strong support for this, with most respondents concerned that failing to update Appendix J could create misalignment between contractual dates, project delivery plans and wider obligations.

The Chair explained that the intention was not to reopen previous discussions on User Progression Milestones, but to consider how to ensure that the practical construction programme reflects any approved completion date change. The Proposer agreed that there appeared to be a potential gap in the drafting, noting that while the proposal included provisions for some consequential changes, it was not clear that Appendix J updates were explicitly covered.

From a TO perspective, a Workgroup Member noted that updating the construction programme would normally be expected where a connection date changes, as TOs need to maintain alignment between contractual commitments and delivery plans. The Workgroup broadly recognised the importance of keeping Appendix J aligned with any approved completion date delay, although further detail is needed on how this would be achieved in practice.

Public

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

The Workgroup acknowledged that CMP471 could have implications for commercial frameworks such as Contracts for Difference (CfD) and the Capacity Market, particularly where a change to a project's completion date affects eligibility windows or delivery milestones. The Proposer and Workgroup Members highlighted that delays arising from Connections Reform or network-driven factors should not necessarily be treated as user-driven delays, as doing so could create commercial consequences for developers.

Workgroup Members also noted that accommodating Connection Date Delay Requests could affect the delivery of Phase 2 offers and potentially impact projects intending to participate in future CfD allocation rounds. The Workgroup concluded that decisions on how completion date changes affect CfD contracts sit outside the CUSC process and are for the relevant commercial framework bodies. The Workgroup Report may therefore highlight the issue, while recognising that developers may need to demonstrate whether any delay was project-driven or caused by external factors such as Connections Reform, NESO or TO actions.

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?

The consultation responses showed strong support for the proposed timeframe, with 92% of respondents agreeing that 20 business days after receipt of a relevant offer (or 20 business days beginning 10 days after implementation) would provide sufficient time to submit a Connection Date Delay Request. The Workgroup generally viewed this as positive evidence that the proposed timescales are workable for users.

Discussion focused less on the length of the submission window and more on whether NESO would have the systems and processes in place to administer requests effectively. The Proposer noted that any concerns about the practicality of the process should be clearly explained. A Workgroup Member also observed that implementing a new process may require system changes and sufficient preparation time.

The Workgroup concluded that the proposed submission window appeared broadly acceptable, but that further input from NESO is required on how the process would operate in practice. The NESO representative confirmed that the issue had been raised internally with relevant IT and Connections teams and that further information would be shared with the workgroup when available.

Action Log review

5- Open (TOs). Remain open. NESO to provide data from RFI and TOs make an assessment based on that.

6- Open. (RM) Remains open.

Public

- 9- Closed. (Ofgem) Ofgem wish to listen to WGs and not provide comments.
- 11 – Closed. (MD) Verbally updated at workgroups.
- 12- Open. (RM) remain open.
- 15- Closed (TP/RB/RM).
- 17- Closed. (TP)
- 18 – Closed (RM) Provided at previous workgroups.
- 19- Closed (TB). Covered in latest Connections Reform webinar.
- 20- Closed. (MD/TOs)
- 21- Moved to (IV) – To bring set of ‘showstopper’ scenarios to next Workgroup meeting.
- 22- Closed (TB/RW). To be considered in consequential STCP modification.
- 23- Closed (TB/RW).
- 24- Closed (MD/TB/RW). Superseded by action 28.

New actions from workgroup meeting 7:

- 25 – (RM/TB) NESO to provide the workgroup with data indicating the potential volume of Connection Date Delay Requests, including relevant information gathered through its request for information process.
- 26 – (TB) NESO to share its response on implementation and process arrangements once feedback has been received from the relevant internal IT and Connections teams.
- 27 – (TB) NESO to arrange a follow-up session with the proposer, NESO and NESO Legal to review outstanding guidance and legal drafting points.
- 28 – (MD/TB/RM) Review the treatment of transitional offers and confirm whether this affects the proposed removal or retention of Section 18 drafting. Seek views from Ruth Matthew and TO representatives before finalising the legal text.

AOB Discussion

A Workgroup Member sought clarification on how TO-driven delays are managed once a Gate 2 Offer has been issued, including whether CMP471 is needed where a TO subsequently determines that it cannot meet the contracted connection date. TO representatives explained that existing processes are already available to manage network-driven delays, with offers and contracts updated through established mechanisms where delivery dates change. The Workgroup concluded that CMP471 is primarily intended to address user-driven requests to delay connection dates, rather than TO-driven delays, which are expected to be managed through business-as-usual arrangements.

Next Steps

The Chair confirmed that the priority for the next meeting is to progress the outstanding actions and consolidate the consultation responses, together with the workgroup discussions, into the

Public

first iteration of the Workgroup Report. The chair noted that the first draft is unlikely to be available for the next meeting on Wednesday 5 August. The current expectation is therefore for Workgroup 9 to review the first draft, with Workgroup 10 used to finalise the report, agree the workgroup position and complete the vote.

The Chair asked workgroup members to use the next meeting as the final opportunity to raise any further issues, either on matters already discussed or on issues that have not yet been considered in sufficient detail. The Proposer will work with the NESO representative and NESO Legal to review the legal text, with a status update expected at the next workgroup and, if possible, draft revised text reflecting the consultation discussions.

Actions

For the full action log, click [here](#).

Action Number	Workgroup Raised	Owner	Action	Due by	Status
5	WG1	TOs	TOs to provide a qualitative impact assessment to WG8 Open help the workgroup understand how this modification could impact the Joint Industry Plan (JIP), also referred to as the Existing Agreement Timeline. NESO to provide data from the RFI for TOs to base their assessment on.		Open
6	WG2	RM	Confirm what ability NESO has to ensure TOs are aligning connection dates and to change the earliest customer connection dates in Scheme Briefing Notes (SBN) after a TO has issued a TOCO to NESO.	WG3	Open
12	WG2	RM	Confirm whether it is preferable and feasible for connection date delay requests and associated milestone or exception requests to be handled together as a single process, or whether they should continue being managed separately across different NESO teams.	WG3	Open
21	WG4	IV	Consider the minimum set of objective criteria to prevent non-viable requests progressing through	WG8	Open

Public

the process. IV to develop a set of “showstopper” or entry criteria from a TO perspective, meaning situations where a connection date delay request should not proceed, and bring these back to the Workgroup to test and refine.

25	WG7	RM/TB	NESO to provide the workgroup with data indicating the potential volume of Connection Date Delay Requests, including relevant information gathered through its request for information process.	WG8 Open
26	WG7	TB	NESO to share its response on implementation and process arrangements once feedback has been received from the relevant internal IT and Connections teams.	WG8 Open
27	WG8	TB/MD	NESO rep to arrange a follow-up session with the proposer, NESO and NESO Legal to review outstanding guidance and legal drafting points.	WG8 Open
28	WG8MD/RM/TOs	Review	the treatment of transitional offers and confirm whether this affects the proposed removal or retention of Section 18 drafting. Seek views from Ruth Matthew and TO representatives before finalising the legal text.	WG8 Open

Attendees

Name	Initial	Company	Role
Robert Hughes	RH	NESO	Chair
Mollie Griffiths	MG	NESO	Technical Secretary
Matthew Dowds	MD	Muir Hall Energy	Proposer
Paul Mott	PM	NESO	NESO rep
Terry Baldwin	TB	NESO	NESO Rep
Isabelle Vasko	IV	National Grid Electricity Transmission	Workgroup Member
Rob Smith	RS	Enso Green Holdings	Workgroup Member

Public

Paul Smillie	PS	Scottish Power Transmission	Workgroup Member
Alan Love	AL	Scottish Power Transmission	Workgroup Member (Alt)
Harriet Eckweiler	HE	SSE Transmission	Workgroup Member
Lamin Saidy Vulart	LSV	Qair UK	Workgroup Member
Thomas O'Neill	TO	Qair UK	Workgroup Member (alt)
Kirsty Dawson	KD	Stratkraft	Workgroup Member
Martin Hardwick	MH	Northern Powergrid	Workgroup Member
Andrew Allan	AA	RWE	Workgroup Member (alt)
Ciaran Fitzgerald	CF	Scottish Power Renewables	Workgroup Member
Niall Stuart	NS	Hutcheson Associates	Workgroup Member
Ben Clarke	BC	Bute Energy Ltd	Workgroup Observer
Henry McDonald	HD	Voltwise Power	Workgroup Member
Emma Webster	EW	Bute Energy Ltd	Workgroup Member
Kingsley Emeana	KE	Ofgem	Ofgem Representative
David Barber	DB	GridLink Interconnector Ltd	Workgroup Observer