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Transforming Connections Data

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The register can't tell a withdrawal from a transfer or a correction. My proposal: a change reason on every entry that moves or leaves.

MM

Transforming Connections Data: response to Ofgem's 2026 policy consultation

Response to Ofgem's consultation of 25 September 2026 · Mark D Moore, independent energy consultant · Non-confidential · Submitted 30 October 2026

SUMMARY

Ofgem proposes stable identifiers, creation and last-modified dates, retained actual connection dates and a restricted connection field for the TEC Register. It considered a Gate reason field and a delay reason field and did not take them forward, on the grounds that the information can be inferred or that planned and actual dates give enough context (paragraphs 5.91 and 5.92). I support the proposals. From a snapshot series of the published register, I show that a user cannot currently tell a withdrawal from a transfer, a re-keying or a data correction, and that connection dates move back and forth between editions without trace. I propose a single change or exit reason on each entry that changes or leaves, a correction flag and change log of the kind already proposed for the Demand Capacity Register, and the previous planned connection date. From SSEN's Embedded Capacity Register and the ASTI regulatory dates, I also propose a scheme identifier and maintained target dates in the ECR, and mandatory delay reasons and baseline dates in the TORI.

Question 6. Should storage projects be included in the DCR? (1 to 3)

Question 13. Do you agree with the proposed improvements to the ECR? (4 to 8)

Question 21. Do you agree with the proposed TORI schema? (9 to 13)

Question 23. What information should the TORI provide on project delays and delivery risks? (14 to 18)

Question 25. Do you agree with the proposed improvements to the TEC register? (19 to 25)

Question 27. Any other TEC register-specific comments? (26 to 28)

Question 28. Do you agree with the proposed common design principles for connections datasets? (29 to 30)

Question 29. Is a single "restricted connection" indicator sufficient? (31 to 32)

Question 33. Any other comments? (33 to 35)

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PACKAGE 1: DEMAND CAPACITY REGISTER

Question 6. Should storage projects be included in the DCR?

Selection: **Yes**

1 Storage import should appear in the DCR, flagged as storage and carrying the same project identifier as the storage project's entry in the ECR or TEC Register. Duplication is then a matter of

a single filter, and the user can see both the import requirement and the export record for the same asset.

2 The case for linkage is stronger than the case for exclusion, because storage capacity already moves between categories. Ofgem's Curate consultation (29 July 2026) found at least 9 GW of data centre demand that had previously been battery storage. At present there is no way to follow such a conversion across published datasets. The Alverdiscott case shows the difficulty. Two TEC Register entries held by Xlinks 1 Ltd, PRO-001344 and PRO-001345, 1,800 MW each, left the TEC Register in September 2026 and moved to the Interconnector Register; NESO confirmed the move as a data correction (enquiry 00125909, 23 September 2026). The promoter now describes a data centre and battery storage campus connecting at Alverdiscott, and NESO has withheld, under regulation 12(5)(e) of the Environmental Information Regulations, whether a modification to a demand profile has been submitted (FOI/26/136). A user of the published data cannot tell which register will carry the site's demand, or when.

3 Two further points:

- The TEC Register file of 27 October 2026 carries 95 projects whose plant type includes demand, with a combined registered capacity of 59.5 GW (respondent's count; most combine demand with storage or generation, so this is not a demand figure). The transmission DCR and the TEC Register should share identifiers so that these projects are neither counted twice nor lost when the DCR is introduced.
- Where a storage project converts to, or is co-located with, demand, the DCR entry should record the earlier identifier, so that the queue history is not reset by the change of use.

PACKAGE 3: EMBEDDED CAPACITY REGISTER

Question 13. Do you agree with the proposed improvements to the ECR?

Selection: **Yes**

4 The proposals for a last-update field, an error-reporting route and a restriction status field are supported. Three further improvements should be prioritised, on evidence from SSEN's published registers (every monthly edition from October 2025 to October 2026, and six-monthly editions from October 2023).

5 **1. A scheme identifier.** The ECR template under DCP350 has no field identifying the scheme. SSEN's "Reference" column refers to flexibility services provided, not to the scheme (SSEN register definitions), and accepted schemes carry no MPAN. A scheme can be followed between editions only by matching its name and location, and the match fails when a scheme connects. Across three years of SEPD editions (October 2023 to October 2026), 25 schemes could be traced from "accepted" to "connected", while 405 left the register in ways that cannot be identified as either withdrawal or connection (respondent's count).

6 **2. Target dates maintained, with their history.** SSEN defines the target energisation date as an estimate that "is likely to change to reflect the latest date notified by customers". In practice:

- SSEN first published target dates in the November 2025 edition (2 dated SEPD schemes in October 2025; 339 in November 2025);

- of the 339 SEPD schemes dated in November 2025, 12 (3.5%) had their date changed in the following eleven monthly editions;
- of 65 SEPD schemes that reached their published date between November 2025 and September 2026, 58 (89%) were still listed as awaiting connection a month later;
- in the October 2026 edition, 78 of 307 dated SEPD schemes awaiting connection (25%, 1,577 MW) carried a target date already past, by a median of 7.5 months and up to 21.3 months. SHEPD shows the same pattern: 90 of 360 schemes (25%, 1,958 MW);
- of the 78 overdue SEPD rows, 50 were last updated before their target date passed.

7 These are SSEN's files, read as published. The finding concerns how the dataset is maintained, not SSEN's delivery performance. The ECR should require target dates to be reviewed at each monthly publication, and should carry the previous target date (or a dated history of changes), so that users can see whether a date is a live estimate or a date notified once and not revisited.

8 **3. Consistent population across operators.** Electricity North West's October 2026 register leaves the Reference and Target Energisation Date columns blank for the rows checked. The DCUSA modification should make the date and identifier fields mandatory for accepted schemes, so that the same question can be asked of every operator's register.

PACKAGE 5: TRANSMISSION OWNER REINFORCEMENT INSTRUCTION

Question 21. Do you agree with the proposed TORI schema?

Selection: **Yes**

9 The common schema with the TWR, the persistent Package ID and the linkage to queue project identifiers are supported. Four amendments are proposed.

10 **Added: regulatory baseline dates.** Where the package carries them, the optimal delivery date, the licence or ODI Target Date and the licence backstop date. Without these, the current forecast energisation date cannot be read against the date the project was funded to meet (see Question 23).

11 **Added: first published forecast energisation date.** Mandatory, fixed at first publication. This allows slippage to be measured without reconstructing past editions.

12 **Reclassified: delay reason.** From conditionally applicable to mandatory wherever delivery status is "delayed" or "at risk". A delayed package with no stated reason is the case the field exists for.

13 **Reclassified: linked queue project identifier(s).** Mandatory wherever the works are named as a dependency in a connection offer. Connection dates depend on these works, and the link should not be optional where it is known.

Question 23. What information should the TORI provide on project delays and delivery risks? Should standard categories be used?

Selection: **Yes, standard categories**

14 Evidence from the ASTI programme shows why delay information matters to connecting customers.

15 Of 155 dated TEC Register entries at substations served by ASTI projects (82.5 GW), 81 (52.3%, 51.9 GW) carry connection dates beyond the licence backstop of the governing ASTI scheme, taking the earliest scheme where a substation is served by more than one. Only 15 (9.7%) fall in the ODI Target Date year. Taking the latest governing scheme instead gives 49.0% beyond the backstop. This is the respondent's analysis of the TEC Register against the dates in Ofgem's ASTI decision (15 December 2022) and the transmission licences, captured 1 to 11 September 2026. It tests association with a published regulatory date, not with an engineering programme, and the cause of the gap cannot be read from published data. A connecting customer, an investor or the regulator cannot currently tell from published data whether a connection date reflects a known reinforcement delay, a customer choice or something else. The National Audit Office reported on 11 September 2026 (HC 589) that 50 of 56 essential transmission projects are forecast to complete after their optimal date.

16 The TORI should provide:

1. Delivery status (on track, at risk, delayed), as proposed.
2. A standard delay reason, mandatory for at-risk and delayed packages (see the categories below).
3. The current forecast energisation date shown against the regulatory baseline dates proposed under Question 21, with the variance in months.
4. A dated record of each change to the forecast energisation date. The quarterly narrative is valuable but is not machine-readable, and cannot by itself show how often or by how much a date has moved.

17 **Categories.** A fixed list: planning and consents; land rights; outage availability; design change; equipment and materials availability; dependency on other works; reprioritisation of the network plan; other, with narrative.

18 Describing the supply chain category as "equipment and materials availability" conveys what users need to know without naming suppliers or contracts, which addresses the commercial sensitivity raised by network companies (paragraph 5.67).

PACKAGE 6: TEC REGISTER

Question 25. Do you agree with the proposed improvements to the TEC register?

Selection: **Yes**

19 The stable project identifier, sub-project identifiers, creation and last-modified dates, retention of actual connection dates and the restricted connection field are all supported. Three further improvements should be prioritised. The evidence is a snapshot series of the TEC Register from 14 August 2026 (seventeen files to 27 October 2026), compared edition by edition.

20 **1. A change and exit reason on every entry that changes or leaves.** Paragraph 5.91 states that the reason a project did not receive a Gate 2 offer "can generally be inferred from other available data", and paragraph 5.92 that separate planned and actual connection date fields would give users sufficient context on delay. The register as published does not support either conclusion.

- Between the 14 and 25 August 2026 files, seven projects totalling 4.2 GW left the register, all held by Elmya RPC and RPC Elmya Carnation entities. The project companies remained active

at Companies House. From the register alone it cannot be established whether the capacity was withdrawn, transferred to new project companies, or moved to a distribution connection. On the 13 October 2026 file, nine entities with Elmya and RPC Elmya names joined the register carrying 5.4 GW. Whether any of these are the projects that left in August cannot be determined from the published data.

- On the 27 October 2026 file, 1,093 projects (350.1 GW) carry no Gate label on any row. Of these, 354 are recorded as built. The remaining 739 include projects not yet assessed and projects that did not qualify, and the register does not distinguish between them (respondent's count).

21 The request is narrower than the Gate reason and delay reason fields considered at 5.91 and 5.92. It is a single field, completed only when an entry changes materially or leaves, recording which of a short list of events has occurred: withdrawn or terminated; transferred to a new customer or project company; re-keyed, split or merged; moved to another register; data correction; connected. NESO knows which of these has happened in each case. Publishing it removes the need for every user to reconstruct it from Companies House.

22 **2. A correction flag and a published change log.** NESO's answer to enquiry 00125909 (23 September 2026) confirmed that the TEC Register carries no field or convention marking a removal as a data correction, and that NESO does not publish, and does not intend to publish, a change log of corrections under the temporary governance process; both matters were referred to this consultation. Three cases from the snapshot series show why both are needed:

- Gastard BESS (PRO-003552, 200 MW) and Lambeeth 240MW (PRO-004361, 240 MW) were absent from the 5 October 2026 file and present, field for field unchanged, on the 28 September, 13 October and 16 October files. A user comparing editions records two exits and two returns that did not happen.
- On the 13 October 2026 file, Immingham (PRO-000053) was split into two rows with 1,268 MW counted in both, overstating the register by 1.27 GW. It was corrected by the 16 October file, without notice. Bearsden BESS (PRO-004404, 100 MW) arrived on the 13 October file with the same structure and was not corrected on the 16 or 20 October files.
- Connection dates reverse between editions. Between the 20 and 27 October 2026 files, 14 entries changed connection month, excluding entries that also changed Gate label; 13 of them returned to a month the same entry had carried on the 5, 13 or 16 October file. Rugby HIGEH 1 (PRO-003626) moved from 2034 (5 October) to 2037 (13 October), to 2033 (16 and 20 October) and back to 2037 (27 October).

23 A data correction flag is already proposed for the DCR (Table 1.1). The same field, with a change log published alongside each edition, should apply to the TEC Register.

24 **3. The previous planned connection date.** Renaming "MW Effective From" to "Planned Connection Date" is supported. The register should also carry the previous planned date and the date it changed, or a dated history. Without it, the reversals above are invisible to anyone who does not hold every past file, and a planned date that has already passed (as with Petroc Offshore Wind Farm on the 16 October 2026 file, dated 31 March 2026) cannot be distinguished from a date that is about to be revised.

25 On the stable identifier (5.72), the identifier should survive re-keying, tranche splits, changes of customer or project company, and moves between registers. The snapshot series records several re-keyings in which the Project Number changed: Norfolk Vanguard West (PRO-000459), split into two tranches with new numbers; Immingham, as above; and Willington Green Energy Centre (PRO-001797) and Swansea North Green Energy Centre (PRO-001794), re-keyed between August and September 2026. Where an identifier must change, NESO should publish a mapping from the old identifier to the new.

Question 27. Any other TEC register-specific comments?

26 **Archive of past editions.** NESO publishes the current TEC Register and replaces it. The 2024 and 2025 editions used in this response were obtained under FOI/26/174. Every published edition should remain downloadable, with its publication date. Several of the improvements proposed in this consultation (actual connection dates, date history, change logs) are cheaper for NESO to provide if past editions are kept, and impossible for users to reconstruct if they are not.

27 **Consistent file format.** The date format in the published file changes between editions. Of the seventeen files published between 25 August and 27 October 2026 and held by the respondent, seven use day-first dates (for example 31/10/2034): those of 1, 8, 15, 21 and 24 September, and 5 and 27 October. The other ten use ISO 8601 (2034-10-31). Decimal padding changes with them. A user processing the file automatically has to detect the format edition by edition. The schema should fix ISO 8601 dates and a single numeric format.

28 **Gate labels at tranche level.** On the 16 October 2026 file, three projects (Bilbo Farm, Kirkby and Bramley BESS) lost a Gate 2 label on their second tranche while the first tranche kept it. The guidance accompanying the schema should state whether Gate labels apply to the project or to the tranche.

ADDITIONAL AND OVERARCHING QUESTIONS

Question 28. Do you agree with the proposed common design principles for connections datasets?

Selection: **Yes**

29 Four further principles should apply across all connections datasets:

1. **Identifier persistence.** An identifier, once published, is never reused or reassigned; where it must change, a mapping is published.
2. **A change log with every edition.** Each publication lists entries added, removed and materially changed since the previous edition, with the reason drawn from a controlled list (see Question 25).
3. **A retained archive.** Every past edition remains available, dated (see Question 27).
4. **Fixed formats and a published data dictionary.** ISO 8601 dates, one numeric convention, controlled vocabularies, and a data dictionary versioned alongside the schema, so that a change of format is a documented schema change, not an unannounced variation between editions.

30 These principles serve the data quality dimensions set out at paragraph 4.155, in particular consistency, uniqueness and integrity, none of which a user can test without them.

Question 29. Is a single "restricted connection" indicator sufficient?

Selection: **No**

31 A yes/no indicator is a clear improvement on "firm" and "non-firm", but it does not tell a user what the restriction means for the project. Two additional fields are proposed, both short and both already known to the network company:

- **Restriction type**, from a controlled list: curtailable; timed or seasonal; capped below agreed capacity; interim pending reinforcement.
- **Condition for removal**, as a date where one is set, or as the Package ID of the reinforcement on which removal depends, linking to the TORI or DWR.

32 These fields matter for storage and for large demand in particular. At SSEN's Chickerell BSP, contracted battery storage demand (110.69 MVA) exceeds maximum observed gross demand (84.78 MVA). SSEN's glossary confirms that contracted storage demand is excluded from the published demand headroom figure, but neither the ECR nor the headroom data shows whether that import is connected on restricted terms. A restriction type field would answer the question directly. This approach does not require a curtailment percentage, which paragraph 5.93 notes would oversimplify.

Question 33. Any other comments?

33 **Basis of this response.** The evidence in this response comes from published data, read edition by edition: a snapshot series of the NESO TEC Register from 14 August 2026, with earlier editions of 2 February 2024, 2 July 2024 and 28 January 2025 obtained from NESO under FOI/26/174; every monthly edition of SSEN's Embedded Capacity Register (SEPD and SHEPD) from October 2025 to October 2026, with six-monthly editions from October 2023; a register of the 26 ASTI projects setting each project's optimal delivery date, ODI Target Date and licence backstop date against the connection dates of TEC Register entries at the substations it serves; and NESO's written answer of 23 September 2026 to enquiry 00125909. Where a figure is the respondent's own count, it is stated as such.

34 **Near-term data quality measures should be dated now.** Paragraph 4.159 defers a full data quality framework, and paragraph 4.160 records consensus that some measures could be implemented quickly: error-reporting routes, clear accountability for corrections, and last-updated dates. Ofgem's decision document should set dates for these near-term measures across the TEC Register, ECR, TORI and TWR, independent of the timetable for the wider framework. On the evidence in this response, the near-term measures would address most of the problems a user meets today.

35 **Evidence available to Ofgem.** The TEC Register snapshot series, the SSEN ECR panel and the ASTI date register referred to above are held by the respondent, with method notes. They can be made available to Ofgem's Transforming Connections Data team on request.

Notes on this copy

This is the text of the response as submitted to Ofgem on 30 October 2026 in Ofgem's response template. It is set out here in this format in place of the template; the selections made in the template's tick boxes are shown under each question. My email address has been taken out. Questions not answered are omitted.

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Respondent: Mark D Moore, independent energy consultant. Nothing in this response is written for, paid for by, or about a client.