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Question 1 - Do you generally agree with our overall initial positions on each of the foundational design options and key variations? Are there any foundational design options or key variations that we should have also considered?

We generally agree with ESO's position on all three foundational design options. More specifically, sticking with a Status Quo type process will only deteriorate all currently existing issues (huge amount of capacity in the queue, long lead connection timescales etc, inefficient network design).

The introduction of Gates as part of the connections process is an excellent idea as it will help ESO identify projects that are ahead in their development stages, which can then be prioritised and offered earlier connection dates, better connection terms etc. It is quite important to choose the correct set of criteria for progressing through a gate, to avoid prioritising projects that seem to be more well-defined but in reality, they aren't. Essentially, the criteria should be onerous enough to help identify those more realistic projects that are actually progressing but not too onerous as this would potentially cause delays and uncertainties, which might affect any financial business case.

With regards to centralised planning, this seems to be an extremely radical way to progress the proposed connections reform, as the philosophy is significantly different from the market-led approach that currently is in place. Additionally, our opinion is that it is no within ESO's remit to decide whether a centralised planning option is the correct approach, but rather should design a system to accommodate this approach if chosen by the associated stakeholders, e.g., Government, Ofgem etc.

Question 2 - Do you agree with our initial view that the current issues with the connections process could potentially be addressed on an enduring basis through other, less radical, and lower risk means than the introduction of capacity auctions?

We agree with ESO's view that this is a rather radical way to address any issues with the connections process, e.g., long connection queues etc. It is actually debatable whether separating connection and capacity would allow for quicker connection timescales, driven by a smaller amount of required enabling works. Given that the auction results cannot be known at planning and design stage, the network might need to be designed having a credible worst-case scenario in mind, which could lead to significant network overdesign. In addition, capacity auctions would increase development costs, which are likely to be transferred to the final customers in the form of increased bills.

In any case, as it has already been pointed out in the consultation, such a move would introduce significant uncertainty to developers and undermine their business case, as forecasting project revenues would become incredibly difficult and could only take place at a late development stage.

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Question 3 - Do you agree with our initial view that the reformed connections process should facilitate and enable efficient connection under either a market-based (i.e., locational signals) or 'centralised' deployment approach (or an approach somewhere between the two), but not mandate which approach to follow?

We agree with this view as we believe that it is not within ESO's remit to decide between a market-based or a centralised planning solution. This is something to be decided by Government and Ofgem, with ESO acting as an advisor.
ESO should rather design a reformed connections process that will be future-proof and will have the ability to accommodate any of the proposed approaches.

Question 4 - Do you agree with our initial recommendation that TMA A to TMA C should all be progressed, irrespective of the preferred TMO?

We agree that TMAs A to C should all be progressed, irrespective of the preferred TMO. The majority of the actions listed should be easy to implement, without requiring any code changes. There needs to be careful consideration, however, on how TMAs A and B are designed, e.g., the type of data that is shared, the level and type of engagement with the TO etc, so that the maximum benefits are provided to customers. TMA A (Key Data) is essential to deliver as the current level of transmission system data available cannot easily be used to pre-assess the potential of a candidate site or substation. TMA B (Pre-Application Meeting) is also essential to deliver a meaningful discussion with the TO planning/design team as it is instrumental to understand any potential constraints and opportunities associated with a candidate site or substation. As we are all aware, one-to-one pre-application meetings for England and Wales have been suspended for the last seven months and have been replaced by NGET's pre-app webinars. Although there is value in these seminars, they cannot fully substitute the direct engagement and source of information that was offered before, leaving a lot of developers uncertain with regards to the proposed development sites. This could potentially be one of the underlying reasons that the number of applications has skyrocketed even more over the past months, as developers are submitting more speculative applications in absence of more detailed network information or even with the hope of getting NGET to engage with them during the application assessment stage.

Despite deemed as easy wins and easy to implement from a process perspective, it must be noted that both ESO and TOs are currently under major strain and it is likely that there is a shortage of resources to design and implement these TMAs in the immediate future. This must be addressed as soon as possible to make sure that customers get meaningful pre-application support and that the level of speculative applications is minimised.

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Question 5 - Do you agree with our initial recommendation on the introduction of a nominal Pre-Application Stage fee, discounted from the application fee for customers which go on to submit an application within a reasonable time period?

It must be highlighted that the introduction of a pre-application fee is not something that we are against, as long as the quality of pre-application support is satisfactory and it provides meaningful/beneficial information to the developers. This of course assumes that there will be a complete redesign of the 'Key Data' that are publicly available and the pre-application engagement with the TO is going to be substantial, instead of the current regime of pre-application webinars.

It must be highlighted that the current level of publicly available information doesn't allow developers to make rather informed decisions on which transmission sites to apply for and whether their sites are unsuitable from the start. On top of that, assessing transmission capacity independently is rather tricky as the CPAs used for connection studies are not widely shared with the public. Therefore, it is highly likely that some developers end up being interested in unsuitable connection sites, meaning that an increased number of pre-applications will not progress into full applications, with the developers losing their initial deposit. Therefore, if the quality of the publicly available information is not improved, there should be a mechanism that developers can claim entire/part of their pre-application fee or even use it against a different project.

Question 6 - Do you agree with the importance of the TMA A 'Key Data'? Please provide suggestions for any other key data that you suggest we consider publishing at Pre-Application Stage.

As already mentioned below, TMA A 'Key Data' is crucial to help developers carry out high-level assessments of candidate connection sites/development sites, which will be further refined during the pre-application process. With regards to any additional key data that should be considered for being published at Pre-Application Stage, we suggest the following:

- It was mentioned in the consultation that both import and export capacity at the most granular level possible will be released. Apart from electrical capacity, however, what affects the majority of developers is **'physical' capacity** on the existing transmission connection sites. Essentially, any key data should include information on the availability of bays for connection at each connection site (number, type etc).

- Assuming that a full connectivity model is available in the future (or even just the GB 36 Bus Electricity Transmission Network Model), it would be useful to share further information on the **CPAs, background generation for worst case scenarios etc** if possible, so that independent assessment can be carried out during early stages to identify least congested areas.

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- Special consideration needs to be given on providing information on available capacity at the T/D interface, more specifically on available import/export capacity at Supergrid Transformers (SGTs). This is something that affects all sorts of distribution connected schemes, as the impact of every connection over 1 MW on the transmission system is currently being considered. Given that not all technologies have the same impact on SGT headroom, there must be additional clarifications on how each technology should be treated.

Just to highlight at this stage that any improvement in the quality and availability of data supporting the pre-application stage should be carried out **after the introduction of minimum requirements for an LoA at application stage**. Otherwise, this might lead to a significant increase in the number of speculative applications at connection sites/substations where capacity, either electrical or physical, has been identified.

Question 7 - Do you agree with our initial recommendation with regard to TMA D (requirements to apply)?

We agree with NGESO's initial recommendation with regard to TMA D. The standardisation and simplification of terms and conditions in the connection offer will reduce the number of errors that can be seen on provided grid connection offers (e.g., due to copying/pasting etc) and will alleviate some of the workload of TO/ESO personnel.

The most important element of TMA D, however, is associated with the introduction of a requirement for a Letter of Authority associated with a site's Red Line Boundary (RLB), similar to the process followed by DNOs. This is a really welcomed action as this move has the potential to drastically reduce the number of speculative applications that are currently overwhelming the system, as developers don't need to undertake much work on land prior to submitting an application. This requirement should be implemented as soon as possible (prior to the Connections Reform implementation) to avoid ending up with an extensive transmission queue (estimated to be around 600 - 700 GW by early 2025).

Along with the introduction of the LoA requirement, however, a detailed guide should be compiled and published by the ESO to list and detail any allowable changes associated with the RLB included at the application stage, e.g., under which circumstances land can be added or removed etc. It needs to be highlighted, however, that a **higher degree of flexibility should** be provided for transmission connection projects (compared to DNO allowable changes), especially for large-scale solar developments where land requirements are quite extensive (e.g., around 630 acres for 150 MW AC side) and split among several landowners. For example, an LoA from at least one participating landowner should be obtained before applying. If the land required for the project is in excess of the land included in the LoA, then as long as the

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initial LoA land is included in the final scheme, additional parcels of land should be allowed to be added to the project.

Question 8 - Do you agree with our initial recommendation with regard to TMA E (determination of enabling works), including that it is right to wait until the impact of the 5-Point Plan is known before forming a view on whether further changes to TMA E are required?

A lot of steps have been taken by NGESO over the past year to identify solutions and ways of planning the network to reflect real-world asset operation, and not excessive and unrealistic worst-case scenarios. The most notable of those are the change in the treatment of BESS and the adoption of higher attrition rates for contracted generation. On top of that, non-firm connections are planned to be offered to contracted generators to accelerate their connection date.

It is expected that the above should have a significant impact on the amount of enabling works that are required, hence leading to considerable money and time savings. Therefore, given their significant potential impact, it is right to wait and see the results of the above actions.

In any case, however, a plan B should be formulated for the scenario that the results of these actions are not as positive as expected and further incentives need to be brought forward.

Question 9 - Do you agree with our initial recommendation with regard to TMA F (criteria for accelerating 'priority' projects)?

TMA F3 (prioritising readier projects) should be treated as one of the foundation on which any connections reform process should be based on. Essentially, there needs to be a mechanism in place that allows more developed projects to be prioritised ahead of non-progressing, sometimes even speculative, projects. With regards to the proposed criterion for advancement, which currently is submission of major planning consents, we think that careful consideration should be given to its selection so that it is adequately onerous to prevent non-serious projects from progressing, but simultaneously not too onerous to cause any potential issues. (e.g., financial uncertainty, delayed delivery).

With regards to TMA F4 (e.g., auctions for quicker connection), we agree that this would probably favour more established developers with major financial backing. In addition, such an arrangement would increase development costs, which are likely to be transferred to the final customers in the form of increased bills. An option for mutual agreement between projects, however, to swap positions in the queue, within a window (after Gate 2) should not be fully discarded, assuming that a swap is technically feasible (similar TEC, similar location, similar technology etc).

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Question 10 - Do you agree with our initial recommendation with regards to TMA G (queue management)

In general, we believe that Proactive Queue Management (PQM), if adopted across the entirety of the process, could lead to the issues that were listed in the consultation document. Therefore, adopting Reactive Queue Management + (RQM+), which allows projects to progress without detriment to others, is the correct choice at this stage.

It must be highlighted, however, that the approach that is adopted in the preferred target model option (TMO4), where projects of the same window must compete for a position in the queue, without detriment to the backstop connection date, is a really smart idea which is probably one step above compared to RQM+.
With regards to the CMP376, we believe that this should be applied to all new and existing connection agreements (either retrospectively or via the Mod App route), so that existing projects that aren't progressing, without any reasonable justification, can be terminated and removed from the queue once their Milestones are missed. Otherwise, there will be no way to address the ~450 GW pipeline expected before CMP376 is approved.

Question 11 - Do you agree these four TMOs present a reasonable range of options to consider for a reformed connections process?

We agree that the different TMOs that have been presented in the consultation present a reasonable range of options, where there are a few combinations around the use of gates and application windows. Additionally, the extent of changes that are being introduced are gradually increasing from TMO1 to TM04.

Question 12 - Do you think any of the four TMOs could be materially improved e.g., by adding, removing, or changing a specific aspect of the TMO? If so, what, and why?
It is obvious that TMO4 is the solution that is providing the maximum number of benefits to the system, but it imposes the maximum level of constraint to developers, especially when it comes to flexibility for submitting an application. A way around this is smaller assessment cycles, e.g., 6-month cycles instead of 12-month cycles. This assumes, however, that the batched assessment can be carried out within 3-4 months, with application windows lasting around 2 months, which could be a stretch.

Additionally, given the relatively long duration of network assessment under TMO4, a significant improvement for TMO4 would be to ensure that the applicant is more involved in the network design process and even potentially establish a milestone halfway (e.g., 3 months after submission), where a

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meeting/engagement would take place with the applicant to discuss potential connection options and identify the best way forward.

Finally, a major concern for developers is whether their submitted application will be declared competent and be included in this batched assessment. Therefore, during the application window, NGESO/TOs (especially the TOs) should be more open to communication, more responsive and willing to engage with applicants/developers to address any of their technical queries. Essentially, as part of the new process, NGESO/TOs must provide the industry with the confidence that their applications will be reviewed thoroughly, any technical queries will be raised in due course and will be resolved (obviously with the help of the applicant) as soon as possible.

Unfortunately, TM02 and TM03 don't allow for progression of more developed projects, as even projects that have been through Gate 2, still need to wait for the projects ahead of them in the queue (FCFS) to be terminated based on Queue Management.

Question 14 - Do you think 'Submit Consent' is too early for Gate 2 in TMO2 to TM404?If so, what milestone should be used instead and why?

We believe that having 'Submit Consent' as the criterion for progressing through Gate 2 will lead to responsibly developed projects being disadvantaged over more speculative ones. This milestone will most likely lead to rushed planning applications being submitted to the responsible authorities so that a position in the queue and a sooner connection date can be secured. Essentially, this will motivate developers to rush through any pre-application consultations, or even avoid them, if possible, to make sure that a position in the queue is secured. On top of that, since all developers will be encouraged to progress with the submission of their planning application, even if it is not up to standards, this will potentially create a bottleneck in the associated planning authorities, as they will be inundated with planning applications of lower quality.

If the milestone for progressing through Gate 2 is 'Consent Granted', which is our preference, developers will be motivated to prepare more robust planning applications, so that they have a higher chance of success. This option, however, has some drawbacks as the final connection date (apart from the worst-case backstop connection date) is not known during the planning application submission, as well as any pre-application consultations. A way to overcome this is if NGESO/NGET were willing to provide some high-level information about how forward a connection date could be brought, depending on the position in the queue, e.g., first XX projects or first XX MW through Gate 2 could be brough forward by X years and so on.

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Question 15 - Do you agree that TMO4 should be the preferred TMO?

Based on the consultation data, TMO4 is the only option that can potentially address the current issues adequately, assuming that its implementation and the final design sticks to what has been described in this consultation process.

For example, this process could be accepted by the industry since the assessment cycles take place on a yearly basis (3 months window and 6-9 months for the offer preparation). If this gets extended and the duration of the batched assessment is increased (e.g., 12-15 months), this reformed process will eventually obstruct the development of a series of renewables projects, essentially jeopardising UK's net zero goals.

Question 16 - Do you agree with our design criteria assessment of the four TMOs?

In general, we agree with the results of the assessment shared in Page 72 of the consultation document. It is evident that TMO4 meets the design objectives and criteria more than the remaining TMOs. Even with TMO4, there are a number of challenges that need to be addressed during the detailed design and implementation stages.

Question 17 - What are your views on the stated benefits and key challenges in relation to TMO4?

It is evident that the deployment of windows for the submission of grid applications is the only option that can support a more coordinated and efficient transmission system and network design, leading to overall net consumer savings, which is that the remaining TMOs don't fully support.

With regards to the cumulative impacts that the model will have on connection dates, we agree that what is presented in TMO4 is a major improvement compared to the current framework, mainly due to the introduction of queue management and prioritising projects within the same window at Gate 2. It must be highlighted, however, that there is the possibility that TMO4's effect on earlier connection dates, although better compared to the remaining TMOs, might be rather limited. This is mainly applicable if backstop connections dates are far into the future. As a simplistic example, let's assume Window 1 projects (first window in 2025) have a backstop connection date of 12/2035 and Window 2 projects (second window in 2026) have a backstop connection date of 12/2038 (which in both cases is more than 5 years into the future). As stated in the consultation, there is no plan at this stage for projects from different windows to interact, e.g., readier projects from Window 2 to get prioritised over stalling Window 1 projects. Removing any stalling projects from the Window 1 will be solely based on Queue Management. As per CMP376, M3 Milestone (Land Rights) should be met 51 months prior to the contracted completion date, which will be in 09/2031. Assuming two months for remedial actions, the earlier that Window 1 might be terminated will

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be 12/2031. Therefore, Window 2 projects (even the ones that have been through Gate 2 quickly, will need to wait until 12/2031 (5 years minimum) before being prioritised over stalling projects from the previous Window.

Apart from the challenges that mentioned in the consultation document, some other challenges that can arise from the implementation of TMO4 are listed below:

- As rightly pointed in the consultation, there is a major concern that it will take a lot longer to provide a connection offer, with current estimates between 6-9 months from the closure of the application window. NGESO/TOs should commit to not extending the assessment windows any further, making sure that the duration of each round does not exceed one (1) year. This is extremely important as extending the timescales will be an impediment to the connection of new projects into the network (both transmission and distribution) which would derail UK's energy transition.
- NGESO/TOs should make sure that all necessary resources are in place to deliver this connection reform. For example, there is a chance that thousands of application might be submitted during the application window, which will need to be assessed and declared technically competent within a short timeframe. At the moment, developers are experiencing significant delays, sometimes more than 3 months, to get the clock on their applications started. This is mainly due to slow communication with TOs (mainly NGET) on any technical competency queries. As you may understand, this is not something that can be continued once the reformed process is in place, as it could easily derail the tight timescales of each assessment cycle
- A transparent appeal process should be put in place for any projects whose applications have been dismissed, as it would have huge impact on the development of the proposed projects (wait for next window).
- Finally, a major concern for developers is whether their submitted application will be declared competent and be included in this batched assessment. Therefore, during the application window, NGESO/TOs (especially the TOs) should be more open to communication, more responsive and willing to engage with applicants/developers to address any of their technical queries. Essentially, as part of the new process, NGESO/TOs must provide the industry with the confidence that their applications will be reviewed thoroughly, any technical queries will be raised in due course and will be resolved (obviously with the help of the applicant) as soon as possible.
- With regards to TM04, there is a slight uncertainty on the actual connection date, if brought forward when progressing through Gate 2. A way to overcome this is if NGESO/NGET were willing to provide some high-level information about how forward a connection date could be brought, depending on the position in the queue, e.g., first XX projects or first XX MW through Gate 2 could be brough forward by X years and so on.
- Another challenge that will need to be addressed during the detailed design stage, is how the existing queue, which will most likely reach 600 - 700 GW by the time of implementation, will be treated and transitioned to the new connections reform process. It is essential that no customers, either existing or new, are disadvantaged by the new connections reform process.

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Question 19 - Do you agree with our views on DNO Demand in respect of the TMOs

There needs to be a more flexible way to incorporate any distributed demand connections into the reformed connection process. Assuming that TMO4 is the preferred connection option, there needs to be an increased number of windows for DNOs (potentially two per year), to give the opportunity to DNOs to cover any shortfall in their demand forecasts if these are exceeded by the amount of contracted distribution demand at each GSP.

Ideally, each DNO should be provided with each GSP's demand technical limits and only have to go through the new TMO process once these limits are exceeded by new demand connections. Essentially, any forecasted demand uptake at each GSP could be communicated within the Week 24/48 process, to notify NGESO/TO of the new connections. This option, however, assumes that there will be a clear decision between DNOs/TOs/NGESO on how BESS import will be treated and how it will affect the demand headroom at each GSP.

With regards to additional application entry requirements on distribution demand projects, as stated in Page 82 of the consultation documents, this is something that should be under the jurisdiction of the relevant DNO and not NGESO.

Question 20 - Do you have any views on the appropriate mechanism to incentivise accurate forecasting of requirements and avoid more RDC than is necessary being requested by DNOs?

Unfortunately, there could be an issue associated with the need for the DNO to forecast the required RDC for each assessment cycle (assuming that it is only one per year). This can be easily seen from the latest FES projections.

For example, under 'Leading the Way' scenario, the forecasted storage capacity for 2035 is 28.69 MW, whereas the currently contracted storage capacity is 141.69 MW. Therefore, despite the fact the there is a tool that can forecast how much storage capacity (or other capacity) will be required, the level of applications and eventually contracted schemes might exceed this significantly. It is understood that not all schemes will go ahead and connect eventually, but all of them will need to go through the TMO process and get a capacity allocated to them (CPAs will apply).

Therefore, it is highly likely that any RDC forecasts from the DNO will not be accurate, which will potentially lead to extended waiting times for accepted distribution schemes, assuming that there will be only one window per year.

Therefore, to mitigate this issue which will inevitably materialise, there should probably be more than one window within one assessment cycle (yearly cycles), that will allow DNOs to address any shortfalls in the forecasted RDC.

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Question 21 - Do you agree with our views on the process under which DNOs apply to the ESO on behalf of relevant small and medium EG which impacts on or uses the transmission system, including that (under TMO4):

- **DNOs should be able to request RDC via application windows to allow them to continue to make offers to EG inter-window; and**
- **resulting offers should be for firm access until relevant EG has reached Gate 2 (at which point they can request advancement and an earlier non-firm connection date)?**

In general, we agree that DNOs should be able to request RDC via an application window so that they can continue make offers during the remainder of the assessment cycle.

There needs to be, however, a more flexible way to incorporate any distributed generation connections into the reformed connection process. Assuming that TMO4 is the preferred connection option, there needs to be an increased number of windows for DNOs (potentially two per year, Window A and Window B), to give the opportunity to DNOs to cover any shortfall in their RDC forecasts if these are exceeded by the amount of contracted distribution generation at each GSP. Any additional schemes at Window B, however, will be included in this assessment cycle and be treated the same way as the other distribution schemes from Window A.

By treating the distribution accepted schemes similar to the transmission contracted ones, namely making them part of a batch and allow them to progress faster once through Gate 2, the issue with managing a complicated and extremely long transmission/distribution queue disappears, as it is split down to multiple smaller queues, one for each assessment window.

With regards to non-firm access to the transmission system, the arrangements for TMO2, TMO3 and TMO4 are identical as this can be provided only when the associated enabling works are fully identified. Therefore, unless this principle is amended, there shouldn't be any issues affecting distribution connecting schemes more adversely that others.

Question 27 - Do you agree with our initial recommendation related to each of the TMAs within this chapter? If so, why? If not, what would you change and why?

Regarding TMA H1, our opinion on the nominal advance for the pre-application stage can be seen in question 5 above.

With regards to TMA I, there is no reason currently for ESO to reject an application, other than the offshore wind scenario that was included in the consultation. The connection reform process should be designed in

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a way to accommodate such a need (if it ever materialises), but there should be clear and transparent criteria as well as a dispute mechanism to deal with any complaints.

As already mentioned earlier in this consultation, it would be highly beneficial to establish a milestone halfway the assessment cycle (e.g., 3 months after window closure if TMO4 is progressed), where a meeting/engagement would take place with the applicant to discuss potential connection options and identify the best way forward. This should be more easily facilitated if TMO4 is the final proposed model, given the rather long timescales required for the batched assessment.

With regards to TMA R, management of underused capacity is definitely something that needs to be considered, if it is a phenomenon that is often encountered. Of course, there should be clear rules on when capacity shall be relinquished and a process where the developer/generator can appeal and justify the reasons for underusing their contracted TEC.

Finally, TMA S1 is something that needs to be progressed as a priority, especially if TMO4 is deemed is the final proposed solution. This is mainly due to the huge impact of not being included within a window assessment on the project development.

Question 29 - Do you agree with our current views in respect of transitional arrangements? What are your views on how and when we should transition to TMO4?

As seen in the consultation, there is a fairly lengthy implementation period and therefore there is a risk of a prolonged transition period. The main risk associated with this is that the connection will carry on increasing, most likely at the same rate as over the past months (~25 GW/month). This could potentially lead to a queue of around 600-700 GW by early 2025. Based on this, it is self-evident that the new reformed process should be implemented sooner rather than later, as the current system has objectively failed.

With regards to any actions during the transition period, the key goal is to have CMP376 approved by Ofgem so that Queue Management Milestones can be entered into new connection agreements, and also retrospective to old ones if possible. If the existing connections queue is not successfully cleansed, no proposed TMO will be in the position to deliver any meaningful change.

Another key action during the transition period is to minimise the number of applications that enter the system. A simple yet effective way to do so is to immediately establish the requirements for LoAs at application stage (see our reply in question 7 above). After the LoA requirement is established, improving any available pre-application information along with better engagement with the TO is the next crucial step. The two actions listed above, and in this order (1. LoA – 2.Pre-App Info), should be adequate to keep the number of application at an acceptable level.

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Question 30 - What further action could Government and/or Ofgem take to support connections reform and reduce connection timescales, including in areas outside of connections process reform?

The key actions that Government/Ofgem can take to facilitate and support connections reform are mainly associated with managing existing projects in existing queue and how CMP376 (Queue Management) will be eventually implemented. It is no secret that NGESO/Ofgem are mindful of the reaction of existing legacy schemes when Queue Management Milestones are going to be inserted in their connection agreements. Therefore, there is a chance that political intervention might be required to address this issue and progress with the rationalisation of the connections queue.

Finally, there needs to be an amendment of the policy associated with SGT charging, when reinforcements are triggered by distributed connected projects. More specifically, SGT reinforcements are currently funder by the customer(s) triggering the works. The cost is split between the triggering schemes based on accepted capacity, with allocated costs increasing if some of the triggering schemes terminate their offers. As you may understand, this is a huge risk to developers as the expenditure associated with a connection project cannot be forecasted easily, leading to issues with securing financial investment. It must be highlighted at this stage that if the GSP is a shared site (more than one DNOs supplied or tertiary connected customer), there is no capital contribution applied to the connecting customers as the reinforcement costs are socialised (retrieved via TNUoS charges). Therefore, there is clear inconsistency in the treatment of distribution connected schemes when it comes to SGT charging, which is mainly dependent on the location of the project (e.g., connection or shared GSP site). This need to be amended the soonest possible with SGT reinforcements charges being applied on the basis of a Cost Apportionment Factor (requested capacity/new network capacity), as a minimum. The other option would be to have these charges socialised, either via DUoS or TNUoS.