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CUSC Alternative and Workgroup Vote

CMP471: Interim Contract Variation Process Ahead of CMP434 Gated Application Window

Please note: To participate in any votes, Workgroup members need to have attended at least 50% of meetings.

Stage 1 – Alternative Vote

If Workgroup Alternative Requests have been made, vote on whether they should become Workgroup Alternative CUSC Modifications (WACMs).

Stage 2 – Workgroup Vote

2a) Assess the original and WACMs (if there are any) against the CUSC objectives compared to the baseline (the current CUSC).

2b) Vote on which of the options is best.

Terms used in this document

Term	Meaning
Baseline	The current CUSC (if voting for the Baseline, you believe no modification should be made)
Original	The solution which was firstly proposed by the Proposer of the modification
WACM	Workgroup Alternative CUSC Modification (an Alternative Solution which has been developed by the Workgroup)

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For reference the Applicable CUSC (non-charging) Objectives are:

- i. *The efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence*;*
- ii. *Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;*
- iii. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency **; and*
- iv. *Promoting efficiency in the implementation and administration of the CUSC arrangements.*

** See Electricity System Operator Licence*

***The Electricity Regulation referred to in objective (iii) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.*

Workgroup Vote

Stage 1 – Alternative Vote

Vote on Workgroup Alternative Requests to become Workgroup Alternative CUSC Modifications.

The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.

Should the majority of the Workgroup OR the Chair believe that the potential alternative solution may better facilitate the CUSC objectives than the Original proposal then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative CUSC modification (WACM) and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.

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"Y" = Yes

"N" = No

"-" = Neutral (Stage 2 only)

"Abstain"

Workgroup Member	Alternative 1 (GridLink, Alternative approach to alignment of User Progression Milestones with Connection Date Delay)	Alternative 2 (Aukera , Interim Contract Variation Process for projects experiencing delays due to exceptional issues out with the User's control ahead of the initial CMP434 Gated Application Window)	Alternative 3 (Enso Energy, CDDR with Addition of QM Milestone Delays)
Andrew Allan	Y	N	Y
Ciaran Fitzgerald	Y	N	Y
Gareth Williams	Abstain	Abstain	Abstain
Garth Graham	Abstain	Y	Abstain
Henry McDonald	Not present at vote		
Kirsty Dawson	Y	N	Y
Lamin Saidy Vulart	Y	Abstain	Y
Martin Hardwick	Not present at vote		

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Mark O'Connor	Not present at vote		
Alastair Southworth	N	Y	Y
Harriet Eckweiler	Abstain	Abstain	Abstain
Isabelle Eleanor Vasko	N	N	N
Rob Smith	Y	N	Y
Niall Stuart	N	Y	N
David Barber	Y	N	Y
Paul Mott	N	Y	N
Matthew Dowds	Abstain	N	Abstain
WACM?	WACM1	WACM2 (brought forward by the Chair)	WACM3

Stage 2a – Assessment against objectives

To assess the original and WACMs against the CUSC objectives compared to the baseline (the current CUSC).

You will also be asked to provide a statement to be added to the Workgroup Report alongside your vote to assist the reader in understanding the rationale for your vote.

ACO = Applicable CUSC Objective

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Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Andrew Allan - RWE				
Original	-	Y	-	Y	Y
WACM 1	-	Y	-	Y	Y
WACM 2	-	N	-	Y	N
WACM 3	-	y	-	Y	Y
Voting Statement: A Connection Date Delay Request facility is valuable, to ensure Users can request to realign contracted positions, following the unexpected and material delays in the Connections Reform delivery process. Further, RWE supports WACM3 as the best solution, as is important to be able to realign User Progression Milestones (as well as all other material contract elements) when making a Delay Request. It is currently unclear in the provisions of CUSC 16.5 what "Exceptional Issues" would be considered valid, and the existing "Gate 2 to Whole Queue Exception" in Queue Management Guidance does not cater for the full effect of the TO and NESO driven delays being experienced. Making this explicit within the scope of the CMP471 solution ensures self-consistency in the connection contracts generated following a successful Connection Date Delay Request, while WACM3 also places a cap on the maximum extension, and therefore limits the possibility of any unviable projects unintentionally remaining in the queue. RWE does not support WACM2 due to the lack of established evidence and alignment to CUSC 16.5, which we believe would only add uncertainty, risk and					

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unnecessary complexity to this process – without material benefit –
introducing inefficiency in opposition to Objective 4.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Ciaran Fitzgerald – Scottish Power Renewables				
Original	Y	Y	–	Y	Y
WACM 1	Y	Y	–	Y	Y
WACM 2	Abstain	Abstain	Abstain	Abstain	Abstain
WACM 3	Y	Y	–	Y	Y

Voting Statement:

We assess the Original, WACM1 and WACM3 in the same way against each of the AOs.

AO i) – The Original, WACM 1 and WACM3 better facilitate AO i) relative to the baseline, as they allows connection contracts to be aligned with updated project programmes sooner, more quickly and without the need for an additional formal contract revision to be issued and accepted.

AO ii) – The Original, WACM1 and WAMC 3 better facilitate AO ii) relative to the baseline, as they ensure viable projects are not unnecessarily deterred from signing Gate 2 offers due to the financial implications of contract misalignment.

AO iii) – We believe the Original, WACM1 and WACM 3 are neutral with respect to facilitating AO iii) .

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AO iv) – We believe the Original, WACM1 and WACM3 better facilitate AO iv) relative to the baseline, as they reduce the administrative burden to CUSC parties that would be required to make the necessary Completion Date changes. Without CMP471, these changes would require a Gated mod-app, which would require significantly more input and management than with the baseline.

We have abstained from the vote for WACM2 as the processes from NESO required to assess the QM delay requests are not clear and the impact of these assessments is unknown. It is also unclear whether the change introduced in this WACM is required when considering the Exceptions process which is already in place.

We believe that the impact of Connections Reform implementation delays constitutes a valid Exception against QM milestones and that Exception applications for this reason should be accepted without the need for a review process. However, we believe this duration of the milestone delay should be limited and therefore we believe WACM3 is most effective and appropriate proposal.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Gareth Williams – Scottish Power Transmission				
Original	N	N	–	N	N
WACM 1	N	N	–	N	N
WACM 2	N	N	–	N	N
WACM 3	N	N	–	N	N

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Voting Statement:

While we acknowledge the concerns raised regarding the potential misalignment between a projects program and the TOs program resulting from the G2tWQ process, we are not persuaded that the defect and proposal have been sufficiently evidenced to demonstrate that the proposed modification or any of the alternatives is the most efficient and proportionate solution. As such, we would vote to retain the baseline.

Primarily, we are concerned that the implementation of CMP471 as proposed will create a material risk to the delivery of the Joint Industry Plan (JIP) through accommodating potentially large volumes of delay requests.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Garth Graham – SSE Generation				
Original	–	Y	–	Y	Y
WACM 1	–	N	–	N	N
WACM 2	–	Y	–	Y	Y
WACM 3	–	N	–	N	N

Voting Statement:

I support both the Original Proposal and WACM2, with a slight preference for the Original Proposal.

In my view, both options better facilitate Applicable CUSC Objective (ii), namely facilitating effective competition in generation and supply, and Applicable

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CUSC Objective (iv), promoting efficiency in the implementation and administration of the CUSC, when compared against the current baseline.

The current arrangements do not provide an effective mechanism for eligible users to align contracted Completion Dates with realistic delivery programmes during the extended Gate 2 to Whole Queue process. This creates a risk that projects will remain subject to contractual milestones, security requirements and potential liabilities that no longer reflect deliverable project timelines. In turn, this may distort investment and development decisions and create avoidable barriers for projects seeking to progress through the connections process.

I consider that the Original Proposal best facilitates Objective (ii) because it enables projects to proceed on the basis of up-to-date and realistic delivery assumptions, rather than historical contractual dates which may no longer be achievable following the implementation of connections reform. By reducing the risk of disproportionate security, liability and cancellation charge exposure associated with unrealistic Completion Dates, the proposal supports a more level playing field for affected users and therefore better facilitates effective competition.

I also consider that the Original Proposal better facilitates Objective (iv) by establishing a clear, transparent and time-limited process to address a specific consequence of the Gate 2 to Whole Queue transition. It provides an administratively efficient route for addressing Completion Date misalignment without requiring users to pursue multiple subsequent contractual variations or accept Gate 2 offers on the basis of assumptions that are known to be outdated. The proposal is targeted, proportionate and appropriately limited to the exceptional circumstances created by the connections reform process.

I also support WACM2, which I consider largely addresses the same defect and similarly delivers benefits against Objectives (ii) and (iv). WACM2 represents a workable and pragmatic solution that would improve the current baseline by

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providing an avenue for users to seek Completion Date adjustments where justified. However, on balance, I have a modest preference for the Original Proposal because I believe it provides the clearest and most comprehensive framework for delivering the intended policy outcome in a transparent and consistent manner for all eligible users.

I do not support WACM1 or WACM3. Whilst I have sympathy with the underlying intent of both alternatives, particularly the desire to recognise the practical challenges faced by projects progressing through development, I am not persuaded that the inclusion of additional provisions linked to the achievement of early development milestones, such as securing land rights and planning consent, is appropriate within the context of the wider connections reform programme.

A central objective of connections reform has been to ensure that scarce network capacity is prioritised towards projects demonstrating a credible pathway to delivery. The introduction of mechanisms which place additional emphasis on the status of land acquisition or planning activities risks creating outcomes that are not closely aligned with the specific defect CMP471 is intended to address. In my view, CMP471 should remain focused on the narrow issue of contractual Completion Date misalignment arising from the Gate 2 to Whole Queue process, rather than introducing broader policy considerations relating to project readiness and progression criteria.

Whilst land and planning milestones are undeniably important elements of project development, I consider that their treatment should be addressed through the wider connections reform framework and associated queue management arrangements, rather than through an interim modification designed to provide a temporary Completion Date delay mechanism. Expanding CMP471 in this way risks increasing complexity, creating potential unintended consequences and moving the proposal away from its original targeted purpose.

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For these reasons, I conclude that both the Original Proposal and WACM2 are preferable to the baseline and better facilitate Applicable CUSC Objectives (ii) and (iv). However, my preferred outcome remains the Original Proposal, with WACM2 as an acceptable alternative. I do not support WACM1 or WACM3, principally because their reliance on land and planning-related milestones appears difficult to justify in the context of the aims and principles underpinning wider connections reform.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Kirsty Dawson – Statkraft				
Original	Y	Y	–	Y	Y
WACM 1	Y	Y	–	Y	Y
WACM 2	N	N	–	N	N
WACM 3	Y	Y	–	Y	Y

Voting Statement:

Developers have been subject to several delays throughout the Connections Reform process, which in turn has a knock-on negative impact on aspects such as land, planning, route to markets, securities, etc. Though NESO is currently licensed to open a Connections Reform gated window this year, there is still no certainty on when this will be, and how it will look. The Original and WACMs 1 & 3 provide an opportunity for developers to make changes to dates in a window that is certain and provides a slice of certainty and control in an ever-changing uncertain space. We see WACM 2 as adding significantly and unnecessarily to the admin burden on developers and NESO.

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Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
Lamin Saidy Vulart – Qair UK					
Original	–	Y	–	Y	Y
WACM 1	Y	Y	–	Y	Y
WACM 2	Abstain	Abstain	–	Abstain	Abstain
WACM 3	Y	Abstain	–	Y	Y
Voting Statement: The endorsement for these WACMs simply because the connection date is meaningless if the QM milestones tied to it don't move with it. Furthermore, it should automatically adjust all User Progression Milestones to the new date, instead of keeping them fixed to the old deadlines.					

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
Matthew Dodds – Muirhall Energy					
Original	Y	Y	–	Y	Y
WACM 1	–	N	–	N	N
WACM 2	–	N	–	N	N
WACM 3	–	N	–	N	N
Voting Statement:					

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I support the Original Proposal and consider that it better facilitates the Applicable CUSC Objectives than the Baseline. I have assessed the proposal as positive against Objectives (i), (ii) and (iv), and neutral against Objective (iii).

Objective (i) – The current arrangements can leave Users with contracted connection dates which no longer reflect their realistic project delivery programmes. CMP471 provides a mechanism to address this misalignment ahead of the CMP434 Gated Application Window. In my view, this should enable NESO to administer the connection process more efficiently and reduce the need for subsequent contract variations once Gate 2 Offers have been accepted.

Objective (ii) – I consider CMP471 to be positive against this objective because it should reduce the potential for outdated connection dates and associated liability positions to influence whether Users accept or reject Gate 2 Offers. Allowing contractual positions to better reflect current project circumstances should support more informed decisions and a more efficient competitive environment.

Objective (iii) – Neutral. I have not identified any material impact on compliance with the Electricity Regulation or any relevant legally binding decisions.

Objective (iv) – I consider this to be a key benefit of CMP471. The proposal provides a defined mechanism for Users to make a connection date adjustment during an otherwise restricted period. This should reduce the likelihood of Users subsequently requiring further contractual variations and should reduce the administrative burden for both NESO and Transmission Owners. It should also provide more accurate information on expected project delivery dates for the purposes of network planning.

WACMs 1, 2 and 3 effectively build on the Original Proposal. While I consider the Original Proposal to improve upon the Baseline, I do not consider that the WACMs improve upon the Original Proposal. The additional components of the

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WACMs either introduce unnecessary additional burden into the CMP471 process or provide too much flexibility in changing queue management milestones.

Overall, I consider the Original Proposal to be a proportionate and limited intervention which addresses specific issues arising during the transition to the CMP434 arrangements. I therefore consider the Original Proposal to better facilitate the Applicable CUSC Objectives than the Baseline, in particular Objectives (i), (ii) and (iv).

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Better facilitates ACO (v)	Overall (Y/N)
	Alastair Southworth – Harmony Energy					
Original	-	Y	-	Y	Y	
WACM 1	-	N	-	N	N	
WACM 2	-	Y	-	Y	Y	
WACM 3	-	Y	-	Y	Y	

Voting Statement:

Original, WACM2 and WACM3

Allows a transition of viable projects that may experience unfair cost exposure to reasonably defer their connection date through justification. They maintain queue discipline and prevents broad automatic milestone slip without justification. CDDR could introduce further processing delays ahead of gate 2 offers and CMP434 if managed improperly.

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WACM 2 & 3 introduces a throttle on the standard 30 month response of connection reform as a blanket excuse and removes request and receive to an evidentiary standard.

WACM1 Automatically moving every milestone simply because the end connection date moved removes accountability for early-stage deliverables. Connections Reform relies on clear, strict milestones to remove non-viable capacity from the queue. WACM1 risks softening these signals and prolonging grid congestion.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Harriet Eckweiler – SSE Transmission				
Original	Abstain	Abstain	Abstain	Abstain	Abstain
WACM 1	Abstain	Abstain	Abstain	Abstain	Abstain
WACM 2	Abstain	Abstain	Abstain	Abstain	Abstain
WACM 3	Abstain	Abstain	Abstain	Abstain	Abstain

Voting Statement:

We understand the rationale for the proposed changes under the Original proposal. However, we consider that the current priority should be the completion of G2tWQ Phase 2 and the issuance of Gate 2 offers to customers in line with the agreed Joint Industry timetable. We believe it would be more appropriate to consider further changes of this nature once that process has concluded.

For this reason, we have abstained from voting on the Original proposal. We have similarly abstained from voting on the WACMs.

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Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
Isabelle Eleanor Vasko – National Grid Electricity Transmission					
Original	N	–	–	N	N
WACM 1	N	–	–	N	N
WACM 2	N	–	–	N	N
WACM 3	N	–	–	N	N
Voting Statement: Whilst the CMP471 proposal was created only to provide developers with flexibility in their connection dates, the proposal as currently drafted brings unintended and potentially significant consequences for transmission network companies and developers alike: 1. The proposed window will divert our teams from restudying and updating Phase 2 offers. This delays contractual certainty for those still awaiting offers. 2. The volume of the potential requests we are likely to receive for delays is uncertain. NESO's recent RFI on non-gated Mod Apps was limited in its scope. Subsequently, the time and resource this activity could take are difficult to determine, presenting an unquantifiable risk. 3. Even potentially small volumes of delay requests will impact the published timelines for Reform implementation. Phase 2 is significantly larger than Phase 1, with over double the offers required. Reopening assessments for Phase 1 customers whilst delivering on the existing timeline for Phase 2 offer creation is unfeasible.					

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We believe that alternative approaches are possible which do not risk the above points. One possible route, which would require further consideration, would be for NESO to hold a dedicated delay request window after the conclusion of Phase 2 offers to allow customers to realign their offers where required.

In reference to the applicable objectives, we believe that objective (i) would be negatively impacted as the implementation of this modification imposes an entirely new process on NESO and TOs which will limit our ability to deliver Connections Reform.

In this respect, we assess objective (iv) in the exact same way.

The other objectives we assess as having neutral impact, albeit we have sympathy for the proposer, and of all in-scope developers, wishing to prompt action on reasonable adjustments to their programme. However, we believe there are sufficient alternatives available without the need to modify the CUSC in piecemeal manner which will have negative consequences to our wider Reform activities.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Rob Smith – Enso Green Holdings				
Original	–	Y	–	Y	Y
WACM 1	–	Y	–	Y	Y
WACM 2	–	N	–	N	N
WACM 3	–	Y	–	Y	Y
Voting Statement:					

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Connection Reform and the associated introduction of CP2030 have had a significant impact on developer investment confidence. The risk of changes in connection costs, connection dates and Points of Connection, have made it impossible for developers to take Financial Close (FC) and secure debt financing for these projects until Gate 2 Offers are received. Reviewed and accepted.

This impact is particularly prevalent for projects with 2028/2029/2030 connection dates. In a climate of supply chain uncertainty and extending lead times, many projects with connections in these timeframes would plan to take FC by now and enter into the required EPC contracts and secure slots from OEM's for long lead time items. However, the extended connection reform uncertainty means this is not possible. Good, ready, and strategically required projects are at risk of failure, not due to any fault of their own but due to the assumed unforeseen consequences of the introduced Connection Reform methodology.

The loss of these projects would.....

- Lead to significant redevelopment of the network development plan
- Lead to the failure of strategically required projects
- Reduce investor confidence and raise risk premiums and associated development costs
- *Put greater risk of the ability to meet the CP2030 targets*

The original, WACM1 and WACM 3 all go some way to mitigating this risk. Further WACM1 and WACM3 address the associated risks of QM milestones. As such we believe they better facilitate applicable objectives ii and iv.

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Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Niall Stuart – Hutcheson Associates				
Original	N	N	–	N	N
WACM 1	N	N	–	N	N
WACM 2	Y	Y	–	Y	Y
WACM 3	N	N	–	N	N

Voting Statement:

The original proposal is not consistent with the aims of the TMO4+ connection reforms, which were designed to ensure that only projects aligned with Clean Power 2030 which were ready to meet their connection dates would be allowed to remain in or to join the connections queue, as the proposal would allow projects which are no longer ready or which were not ready to meet the connection date in their current offer or Existing Agreement to request a later connection date.

WACMs 1 and 3 would more significantly undermine some of the most fundamental aspects of the connections reforms introduced through CMP434 and 435, as these would allow Users to delay their connection date and extend their queue management milestone dates. This would put us back to a situation where projects which are not ready and which developers have failed to progress could simply push back their connection date and extend their queue management milestones in order to keep their place in the connections queue, which would come at the expense of other projects which are progressing and seeking to secure a Gate 2 offer in a future gated application window.

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In addition, having seen the headline results from the recent NESO RFI, we believe that an unrestricted right to request a later connection date would lead to a significant number of requests being submitted and that this could lead to further delays to the issuing of the remaining Gate 2 offers still to be issued as part of the Gate 2 to Whole Queue Exercise, and delay the first gated application window under the enduring CMP434 regime.

For these reasons we believe that the proposal and WACMs 1 and 3 are not consistent with the applicable objectives i), ii) and iv).

However, we recognise that some projects may have been impacted by issues outwith their control, meaning they are no longer able to meet their current or expected completion date and that there is benefit in the introduction of a mechanism which would allow Users in these circumstances to request a later connection date in line with their updated project programme. This would be in addition to – and separate from – the mechanism by which projects can request amendments to their queue management milestones as set out in the latest NESO queue management guidance. For these reasons we believe that that WACM 2 is consistent with the applicable objectives i), ii) and iv).

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	David Barber – Gridlink Interconnector Limited				
Original	Y	Y	–	–	Y
WACM 1	Y	Y	–	Y	Y
WACM 2	N	Y	–	N	N
WACM 3	Y	Y	–	N	Y
Voting Statement:					

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WACM 1 (Y) provides the most consistent, simplest and clearest approach to fully implement the stated intention of the modification which is to allow Users to re-plan their connections aligned with latest project schedules to take into account the delays caused by Connections Reform and the G2TWQ offer process, by treating the decision to allow a Connections Date Delay Request on same basis as a new application under CUSC with respect to the associated User Progression Milestones, i.e. providing for the re-calculation of the User Progression Milestones that apply from the new Connection Date. WACM 2 (N) adds an additional layer of complexity to the decision-making process under the modification (essentially adding an equivalent to a Exceptions request procedure before the Connections Date Delay Request is processed as envisaged) which would be unwieldy, resource-demanding, time-consuming and inefficient, and it would probably be unachievable in the time available for the implementation of the Connections Date Delay Request process alongside the determination/acceptance period allowed for G2TWQ offers. WACM 3 (Y), if WACM 1 is not approved, provides a partial solution to the need to allow alignment of User Progression Milestones with the Connections Date Delay Request. It recognizes the need allow Users to re-plan their connections aligned with latest project schedules to take into account the delays caused by Connections Reform and the G2TWQ offer process, however it limits the change allowable to the User Progression Milestones (to 18 months) that may not reflect the impact of Connections Reform on User's project schedules and it adds a second procedure after the Connections Date Delay Request which would be resource-demanding, time-consuming and inefficient. Therefore, it is a positive albeit sub-optimal alternative compared to WACM 1.

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Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Paul Mott – NESO				
Original	N	N	–	N	N
WACM 1	N	N	–	N	N
WACM 2	N	N	–	N	N
WACM 3	N	N	–	N	N
Voting Statement: NESO do not believe this mod CMP471 or any of its three WACMs, better meets CAO(i) (re: licence obligations) or (ii) (re: competition). NESO are currently, alongside the TOs and DNOs, in the midst of delivering connection offers in accordance with the Joint Industry Plan (JIP). Adding the additional process to allow developers to delay their connection dates would create a material risk to the delivery of the JIP and carries the risk of causing severe delays to those yet to receive their G2tWQ (gate 2 to whole queue) connection offers by changing the baseline timings to which NESO, DNOs and TOs are working. NESO with support of the TOs and DNOs introduced several measures ahead of the connections reform process to help enable projects to ensure that they were ready. This included moving to transitional offers to speed up connections offers and a pause period which also included an exceptions process. Ahead of the pause process, NESO and the TOs received significant numbers of modification applications as developers sought to revise their connections ahead of the reform process to ensure that they were in the best position going forward. Further to this NESO have continued to support developers through a securities freeze process which has been extended on several occasions, comprising an					

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approach where we do not enforce Queue Management (QM) milestones until a gate 2 offer has been signed as well as an extension to the QM exceptions process to address the delays caused by the G2tWQ process.

NESO launched a scoping exercise to build a clearer, evidence-based understanding of the types and volume of potential modification requests. NESO intends to use this to identify how best to support customers in progressing their projects while maintaining a fair and, importantly, workable process. NESO received 530 responses to this exercise, with over 70% indicating that they wished to make a gated change. 38% of respondents indicated that they wished to make a change to their connection date.

Regarding CAO (iv) (efficiency in administration of the CUSC), the G2tWQ process was developed in conjunction with industry via the CMP434/5 code mod process. There was significant debate and discussion across industry to shape how the resulting connections reform worked and how it applied to users. This was then subsequently approved by Ofgem.

Whilst we acknowledge that the delivery of connections offers has taken longer than anticipated, we are focused on adhering to the Joint Industry Plan alongside our delivery partners. CMP471 risks significantly jeopardising this and making the process inefficient by adding an additional layer of complexity that would delay the release of connection offers to those without signed gated agreements.

If passed, CMP471 (or its WACMs) would risk causing further delays to those yet to receive their Gate 2 offer across both T and D as resource is diverted to deal with the change. This would also have detrimental impacts to the next application window and risk pushing this back even further. So CMP471 and its 3 WACMs would each be worse than baseline in relation to non-charging CAO (iv) *"Promoting efficiency in the implementation and administration of the CUSC arrangements."*

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As noted above, NESO have already implemented a securities freeze and this was further extended on 16/07/26 for a further 6 months. NESO are also investigating further measures to address securities concerns.

Of the 14 votes, how many voters said this option was better than the Baseline.

Option	Number of voters that voted this option as better than the Baseline
Original	9
WACM1	6
WACM2	3
WACM3	7

Stage 2b – Workgroup Vote

Which option is the best? (Baseline, Proposer solution (Original Proposal), WACM1 or WACM2)

Workgroup Member	Company	Industry Sector	BEST Option?	Which objective(s) does the change better facilitate? (if baseline not applicable)
Andrew Allan	RWE	Generator	WACM 3	(ii)(iv)
Ciaran Fitzgerald	Scottish Power Renewables	Generator	WACM 3	(i) (ii)(iv)

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Gareth Williams	Scottish Power Transmission	Network Operator	Baseline	
Garth Graham	SSE Generation	Generator	Original	(ii)(iv)
Henry McDonald	Voltwise Power	Developer	Not present at vote	
Kirsty Dawson	Statkraft	Generator	WACM 3	(i) (ii)(iv)
Lamin Saidy Vulart	Qair UK	Generator	WACM 3	(ii)(iv)
Martin Hardwick	Northern Powergrid	Network Operator	Not present at vote	
Mark O'Connor	EDF Energy Renewables	Generator	Not present at vote	
Alastair Southworth	Harmony Energy	Generator	WACM 2	(ii)(iv)
Harriet Eckweiler	SSE Transmission	Onshore Transmission	Baseline	
Isabelle Eleanor Vasko	National Grid Electricity Transmission	Onshore Transmission Licensee	Baseline	
Rob Smith	Enso Green Holdings	Generator	WACM 3	(ii)(iv)
Niall Stuart	Hutcheson Associates	Generator	WACM 2	(i) (ii)(iv)
David Barber	GridLink	Interconnector Project Promoter	WACM 1	(i) (ii)(iv)

Public

Paul Mott	NESO	Network Operator	Baseline	
Matthew Dowds	Muirhall energy	Generator	Original	(i) (ii)(iv)