OFGEM CONSULTATION · RESPONSE BY MARK D. MOORE

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Transforming the Connections Experience

2026 policy consultation · Ofgem

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SCOPE
Five of eight questions answered

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Ofgem will report the causes of connection delays. The data reform won't record them. My proposal: one reason code, recorded once, used by every mechanism.

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Transforming the Connections Experience: 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 has decided to introduce minimum service requirements across the connections journey, an obligation to make ambitious yet achievable connection offers, strengthened Guaranteed Standards of Performance, liquidated damages for transmission, and public reporting of connection delivery performance. The reporting is to show how often connection dates are met, the causes of delays, whether those causes were within the network company's control, and trends over time (paragraph 3.82). I support the decisions. The connections data does not currently record the cause of a delay or the history of a date, and the Transforming Connections Data consultation does not propose a delay reason field (paragraph 5.92 of that document). Without them, three of the five reporting items cannot be produced, and GSoP exemptions and liquidated damages cannot be tested against what was recorded at the time. I propose a single controlled list of change and delay reasons, recorded once by the network company when a date changes, published in the registers, and used for compensation and reporting alike, together with the previous planned date and a data correction flag. The evidence is drawn from the NESO TEC Register, SSEN's Embedded Capacity Register and the ASTI regulatory dates.

Question 2.1.2. Are there any additional considerations relevant to the minimum requirements (decisions 2.1.1 to 2.1.7)? (1 to 2)

Question 2.2.1. Do you agree with the decisions for Ambitious Options for Customers (decisions 2.2.1 to 2.2.3)? (3 to 5)

Question 2.2.2. Are there any additional considerations relevant to this area? (6 to 7)

Question 3.1. Do you agree with the decisions for Timely and Reliable Connections (Decisions 3.1 to 3.3)? (8 to 10)

Question 3.2. Are there any additional considerations relevant to these areas? (11 to 15)

Other comments (16 to 19)

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2.1 MINIMUM REQUIREMENTS ACROSS THE CONNECTIONS JOURNEY

Question 2.1.2. Are there any additional considerations relevant to the minimum requirements (decisions 2.1.1 to 2.1.7)?

1 **Change notices and the public registers should agree.** Decisions 2.1.4(B) and 2.1.6 require a transparent change control process and notification of material changes within a fixed timeframe, and paragraph 2.124 commits to guidance on the format of change logs and version control. The

guidance should require that a material change notified to the customer is reflected in the relevant public register at its next edition, carrying the same reason code proposed under Question 3.2. At present a customer may be told of a change that the register does not show for several editions, or at all.

2 The guidance on the format of change logs should be developed jointly with the Transforming Connections Data (TCD) programme, so that the customer's change log and the published register change log use one definition of a material change and one list of reasons.

2.2 AMBITIOUS OPTIONS FOR CUSTOMERS

Question 2.2.1. Do you agree with the decisions for Ambitious Options for Customers (decisions 2.2.1 to 2.2.3)?

3 **Agree, with one qualification on Decision 2.2.2.** The principles-based obligation for ambitious yet achievable offers (Decision 2.2.1) and the opt-in mechanism (Decision 2.2.3) are supported.

4 The reasoning for not progressing a separate energisation window (paragraphs 2.171 and 2.172) is understood. Its consequence is that the principal connection date carries all of the information on delivery uncertainty. That date therefore has to be maintained, and its changes made visible. The evidence from SSEN's Embedded Capacity Register, read as published, is that this is not yet the case at distribution:

- in the October 2026 edition, 78 of 307 dated SEPD schemes awaiting connection (25%, 1,577 MW) carried a target energisation date already past, by a median of 7.5 months and up to 21.3 months; SHEPD shows the same pattern, with 90 of 360 schemes (25%, 1,958 MW);
- 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 (respondent's counts).

5 This concerns how the published dataset is maintained, not SSEN's delivery performance, and the register cannot show whether the customers concerned were told of new dates directly. It does show that a published date cannot currently be read as a live estimate.

Question 2.2.2. Are there any additional considerations relevant to this area?

6 **Ambition can only be tested against outturn.** Paragraph 2.190 defines an ambitious offer as one reflecting "the earliest realistically deliverable outcome". Whether an offer met that test can be judged only by comparing the date offered with the date delivered, across many offers. Decision 2.2.1 should therefore be monitored through the same reporting framework as Decision 3.3, with the date first offered retained alongside the current and actual dates. Without the first date, an offer revised several times after acceptance is indistinguishable from one that was right first time.

7 **Dependencies on reinforcement.** Where a connection date depends on wider reinforcement, the offer and the public register should identify the works by the Package ID proposed for the Transmission Owner Reinforcement Instruction in the TCD consultation. The customer can then see whether the connection date sits before or after the regulatory dates for those works. On the ASTI evidence set out under Question 3.1, more than half of the dated TEC Register entries at ASTI substations sit after the licence backstop date of the governing scheme.

3. TIMELY AND RELIABLE CONNECTIONS

Question 3.1. Do you agree with the decisions for Timely and Reliable Connections (Decisions 3.1 to 3.3)?

8 **Agree.** Decisions 3.1, 3.2 and 3.3 are supported. Decision 3.3 matters most to users who are not themselves the connecting customer, such as investors, lenders and local authorities, because it is the only one of the three that is public.

9 Paragraph 3.82 sets out what the reporting should allow customers to understand: how often milestones and connection dates are achieved; the scale and duration of delays; the causes of delays; whether delays arise from factors within or outside the network company's control; and trends over time. Each item is supported. Three of the five, however, cannot be produced from the connections data as currently published, or as proposed in the TCD consultation.

1. **Causes of delay.** The TCD consultation does not propose a delay reason field for the TEC Register (TCD paragraph 5.92), on the view that separate planned and actual connection date fields would give users sufficient context. A planned date and an actual date show that a delay occurred and how long it was. They do not show why.
2. **Within or outside the network company's control.** The same attribution is needed for GSoP exemptions under Decision 3.1 and for the separation of controllable and non-controllable delays under Decision 3.2 (paragraph 3.67). It depends on the cause being recorded at the time, not reconstructed afterwards.
3. **Trends over time.** These require the history of each date. The TEC Register replaces each edition with the next and carries no previous date. In the respondent's snapshot series, between the 20 and 27 October 2026 files, 14 entries changed connection month (excluding entries that also changed Gate label), and 13 of them returned to a month the same entry had carried on the 5, 13 or 16 October file. A user holding only the current file sees none of this movement.

10 The ASTI evidence shows why cause and attribution matter. 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 date of the governing ASTI scheme. 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. Published data cannot show whether those connection dates reflect a known reinforcement delay, a customer choice or something else. A reporting framework that cannot answer that question will report the frequency and duration of delay but not its cause, which is the item customers most need.

Question 3.2. Are there any additional considerations relevant to these areas?

11 **One reason code, recorded once, used by all three mechanisms.** Decision 3.3 commits to coordinating the reporting framework with the TCD programme. The coordination should take a specific form: a single controlled list of change and delay reasons, recorded by the network company when a connection date changes, carried in the public registers, and used without restatement for GSoP exemptions, LD attribution and performance reporting.

12 A suitable list, extending the one proposed in the respondent's TCD response, would be: planning and consents; land rights; outage availability; design change; equipment and materials availability; dependency on other works; customer request; data correction; other, with narrative. Each reason would also be marked as within or outside the network company's control. "Equipment and materials availability" conveys what users need without naming suppliers.

13 Recording the reason once has three advantages:

- the same delay is not classified one way for compensation and another for reporting;
- the reporting framework can be drawn from existing data, as paragraph 3.83 intends, rather than from a separate return;
- an exemption claimed under a GSoP, or a delay held to be outside a TO's control under an LD provision, can be tested against what was recorded at the time.

14 **The previous date.** Reporting trends requires the previous planned connection date, and the date it changed, to be retained, whether in the register itself or in a published change log.

15 **Data corrections.** Delay statistics should exclude data corrections, which is possible only if corrections are flagged. Gastard BESS (PRO-003552, 200 MW) and Lambeeth 240MW (PRO-004361, 240 MW) were absent from the 5 October 2026 TEC Register file and present, unchanged, on the 28 September and 13 October files. NESO confirmed on 23 September 2026 (enquiry 00125909) that the register carries no field marking a change as a correction. The TCD consultation already proposes a data correction flag for the Demand Capacity Register (TCD Table 1.1). Without an equivalent flag on every register, a comparative scorecard will count events that did not happen.

Other comments

16 **Relationship to the TCD response.** This response is made alongside the respondent's response of 30 October 2026 to the Transforming Connections Data consultation, which sets out the underlying evidence in full. The two are intended to be read together. Several decisions in this document depend on knowing why a connection date moved and whose action caused it; the published connections data does not currently record either.

17 **Basis of this response.** The evidence comes from published data, read edition by edition: a snapshot series of the NESO TEC Register from 14 August 2026; 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 their regulatory delivery dates against the connection dates of TEC Register entries at the substations they serve; 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.

18 **Questions not answered.** Questions 2.1.1, 4.1 and 4.2 are left blank, as the respondent has no evidence to offer on them.

19 **Evidence available to Ofgem.** The datasets referred to above are held by the respondent, with method notes, and can be made available to Ofgem's Connections Policy 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. My email address has been taken out. Questions not answered (2.1.1, 4.1 and 4.2) are omitted.

Consultation: Ofgem, Transforming the Connections Experience: 2026 policy consultation, published 25 September 2026, closing 6 November 2026. ofgem.gov.uk/consultation/transforming-connections-experience

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