



27 February 2026

Dear Sir/Madam,

Citizens Advice welcomes the opportunity to respond to Ofgem's consultation on the *Connections End-to-end Review – Updated Proposals and Next Steps*. We are the statutory consumer advocate for energy consumers in Great Britain. This response is not confidential and may be published on your website.

Having reviewed the proposal, we set out our feedback below.

Executive Summary

We broadly support Ofgem's proposed decisions and overall approach to improving the electricity connections process.

Our response focuses in particular on Theme 3 (meeting connection dates), Theme 4 (quality of connection offers and associated documentation), and Theme 6 (minor and smaller connections). These areas are central to improving transparency, strengthening accountability, and ensuring consumers experience reliable and fair outcomes throughout the connections journey.

We support the introduction of a strengthened Guaranteed Standards of Performance (GSOP) framework, including clearer and more robust milestones, while allowing flexibility to reflect customer circumstances and project complexity. We also support automatic and meaningful compensation, adjusted over time through an inflation mechanism, to better protect customers when standards are not met.

Greater transparency in GSOP data is essential. We recommend that Ofgem requires network companies to provide monthly breakdowns of GSOP performance, publish this information quarterly, and ensure the data is easily accessible and comparable, both

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across companies and over time, for customers and stakeholders. We also support further exploration of liquidated damages in connection contracts, provided these are carefully designed to strengthen accountability without creating unintended consequences for consumers.

We support Ofgem's proposals to improve the quality of connection offers, including the introduction of minimum standards through licence conditions. However, these should be supported by a standardised connection offer template and clear guidance to ensure information is presented consistently and accessibly across networks. Connection offers should clearly set out expected timelines, explain risks and causes of delay, and clearly signpost redress and escalation routes. Principles-based requirements for communication should be supported by effective monitoring and enforcement to prevent inconsistent implementation and to ensure better consumer outcomes.

Finally, we support Ofgem's approach to improving outcomes for minor and smaller connections, but stress that delivering real benefits in practice will depend on strong implementation. Customer circumstances and vulnerability should be taken into account when applying new standards, alongside clear and accessible communication so customers understand the process, know what to expect, and understand their options for redress.

Strong monitoring and enforcement will be essential. We recommend that Ofgem requires monthly connection performance data, publish it quarterly in a comparable format, and consider using financial penalties, in addition to customer compensation, to create meaningful incentives for improved performance.

The detailed recommendations underpinning these views are set out in our full response below.

Response to questions

Q3.1. Do you agree with Decision 3.1 to introduce a strengthened GSoP framework targeting connection dates? Do you have any views on specific design points, e.g., how should the value be set, should it be tailored to different customer types, what milestones should they be set against etc?

Yes, we agree with Decision 3.1 to introduce a strengthened GSOP framework targeting connection dates. We support tightening GSOP requirements, including clearer and

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more robust milestones, expanding GSOP coverage where appropriate (including Transmission Owners), and increasing compensation levels to strengthen incentives and better protect consumers.

Evidence from our *Standard Issue Update* (2024) shows that electricity network companies met connection Guaranteed Standards of Performance (GSOPs) in 99.59% of cases on average between 2018/19 and 2021/22. While this headline figure suggests strong overall performance, results were weaker for the accuracy of quotations, with compliance averaging only 80% for ECGS11A and 11B.¹ Although this is partly explained by the low number of cases, which makes the data volatile, it also suggests there is scope to strengthen the framework to better reflect areas where consumers experience issues.

Our views on GSOP design points include the following:

- Compensation and enforcement: Where a network company fails to meet a GSOP, compensation to the affected customer should be automatic and meaningful. Compensation levels should be clearly explained, including how values are set and how they are adjusted over time through an inflation mechanism.
- Milestones and scope: GSOPs should be linked to clear and relevant milestones across the connection journey, particularly those that matter most to customers, such as meeting agreed connection dates and providing accurate quotations.
- Tailoring to customer circumstances and complexity: We support having different targets that reflect both the customer's circumstances and the complexity of the work. This would help ensure fair outcomes, particularly for customers in urgent situations or those at risk of harm, while recognising that more complex projects may reasonably take longer.

Overall, a strengthened GSOP framework, supported by clearer milestones, appropriate compensation levels, and flexibility to reflect customer needs and project complexity, would help improve accountability and deliver better outcomes for connection customers.

Q3.2. Do you agree with Decision 3.2 to develop mechanisms to ensure GSoPs are accurately reported publicly?

¹ [Standard Issue Update](#) p.18

Yes, we agree with Decision 3.2 to develop mechanisms to ensure that GSOPs are accurately and transparently reported to the public. Improving the visibility and quality of GSOP data is essential for effective scrutiny and accountability.

In our *Standard Issue Update*, we recommended that Ofgem require network companies to provide monthly GSOP performance breakdowns.² We also believe Ofgem should move away from publishing GSOP performance solely as part of the annual ED report and instead publish performance data more frequently. Publishing quarterly would provide a much clearer picture of when network companies meet or fail to meet standards, help identify periods of poor performance more quickly, and avoid reliance on annual averages that can mask underlying issues.

We strongly support greater transparency of GSOP data. Ofgem should publish the full GSOP dataset, rather than limited summaries, as current reporting does not fully disclose performance information. Publishing the complete dataset would provide greater transparency for customers and stakeholders and create a clearer and simpler way to monitor performance over time.

In addition, we would like this data to be easily accessible to consumers, including being published in a prominent location on Ofgem's website. To further improve accessibility and usability, Ofgem should consider publishing the data regularly to enable performance tracking. And Ofgem should ensure the data is presented in a comparable and user-friendly way, including visualising data (such as charts, tables, and summaries) where possible to help consumers understand how network companies are performing, enabling customers and stakeholders to scrutinise performance more effectively.

Overall, ensuring GSOP data is accurate, complete, and published in a timely and accessible way would strengthen accountability and help drive improvements in network company performance.

Q3.3. Do you agree with Proposal 3.1 to explore further the introduction of liquidated damages as standard into connection contracts? Why do you consider liquidated damages are not currently inserted into contracts between the customer and the network company?

² [Standard Issue Update](#) p.9

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Yes, we agree with Proposal 3.1 to explore further the introduction of liquidated damages as standard in connection contracts. Liquidated damages could help strengthen accountability, provide clearer incentives for timely delivery, and give customers greater certainty where network companies fail to meet agreed timescales.

Liquidated damages are not commonly included in connection contracts largely due to the uncertainty involved in delivering connection projects. Timely delivery often depends on factors outside a network company's direct control, such as planning permission, land access, coordination with third parties, and supply chain constraints. As a result, network companies may view the risk of financial penalties as too high.

In practice, liquidated damages clauses in construction agreements are often set at zero value,³ which means they do not transfer any real risk. Introducing meaningful liquidated damages into connection contracts would therefore shift risk from customers to network companies.

There are also concerns that the costs of liquidated damages could be passed on to consumers, particularly smaller customers with less bargaining power. These risks highlight the importance of careful design. Any introduction of liquidated damages should be proportionate, clearly defined, and designed to protect consumers, while ensuring that risks outside a network company's control are treated fairly.

Overall, we support further exploration of liquidated damages, provided they are introduced in a way that strengthens accountability without leading to unintended cost impacts for consumers.

Q4.1. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

Overall, we are supportive of the decisions and proposals set out in this theme, but we have a small number of additional comments that we believe would strengthen their impact for consumers.

³ [Timely connection to the electricity transmission network](#) p.2

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For Decision 4.1, we agree with the introduction of minimum standards for connection offers through prescriptive licence conditions. Clear minimum requirements should improve transparency and help customers better understand their options, costs, and risks at an early stage.

However, we do not think minimum standards alone will be sufficient. To ensure consistency and usability, Ofgem should support this approach with a standardised connection offer template, alongside clear examples of good practice. This would help ensure information is presented in a consistent and accessible way across all network companies and give consumers a clearer understanding of what information they should expect.

In addition, we believe connection offers should clearly set out expected timelines for each key stage of the process, so consumers understand when approvals, works, and connections are likely to take place. Offers should also explain any potential risks or causes of delay, including which factors are within the network company's control and which are not. Finally, connection offers should clearly signpost redress and escalation routes, including how consumers can raise concerns, what will happen if agreed timescales are missed, and where consumers can go if a dispute cannot be resolved directly with the network company. While the Energy Ombudsman offers a formal route for independent dispute resolution, Citizens Advice, as the statutory advocate, can play an important supporting role by helping consumers understand their rights, navigate complex processes, and escalate complaints where necessary.

For Decision 4.2, we support the introduction of a principles-based licence condition focused on clarity of communication and engagement. However, we are concerned that, without clear guidance and oversight, networks may interpret the same principles in different ways. This could lead to uneven implementation, inconsistent service quality, and variable customer experiences across networks. We also have concerns about monitoring and enforcement. Without clear mechanisms to assess compliance, it may be difficult for Ofgem to identify when principles are not being met or to take action where performance falls short. We therefore believe principles-based conditions should be supported by clear guidance, monitoring, and accountability mechanisms.

For Proposal 4.1, as set out in our SSMC response, we support bringing low-carbon technology (LCT) connections and related enabling works into scope and incentivising them. This should help deliver a faster and more consistent experience for customers. We support setting clear targets for approval, quotation, and connection, with flexibility

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to reflect both customer circumstances and the complexity of the work, particularly to prevent harm to vulnerable customers. We also agree that incentives should include both rewards and penalties, be based on relative performance between network companies, and be funded through penalties rather than consumer bills. Finally, we believe the incentive should apply to both domestic and non-domestic customers, particularly small businesses, to ensure fair treatment across customer groups.⁴ In this context, we suggest that Ofgem consider whether the compensation levels for the Connections GSOP should differ between domestic and non-domestic customers, as is already the case for interruption payments. This would recognise that the financial impact and inconvenience of delayed connections can vary by customer type, and may be greater for non-domestic customers such as small businesses.

Taken together, these changes would help improve transparency, consistency, and accountability across the connections process, while ensuring a strong focus on consumer outcomes.

Q6.1. Do you agree with our five decisions, and our planned approaches to taking them forward?

Overall, we agree with the five decisions and the proposed approach to implementing them. Together, these measures have the potential to improve consistency, transparency, and customer outcomes.

However, we believe there are a few additional points to consider to ensure the decisions deliver real benefits in practice.

- Customer circumstances and vulnerability should be taken into account when applying new standards to help prevent consumer harm, particularly in urgent or sensitive situations.
- Clear, accessible communication with consumers will be essential to ensure they understand the new standards, what to expect from network companies, and what to do if those standards are not met.
- The success of these decisions will depend on strong monitoring and enforcement to ensure standards are applied effectively and lead to meaningful improvements in performance.

⁴ [ED3 Sector-Specific Methodology Consultation - Citizens Advice response](#), p.30-32

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Addressing these points alongside the proposed approach would help ensure the five decisions deliver better and fairer outcomes for consumers.

Q6.2. For Decision 6.1 – We understand that the time required to complete connection activities can differ depending on the scope of work. To help us establish appropriate expectations, we would welcome your views on suitable timeframes for the DNO to complete the following activities once the customer submits a formal application/request: i. fuse upgrades ii. cut out upgrade iii. three-phase supply upgrades iv. service cable upgrade v. unlooping (reactive)

We do not have a firm view on the specific timeframes that should apply to each connection activity. However, we would expect Ofgem to clearly explain how any proposed timeframes are set and the evidence supporting them. This transparency would help build confidence that the chosen timeframes are fair, achievable, and focused on delivering good outcomes for customers.

Q6.3. For Decision 6.2 – What information could DNOs provide, clarify, or signpost to, which would make the connections application process simpler for installers/customers? For example, what sort of information could they provide on their websites?

We agree that clearer, more consistent information from DNOs would make the connection application process simpler for both installers and customers. In particular, we believe DNOs should provide clear, accessible information on their websites covering the following areas:

- Step-by-step guidance on the connections process, outlining what happens at each stage, the information required from the customer or installer, and typical timescales.
- Standardised explanations of connection options, including plain-language descriptions of G98, G99, and G100, as well as different upgrade options and their pros and cons, to reduce confusion and misinterpretation.
- Clear signposting to support and escalation routes, including who to contact with questions, how to raise concerns, and what steps to take if standards are not met or disputes arise.

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- Consistent templates and forms, such as standardised application forms and technical information templates, are used across all DNOs to reduce complexity for installers and customers working across different network areas.

Providing this information consistently across all DNO websites would improve transparency, reduce complexity, and help address inconsistencies across networks, leading to a better overall customer experience.

Q6.4. For Decision 6.3, how could Ofgem strengthen its approach to monitoring, reporting, and enforcement when poor performance is identified? What – in respondents’ views - should be the frequency of DNO reporting?

We support Ofgem’s intention to strengthen reporting requirements for connections and believe this is essential to improving monitoring, transparency, and accountability.

To strengthen its approach to monitoring and reporting, Ofgem should require network operators to submit monthly GSOP performance data. In our *Standard Issue Update* report, we recommended that these monthly breakdowns be provided.⁵ This would allow Ofgem to see how performance changes over the year, identify periods of poor performance more easily, and avoid relying on annual averages that can mask underlying issues.

We also believe GSOP performance data should be published more frequently. An annual publication does not provide sufficient visibility, while a quarterly publication would be more appropriate and timely. In addition, Ofgem should publish the full underlying dataset, rather than only high-level summaries, as the current annual electricity GSOP report discloses limited information. Greater transparency would support scrutiny and drive performance improvements.

Alongside this, Ofgem should publish comparative performance data across DNOs, such as average connection approval times and average completion times by different types of connection projects. Publishing comparable performance data would make it easier for stakeholders and consumers to understand how different network operators are performing relative to one another, and would create stronger reputational incentives for improvement.

⁵ [Standard Issue Update](#) p.9

To strengthen enforcement, Ofgem should clearly set out the steps it will take when network operators consistently fail to meet minimum standards. While compensation for affected consumers is important, it should not be the only consequence. Where poor performance persists, Ofgem should impose financial penalties to ensure meaningful incentives for network companies to meet the required standards.

Overall, a combination of more frequent and transparent reporting, publication of comparable performance data, clear escalation processes, and stronger enforcement would significantly improve Ofgem's ability to identify poor performance early and drive sustained improvements for consumers.

Q6.5. Do you have any additional comments in relation to the decisions and proposals outlined in this theme? Do you have any additional comments related to any other aspects of this theme you think we should consider?

In addition to the proposals outlined above, we believe it is important that Ofgem considers the use of qualitative measures, such as customer experience and service quality, alongside GSOP performance data. While GSOPs are a useful tool for monitoring minimum standards, they do not provide a full picture of the customer journey or how customers experience the connections process in practice.

As we set out in our ED3 SSMC response, we support the proposal to separate survey responses relating to connections, particularly minor and 'micro' connections (i.e. requests that are not new connections), and incorporate these into the new smaller connections incentive.⁶ This would allow for better scrutiny of performance and create a clearer incentive for network companies to improve the overall connection experience.

Combining quantitative GSOP data with qualitative customer feedback would provide a more complete and meaningful assessment of performance and help drive improvements where they matter most to consumers.

Best regards,

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⁶ [ED3 Sector-Specific Methodology Consultation - Citizens Advice response](#), p.33

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