



Queue Management Milestones

2026

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1. Purpose of this Policy

- 1.1. In September 2025, the ENA issued Version 6.0 of their Queue Management User Guide. The purpose of this update was to reflect the requirements of the Connections Action Plan and the broader Connections Reform work on the overall connections process. This document is to demonstrate Green GEN Cymru's interpretation of the ENA Queue Management guidance and how we intend to implement Queue Management across connections to our network.

2. Scope

- 2.1. This policy applies to all connections to the Green GEN Cymru network where the Customer has been assigned a queue position.
- 2.2. Under Connections Reform, Customers who are required to be assessed for their impact on the Transmission System (as discussed further in section 7) will not be assigned a Transmission queue position until they have been assessed by NESO and Green GEN Cymru has received and accepted an offer from NESO accordingly. Therefore such Customers will not be assigned a Distribution queue position until such time, and any offered connection date, and/or Point of Connection will be purely indicative. Upon demonstration of readiness for Gate 2 ahead of an upcoming NESO Gated Window, Green GEN Cymru will prepare an updated offer including an updated offered connection date, connection cost and Point of Connection. This Queue Management policy will only be applied from when such Customers accept a variation to their Connection Offer Agreement reflecting the assessment made by NESO (termed a Gate 2 Variation Offer).
- 2.3. Customers who are not required to be assessed for their impact on the Transmission System will not require a Transmission queue position and such Customers will be assigned a Distribution queue position upon acceptance of the offer of connection. The offered target connection date, connection costs and Point of Connection will be definitive (albeit subject to the terms of the offer).

3. What is Connection Queue Management?

- 3.1. Connection Queue Management is the process by which network companies manage Projects that have not yet connected to their networks and are currently considered to be in the connection queue. It enables network companies to act on contracted Projects if they are not progressing against the Connection Milestones, therefore minimising the impact of stalled or slow-moving Projects on other Projects in the relevant network's queue. Connection Queue Management is used to provide a consistent basis on which Projects are required to reach specified milestones and may also be used to remove a Project from a network's connection queue where the Project is delayed compared to its Connection Milestones. Where this occurs and where Projects are unable to get back on-track within reasonable timescales, network companies would take steps to terminate the agreement.
- 3.2. The main components of Connection Queue Management are:
 - 3.2.1. Connection Milestone(s), which are also referred to as Milestone(s) - these form the agreed benchmarks by which DNO/IDNOs and their Customers can measure and track Project progress towards a contracted connection date. Customers will be required to submit to the DNO/IDNO the required evidence confirming that a Milestone has been met. Following review, the DNO/IDNO will then confirm to the Customer that the DNO/IDNO agrees the Milestone has been met. The Milestone will be considered met on the date on which the DNO/IDNO confirms that the required evidence meets all necessary criteria and standards.
 - 3.2.2. Milestone dates – Milestones include a contracted date based on the Offer Acceptance Date, or the Offered Connection Date, if this is more than 5 years after the Offer Acceptance Date. Each date reflects the latest date by which the Customer must meet the Milestone, but Customers may meet the Milestone before that date.
 - 3.2.3. Milestone Remedy Notice – this is the notice by which Customers will be informed of overdue Milestone dates and the length of time permitted for remedy if a Milestone date is not met. By using Milestones and remedy timescales, delayed Projects can be identified and agreements potentially terminated to make connection capacity available for Projects that are progressing in line with their Milestones. The application of Connection Queue Management in a clear and consistent way to remove delayed Projects from connection queues ensures that network

capacity is available for other Projects that are ready to progress. These could be Projects that are already in the connection queue or new connection applications.

4. Why is a Connection Queue Management process needed?

- 4.1. Some areas of the distribution and transmission networks have more limited capacity for new customer connections than others. When this capacity is fully used, network reinforcement may be required to create additional capacity, which can involve significant cost and time for connecting customers.
- 4.2. When assessing new connection requests, network companies must also consider customers who have accepted connection offers but are not yet connected. These contracted but unconnected customers form queues, and if they fail to progress by meeting their Connection Milestones, it can negatively impact subsequent customers wishing to connect (e.g., causing delays).
- 4.3. By applying agreed milestones and remedy periods, delayed Projects can be identified, and agreements terminated if necessary. This approach frees up connection capacity for Projects that are progressing in line with their milestones or for future connections.

5. What are Connection Milestones?

- 5.1. Connection Milestones form the basis of the Connection Queue Management process and are included in agreements to measure the progress of a Project towards meeting its connection date. This allows Customers and network companies to have better visibility of a Project's progression and to identify risks where Projects are delayed against the Milestones. Milestones provide clear signals of when Projects will be defined as delayed and may, therefore, be blocking capacity that could be used by other Projects.
 - Milestones represent the completion of key stages in the delivery of Projects that aim to connect to electricity networks to export (or generate) electricity, to import electricity (or take supplies) or to both export and import electricity.
 - Milestones are intended to be transparent and realistic, with an expectation that Customers will have undertaken relevant development activity to assess the feasibility of Projects before accepting a connection offer.
 - Each Milestone has a timescale attached to it and evidence is required to confirm that the Milestone has been met.
 - Once a Customer accepts the connection offer, the Customer is responsible for providing suitable evidence to demonstrate that the relevant milestones have been met within the specified timescales. Failure to provide this evidence will lead to Green GEN Cymru initiating the Milestone Remedy Notice process.
 - While these principles could apply to all Projects, the standard timescales may not apply to Projects requiring Development Consent Orders (DCO) (or Developments of National Significance and Infrastructure Consenting regime in Wales, collectively termed "DNS" schemes) due to the relatively small number of this type of Project and more complex planning requirements. For such Projects, bespoke timescales would be agreed between the parties on a case-by-case basis, but it is recognised that timescales to secure statutory consents could increase to around 36 months.
 - We have used a combination of the ENA Guidance, Welsh Government guidance in relation to standard timescales and our own experience to determine indicative milestone timelines for DNS schemes in Wales.
 - In all cases, Milestones need to be realistic and consistent with the offered or desired connection date. That means they must be both achievable in themselves and align with the work and timescales the Customer needs to permit, finance, construct and commission its particular Project. Customers are expected to submit a realistic overall programme as part of their connection application and Green GEN Cymru will review this prior to setting the Milestones in accordance with this guidance.
- 5.2. Once a Milestone is met and has been accepted by Green GEN Cymru, the expectation is that this will continue to be the case without need of further evidence that the necessary conditions remain in place. Any change to the status of a completed Milestone (e.g. change in land ownership or planning status) should be raised with Green GEN Cymru as soon as possible.

6. Connection Milestones Timescales

- 6.1. Table 2 in Section 7 details the timescales for meeting the Milestones, working forward from the Offer Acceptance Date, provided the Offered Connection Date is not more than five years from the Offer Acceptance Date.
- 6.2. Where any Offered Connection Date exceeds five years from the Offer Acceptance Date, Connection Milestone dates will be calculated working back from the Offered Connection Date, in line with the NESO Connection Milestone process for Transmission Connected Projects.
- 6.3. For the purposes of this exercise the Offered Connection Date is the later of the date offered by Green GEN Cymru and the date on which the Customer is allowed to use (or deemed to use) the Transmission System, pursuant to the TEA process.
- 6.4. Table 1 below sets out the Milestones where the Offered Connection Date is more than 5 years from the Offer Acceptance Date. Where the date derived from this table is earlier than the usual forward-looking date, the later of the two dates shall be used.

	Milestone Date: Calculated back from the Offered Connection Date by this period:	Example: In October 2026 Green GEN Cymru makes an offer with a Connection Date of 1 January 2038
M1 – Initiate Planning Consent	48 months	1 January 2034
M2 – Secure Planning Consent	30 months	1 July 2035
M3 – Secure Land Rights	51 months	1 October 2033
M4 – Establish Transmission Interface	N/A	N/A
M5 – Submit Contestable Design	21 months	1 April 2036
M6 – Agree Construction Plan	18 months	1 July 2036
M7 – Project Commitment	15 months	1 October 2036
M8 – Initiate Construction	12 months	1 January 2037

Table 1

7. Connection Milestones and Transmission Assessment.

- 7.1. A key factor in determining Milestones for DNO/IDNO connections is whether a Transmission Evaluation Application (TEA) is required. Green GEN Cymru will identify and clarify with the Customer if a TEA is required during the application and offer process. At the time of publication, demand applications do not generally require formal Transmission evaluation but this will be assessed on a case-by-case basis. Thresholds for DNO/IDNO generation connections requiring a TEA are as per the sections below. Please note that such requirements and thresholds will be applied in accordance with the provisions of the CUSC or as advised by NESO, and may change from time to time.
 - 7.1.1. Generation schemes with a capacity equal to or greater than 5MW in England and Wales or equal to or greater than 200 kVA in Scotland (or equal to or greater than 50kVA on Scottish Islands); and
 - 7.1.2. In England and Wales, if there are fault level issues at the relevant Grid Supply Point then a TEA will be required for Projects with a capacity equal to or greater than 1MW. Contact Green GEN Cymru to confirm whether this will apply to your connection.
- 7.2. Where the TEA process is required for generation, this will follow the Gated Application and Offer Process as set out in the CUSC (termed here the TEA Gated Process) and will have milestone dates set according to that designation. Demand that requires assessment will follow the TEA Non-Gated Process. In each case there may be differences where DCO or DNS planning have to be followed. Taken together with Projects that do not need assessment, there are therefore five possible processes and the timing of Pre-Construction Milestones, as summarised in table 2 below.

Process	M4 – Establish Transmission Interface	M1 – Submit Planning Permission	M2 – Secure Planning Permission	M3 – Secure Land Rights	M6 – Establish Construction Plan
TEA Gated Process for local authority permitted Projects	Acceptance of Gate 2 Variation Offer.	2 months from M4 or 12 months from M4 if pre-planning requirements are evidenced.	12 months from M1 completion	If not already secured, then date of completion of M4	6 months from completion of M2
TEA Gated Process for DCO or DNS Projects	Acceptance of Gate 2 Variation Offer.	14 months from M4	15 months from M1 completion	If not already secured, then date of completion of M4	6 months from completion of M2
TEA Non-Gated Process for local authority permitted Projects	Acceptance of Gate 2 Variation Offer.	2 months from M4 or 12 months from M4 if pre-planning requirements are evidenced.	12 months from M1 completion	2 months from M4.	6 months from completion of M2
TEA Non-Gated Process for DCO or DNS Projects	Acceptance of Gate 2 Variation Offer.	14 months from M4.	12 months from M1 completion	2 months from M4.	6 months from completion of M2
No TEA required	N/A	2 months from offer acceptance.	12 months from M1 completion	2 months from offer acceptance	6 months from completion of M2

Table 2

- 7.3. It should be noted that Milestone M4 (Establish Transmission Interface) is a feature of the ENA Guidance but is not used as a Milestone for this purpose in Green GEN Cymru's Connection Queue Management. This is because we do not assign a queue position until after the TEA has been concluded, and where no such assessment is needed, there is no requirement to establish the Transmission interface.
- 7.4. However, if a TEA is needed, the dates for M1, M2, M3 and M6 are only determined after the TEA is concluded (meaning that the Customer's Connection Offer Agreement has been varied to reflect such assessment). To maintain consistency with the ENA Guidance in the sections that follow, references to successful completion of M4 means the valid acceptance of a variation to the Customer's Connection Offer Agreement to reflect the TEA.
- 7.5. If no TEA or other assessment is needed, the dates for M1, M2, M3 and M6 are determined from the date of a valid acceptance of Green GEN Cymru's offer to connect.
- 7.6. Furthermore, and in either case, any evidenced pre-planning requirements from the planning authority will be taken into account (see section 8.1). This means that additional time may be allowed to meet Milestones M1, M2 and M6, compared to situation for Projects where there are no evidenced pre-planning requirements.
- 7.7. It is important to note that any extension of time for pre-planning requirements does not extend the time to meet M3, and also the particular implications of not meeting the Pre-Construction Milestones, as detailed in Section 8.

8. Connection Milestones – detailed description.

8.1 Milestone 1 (M1) - Initiate Planning Consent

Key point: The Customer must begin the process of seeking statutory consents - including making a formal application for Planning Permission for the Project - within the timescales detailed below and be able to provide the required evidence. Planning approval may take considerable time, and in many cases the Customer may need to initiate early stages of the planning process prior to making its application to Green GEN Cymru, in order to meet its desired connection date.

Pre-Planning requirements

Planning Authorities may place pre-planning requirements on the Customer (i.e. work that must be completed prior to submitting the planning application). Examples include:

- An Environmental Impact Assessment (EIA) and/or non-EIA environmental or ecological studies.
- Specialist reports, such as Landscape and Visual Impact Assessments, Ecological Phase 1 Studies, and Traffic Impact Assessments.

Where these are needed prior to formal submission for consent, customers are expected to provide evidence as soon as possible, and certainly no later than the point from which M1 is measured (see table below). For clarity, the Customer is expected to present to Green GEN Cymru evidence that the Customer has received pre-planning requirements from the Planning Authority. Green GEN Cymru will then make reasonable adjustments to the Milestone date to incorporate pre-planning requirements (normally 12 months, but longer if appropriate). Where there are no pre-planning requirements prior to making a formal application for Planning Permission, M1 is set at 2 months after the relevant date from which it is measured (see table below).

Connection is subject to:	Measured from	Timescale	Evidence
No TEA required	Date of acceptance of Green GEN Cymru's connection offer	Where no additional Pre-Planning Requirements: 2 months. Where additional Pre-Planning Requirements evidenced: 12 months for local planning, 14 months for DCO/DNS or as agreed with Green GEN Cymru.	Planning Application reference number, viewable on LPA website. Customers may supply copies of planning approval documentation.
TEA Gated process	Date of the successful completion of M4		
TEA Non-Gated process	Date of the successful completion of M4		

8.2 Milestone 2 (M2) – Secure Planning Consent

Key point: The Customer must have secured statutory consents, including Planning Permission for the Project within the timescales detailed below and be able to provide the required evidence. The deadline for this Milestone is measured from the date of completion of M1. However, Customers may initiate the required processes in order to meet M1 before the Offer Acceptance Date, such that M2 may be completed earlier.

Connection is subject to:	Measured from	Timescale	Evidence
No TEA required	Completion of M1 milestone	12 months or 15 months if DCO or DNS.	Customer to confirm that planning consent has been secured with relevant planning notice reference. Approved Planning Notice viewable on LPA website.
TEA Gated process			
TEA Non-Gated process			

8.3 Milestone 3 (M3) – Secure Land Rights

Key point: The Customer must have secured the required Land Rights to enable the construction of the Project. For TEA Gated Projects following the Land Readiness Option for compliance with the Gate 2 Methodology, this Milestone will already have been met.

Connection is subject to:	Measured from	Timescale	Evidence
No TEA required	Date of acceptance of Green GEN Cymru's connection offer	2 months	Customer will provide documentation to demonstrate that, with respect to the land on which the Project is to be situated, it: • Is the owner or occupier of that land; or • Has entered into an agreement to lease the land; or • Has an option to purchase or to lease the land.
TEA Gated process	If not already secured, then date of successful completion of M4	N/A	This Milestone will be met when the Gated process is completed if following the Land Readiness Option. This is evidenced by acceptance of the revised connection offer issued following a successful Gate 2 offer from NESO. If the Planning Readiness Option is being followed, then the evidence requirements as per TEA Non-Gated process below apply.
TEA Non-Gated process	Date of the successful completion of M4	2 months	Customer will provide documentation to demonstrate that, with respect to the land on which the Project is to be situated, it: • Is the owner or occupier of that land; or • Has entered into an agreement to lease the land; or • Has an option to purchase or lease the land.

8.4 Milestone 4 (M4) – Establish Transmission Interface

Not used as part of Green GEN Cymru's Connection Queue Management, but this step is still necessary where required by the CUSC and provides the starting point for determining Milestone Dates where a TEA is required.

8.5 Milestone 5 (M5) – Submit Contestable Design (if applicable)

Milestones M5 and M6 are presented sequentially within this guidance document. However, it is understood that, in some cases of integrated and/or iterative design processes, the decision on which ICP to appoint to undertake the Contestable Design Works will not occur until a Construction Plan is in place. We would note, therefore, that the sequence in which these Milestones will be met may vary depending on the Project. The Milestone M5 date will be set at either 6 months after Milestone M2 (Secure Planning Consent) is met, or at a later date if that is agreed as part of the Milestone M6 (Agree Construction Plan). Please discuss with Green GEN Cymru when planning has been approved.

Key point: This Milestone will apply where a Customer has not accepted Green GEN Cymru's offer to carry out the contestable work in order to provide the connection. In such circumstances, the Customer will be required to provide evidence that the Customer's ICP has submitted a design for contestable works to Green GEN Cymru. Alternatively, and if applicable for the Project in question, the Customer's ICP is required to provide notification to Green GEN Cymru to confirm that it has self-approved its own design.

Connection is subject to:	Measured from	Timescale	Evidence
No TEA required	Date of completion of M2	6 months or later, if agreed with Green GEN Cymru and included in the M6 Construction Plan	Submitted contestable design submission (full design submission unless otherwise agreed with Green GEN Cymru). Where the Green GEN Cymru agrees to accept partial or phased design submissions (e.g. first submitted design) binding dates for submission of an approved design must be agreed as part of M6.
TEA Gated process			
TEA non-Gated process			

8.6 Milestone 6 (M6) – Agree Construction Plan

Key point: The Customer must agree the Construction Plan (and/or ICP programme of works) with Green GEN Cymru in a way that sufficiently demonstrates how the Customer will achieve the connection date. The required timescale for this Milestone is measured from Planning Permission being granted (M2) and demonstrates that the Customer is ready to proceed with the Project. The Customer is encouraged to engage with Green GEN Cymru early and ahead of the Milestone deadline in order to develop the Construction Plan. This will allow the connection to be integrated into Green GEN Cymru's wider construction programme.

The timing of the construction start date is important in demonstrating that the Project is progressing. In some cases, this date could occur a considerable time after the agreement of the Construction Plan (for example, the work may be contingent on the completion of network reinforcement) but otherwise, progress would be expected soon after the Construction Plan is agreed. If the proposed construction start date is more than 12 months after M6, then further explanation will be sought from the Customer and either additional evidence of Project progression sought or an explanation for the delay provided.

As a minimum, the Construction Plan should include dates for the completion of Milestone M7 (Project Commitment), Milestone M8 (Initiate Construction) and construction completion. Interim construction milestones may also be required by Green GEN Cymru depending on the nature, extent and duration of the Project works so that progress can be monitored. Where the Customer's site is being connected in phases (ie separate Projects), the Construction Plan should show what capacity is required and when. Where Green GEN Cymru agrees to accept a partial design submission, the dates for later submissions should be agreed as part of M6. The Construction Plan should include the following key information where applicable:

- Plant order placement dates.

- ICP appointment.
- Design submission dates (including protection and control schemes).
- Construction commencement and completion dates (including critical path construction items).
- Commissioning dates.
- G99 compliance statement submission.
- Details of any phased increases of capacity required (see Section 9.2).
- Any other relevant milestones specific to the Project.

8.7 Milestone 7 (M7) – Project Commitment

Key point: This Milestone demonstrates that the Project has the necessary commitment and/or backing for it to proceed. In order to meet the Milestone, the Customer must provide evidence as listed in the table below:

Connection is subject to:	Measured from	Timescale	Evidence
No TEA required	As agreed in the Construction Plan (at M6)	As agreed with Green GEN Cymru	Evidence where Green GEN Cymru is not completing contestable works: • Binding contract for the supply and installation of the main plant equipment including, for example, substations or generation equipment. Evidence where Green GEN Cymru is completing contestable works: • Full or staged payment made to Green GEN Cymru totalling at least 50% of the overall payment due to Green GEN Cymru. Alternatively, and where applicable, these are other acceptable forms of financial commitment: • the Customer has secured a suitable Government Contract such as CfD or CM; or • Board paper evidencing the Final Investment Decision (FID); or • Subsidy award.
TEA Gated process			
TEA non-Gated process			

Projects may vary with regard to when the Customer financially commits to the Project. This Milestone is intended to evidence that the Customer is fully committed to constructing the Project regardless of the delivery model (e.g. Green GEN Cymru full works or ICP build with Green GEN Cymru adopt).

Milestone M7 requires evidence of financial commitment by the Customer (where an ICP is building the connection), or that at least 50% of full contract price is paid (or has been secured in accordance with IDNO funded option for connection charges) (where Green GEN Cymru is completing all of the works).

- Where Green GEN Cymru is completing the contestable and non-contestable works: M7 is met where the Customer accepts Green GEN Cymru's connection offer to carry out both the contestable and the non-contestable work and pays the contract price in full on acceptance (or has secured it in accordance with IDNO funded option for connection charges).
- Where Green GEN Cymru is completing contestable and non-contestable works and a staged payment schedule agreed: Milestone M7 is the date on which the Customer has paid at least 50% of the contract price (or it has been secured in accordance with IDNO funded option for connection charges) in accordance with the agreed schedule of staged payments.
- Where Green GEN Cymru is completing non-contestable works only: M7 is met where the Customer accepts Green GEN Cymru's connection offer to carry out the non-contestable works only, pays the contract price in full on acceptance (or it has been secured in accordance with IDNO funded option for connection charges) and provides evidence of sufficient financial commitment to completing the contestable work (e.g. evidence the Customer has placed an order for the contestable connection assets (see table above)). This Milestone date would be 6 months after Milestone M5 (contestable design completed) is met or as reflected in the Construction Plan.

8.8 Milestone 8 (M8) – Initiate Construction

Key point: The Milestones associated with the Project Construction stage shall incorporate both the commencement of substantive works and the completion of all Customer works. M8 may, therefore, be a multistage Milestone and will be measured against both an agreed construction start and completion date taken from the Construction Plan. Other interim construction milestones may be agreed through the Construction Plan to demonstrate that the Project is progressing in line with the planned completion date.

Delays against the construction start, interim milestones or completion dates could lead to the Milestone not being met and termination of the agreement if the timescales set out in the Milestone Remedy Notice are exceeded. Green GEN Cymru will look to allow some flexibility in those timescales through the construction phase where this is reasonably possible. For example, if interim construction Milestones have been achieved and construction is progressing, but the construction completion date has been delayed, a variation may be requested by the Customer to extend the Milestone. Green GEN Cymru has discretion to decide whether to accept a proposed amendment.

Connection is subject to:	Measured from	Timescale	Evidence
No TEA required	Construction Plan (M6)	Commence construction in line with date agreed in the Construction Plan (Milestone M6); and Delivery and completion of the Customer works in accordance with the agreed Construction Plan, including any interim construction milestones and the completion date.	Commencement of substantive works at the Customer's Project site. Additionally, the Customer must maintain clear progress as per the construction plan agreed with the Network Company by achieving any additional interim target dates, up to and including the completion of all Customer works
TEA Gated process			
TEA non-Gated process			

Changes to Site Boundaries

Applications to connect to Green GEN Cymru's distribution network normally require the Customer to submit a plan whereby the site on which the connection to be made is defined, this is termed the Original Red Line Boundary (ORLB). The ORLB applied for should be consistent with the red line boundary used in the planning process (ie at M1 and M2), as well as at M5 (Submit Contestable Design), if relevant, and M6 (Agree Construction Plan). Changes to the ORLB at any point after the application is made may be allowable without impacting the application's status, but only where confirmed as allowable by Green GEN Cymru.. The ORLB should remain unchanged unless Green GEN Cymru has confirmed that any changes proposed by the Customer are allowable.

If the Customer submits a red line boundary directly to NESO as part of the TEA Gated Process (ie where the application is for a Large generator and therefore requires a BEGA), they must also provide a copy to Green GEN Cymru. This allows Green GEN Cymru to verify whether the boundary submitted to NESO matches the ORLB submitted with the Customer's application. Any discrepancies will be assessed to determine whether they constitute allowable or disallowable changes.

9. Non-Firm and Phased Capacity Connections

In recent years, there has been an emerging and increasing trend of connection offers allowing projects to connect to the distribution network on the basis of non-firm capacity or capacity that will be delivered in phases in line with agreed demand profiles. This section provides further context on the Connection Queue Management approach that will be taken in respect of those forms of connection.

9.1. Technical Limits or Curtailable Connections

Where projects are able to proceed in a timely and efficient manner based on agreed constraints while any necessary reinforcement work is undertaken, connection applications may be progressed on a non-firm basis. This will have the effect of allowing eligible projects to obtain an earlier connection date than would be possible if they had to await completion of the required reinforcement. Such constraints may include the following:

- **Technical Limits:** allowing new generation connections to be made on a non-firm basis prior to the completion of necessary reinforcement works and where a maximum allowable power flow through a GSP applies
- **Curtailable Connections:** allowing new generation connections to be made on a non-firm basis prior to the completion of necessary reinforcement works and where, under certain network conditions, the import and/or export capacity for a connection may be reduced to ensure that network power flows do not exceed network limits.

Where a Customer has accepted a connection offer on the basis of Technical Limits or a Curtailable Connection, the applicable Milestones will be calculated based on the earliest delivery date for the non-firm connection (i.e. the Offer Acceptance Date and/or connection date for the non-firm connection will be used as the basis for the applicable Milestones, irrespective of any future transition to a firm connection). Where further development is required in order for the project to progress on a firm/non-curtailable capacity basis, Green GEN Cymru may require separate Milestones to be set.

This approach ensures that, where Customers agree to progress on a non-firm basis, they remain subject to fair Milestones and such offers do not become a means by which capacity is blocked that would otherwise be available to more efficient and/or timely projects.

9.2. Phased Capacity Sites

Where the expected electricity usage of a Customer's development is forecast to grow over an extended period and, therefore, has a requirement for capacity to increase over time, Green GEN Cymru may make a connection offer on the basis of a Phased Capacity or staged delivery. This allows some developments (particularly larger developments) to connect to the distribution network and grow on a managed basis, with sufficient assurance that capacity will be available for anticipated future demand over an agreed period.

Where a Customer has applied for or accepted a connection offer based on a Phased Capacity, Green GEN Cymru will treat each phases as a separate Project for the purpose of Queue Management and will include Milestones to cover each Project phase. It would usually be expected that the Pre-Construction Milestones (M1, M2, M3 and M6) would be based on the timing of the first phase of works (i.e. the initial Project), but this could be varied if the development requires it. If a Customer does not meet its subsequent Milestones for the later Project phases, Green GEN Cymru reserves the right to vary the Connection Offer Agreement to reduce the total capacity of the site to align with the Project phases that have met their Milestones.

10. Delays within the Customer's Control/Milestone Remedy Notices

Where a delay to a Project has arisen through the actions (or inaction) of the Customer, Green GEN Cymru will allow the Customer some additional time to rectify the issue. This time is known as the Milestone Remedy Notice Period and will be for a period of 60 calendar days.

Milestone Remedy Notice Period Process:

- An accepted connection offer will be transitioned from "On Track" and classed as "Eligible for Termination" and, therefore, subject to the Milestone Remedy Notice Period, where at the applicable milestone date:
 - The Customer has not provided to Green GEN Cymru the required evidence that a Milestone has been met; or
 - The evidence provided is considered by Green GEN Cymru to be insufficient; and
- In either case, Green GEN Cymru has not agreed there is an exceptional issue affecting the progression of the Project (see Section 12).

If the above applies, then Green GEN Cymru will commence the termination process as follows:

- Green GEN Cymru will first issue to the Customer a Milestone Remedy Notice notifying the Customer that the Project is classed as "Eligible for Termination" and stating that the Customer must, within the Milestone Remedy Notice Period, either provide additional evidence that the Milestone has in fact been met or provide the required evidence to meet the missed Milestone.
- If the Milestone has not been met by the end of the Milestone Remedy Notice Period, then:
 - For the Pre-Construction Milestones (M1, M2, M3 and M6), Green GEN Cymru will give notice to the Customer terminating the agreement.
 - For the Construction Milestones (M5, M7 and M8), Green GEN Cymru will consider whether it is appropriate to terminate the agreement or may agree revised Milestone dates.

Please note - the Customer should notify Green GEN Cymru as soon as possible if the Customer experiences a delay outside of their control, ideally before receipt of a Milestone Remedy Notice. Where the Customer provides evidence that a milestone was not met due to events outside the Customer's control, Green GEN Cymru may, at its discretion, initiate a variation to the agreement and agree revised Milestone dates. In such circumstances, the full Milestone Remedy Notice Period would apply in the event that the Customer were to not meet the Milestone again.

11. Consequences of Connection Queue Management

- 11.1 The application of Connection Queue Management means that there may be consequences for slow-moving Projects. For Projects where the Milestone Remedy Notice Period has expired and the Customer has not provided the required evidence that a Milestone has been met, Green GEN Cymru may terminate the agreement.
- 11.2 Customers would lose their place in any queue and may incur cancellation charges and/or securities charges where applicable. The Customer will need to make a new connection application, if the Customer wishes to do so. Such applications will be assessed based on the network conditions at the time of the new application and not on those that prevailed at the time of the previous application (i.e. new applications will be assessed based on updated network capacity conditions, including any updated reinforcement requirements). Additional costs in the form of reinforcement costs and/or increased securities and liabilities might then apply. If the Customer accepts the connection offer associated with a new application, the Customer will either a) join the queue based on the new connection offer (where no TEA is required) or b) receive an indicative Gate 1 offer pending later progression through Gate 2 or other Transmission assessment where required. In neither case will the Customer retain its original queue position.
- 11.3 As a result of network capacity being made available, other connections may be able to progress more quickly and may cease to be dependent on reinforcement work. Overall, the impact of Connection Queue Management will be that Projects that are able to adhere to Milestones will be prioritised, leading to less unnecessary congestion in the connections queue and to reduced lead times/connection

dates for Projects that are ready to progress. This provides a further incentive on Projects to meet their Milestones and ensures more effective use of available capacity.

12. Issues outside a Customer's control

- 12.1 The Connection Queue Management process recognises that there may be a small number of exceptional issues that Customers cannot control and which may lead to Project delays. Delays occurring because of such issues may not trigger a Milestone Remedy Notice, provided that the Customer engages with Green GEN Cymru and, acting in good faith, is able to evidence the issue. Examples of such exceptional issues include, but are not limited to:
- Force Majeure: Force Majeure is a provision in a contract that excuses a party in circumstances where performing its contractual obligations becomes impossible or impracticable due to an event or effect that the parties could not have anticipated or controlled;
 - Planning decisions delayed by planning authorities: Where a Customer has made a planning application (i.e. Milestone M1 is met) but the planning authority has not made a decision.
 - Planning appeals and third-party challenges: Where a planning decision by the planning authority is challenged through a formal appeal process by the Customer or a third party to that decision.
 - Where a relevant authority places an obligation on the Project, which could cause the Milestone/Remedy Notice Period timescales to be exceeded and change the Project status e.g. unanticipated Requirements of the planning authority during the consenting process or post-consent.
 - Any delay which is caused by Green GEN Cymru (e.g. the Customer/ICP is awaiting a required input from Green GEN Cymru).
- 12.2 Where a Project experiences delays due to reason outside of a Customer's reasonable control, the Customer must:
- Discuss the specifics of the delay with Green GEN Cymru at the earliest opportunity; and
 - Provide reasonable evidence to justify the specific delay.
- 12.3 Where the Customer provides evidence that the Milestone was not met due to events outside its control, Green GEN Cymru can, at its discretion, issue a variation to the Milestone date(s). In such circumstances, the full Milestone Remedy Notice Period of 60 calendar days would apply in the event that the Customer were to not meet the milestone again.

13. Challenge process

- 13.1 Customers that wish to challenge Green GEN Cymru's decision to terminate an agreement and to release connection capacity can do so under Green GEN Cymru's complaints procedure. This would require the following steps to be taken.
- Initial challenge with Green GEN Cymru: Highlighting justifiable reasons for review of the decision.
 - Escalation: Green GEN Cymru would undertake a review.
 - Further escalation in line with Green GEN Cymru's existing procedures.
- 13.2 Ofgem has the power to determine the outcomes of disputes between Electricity Distributors and Customers (both commercial and domestic) in certain circumstances. More information on Ofgem's determination powers, and how to refer a determination to Ofgem, can be found in Ofgem's guidance on its website.

14. Communication associated with Connection Queue Management

- 14.1 Green GEN Cymru’s communications to Customers regarding the Connection Queue Management process will include the information below.
- Queue Management will apply in connection offers;
 - Offers will contain information on each Milestone, including required timescales and evidence;
 - There will be a brief explanation of Project status categories; and
 - Link to further information on Green GEN Cymru or ENA websites.
- 14.2 Milestone Remedy Notice, if triggered
- Notification of a change in Project status to “Eligible for Termination”; and
 - Notification of termination of the Connection Offer Agreement, where applicable.
- 14.3 Green GEN Cymru may also develop further monitoring and communications over time. Customers are responsible for ensuring that they progress Projects against the Milestones and providing evidence that Milestones have been met. Green GEN Cymru will monitor Milestones for all Projects in a connection queue. Where a Project does not meet a Milestone, Green GEN Cymru will inform the Customer so that the Customer is aware that the Milestone Remedy Notice Period process has been triggered.

15. Definitions

Term	Definition
Connection Milestones or Milestones	Specific target deliverables to evidence progress of a Project’s construction
Contestable Design Works	The design works for the Contestable Element of the extension asset required for a Customer to connect to the electrical network, where not undertaken by Green GEN Cymru. The Competition in Connections process allows for an ICP to prepare and approve (either via Green GEN Cymru or self-certified, where applicable) the design for the works, ahead of them being installed and subsequently adopted by Green GEN Cymru.
Customer	A person who has applied to Green GEN Cymru for the provision of a new connection or a modification to an existing connection to Green GEN Cymru’s distribution network.
DNO	Distribution Network Operator
EIA	Environmental Impact Assessment
ENA Guidance	ENA’s Queue Management User Guide version 6.0 of September 2025
Gate 1	Projects that fall within the scope of the Gate 2 Criteria Methodology but who do not to meet the Gate 2 Readiness and/or Gate 2 Strategic Alignment Criteria are considered to be in Gate 1. They will be issued a Gate 1 offer which if validly accepted will result in a Gate 1 Connection Offer Agreement and entitle the Customer to apply for Gate 2 in respect of that Project. A Gate 1 offer will include an indicative connection date and indicative Point of Connection but the Project will not be assigned a queue position.
Gate 2	Projects that fall within the scope of the Gate 2 Criteria Methodology and who meet the Gate 2 Readiness and Gate 2 Strategic Alignment Criteria are considered to be in Gate 2. They will be issued a Gate 2 Variation Offer which if validly accepted will

	convert their Gate 1 Connection Offer Agreement into a Gate 2 Connection Offer Agreement. A Gate 2 Variation Offer will confirm a target connection date and Point of Connection, and the Project will be assigned a queue position based on the time of acceptance of that offer.
Gate 2 Criteria Methodology	The methodology prepared by NESO and approved by Ofgem for use in the reformed connections processes from 2025.
Gate 2 Readiness Criteria	As set out in the Gate 2 Criteria Methodology from time to time, the Customer must meet the requirements of either the Land Readiness Option or Planning Readiness Option.
Gate 2 Strategic Alignment Criteria	As set out in the Gate 2 Criteria Methodology from time to time, the Customer's Project must align with NESO's requirements in terms of technology type and location, or benefit from some other form of specified criteria in that Methodology, such as having a "relevant protection" or being "designated".
Gate 2 Variation Offer	A variation to a Customer's Connection Offer Agreement reflecting the outcome of the TEA Gated Process or TEA Non-Gated Process
ICP	Independent Connections Provider.
IDNO	Independent Distribution Network Operator.
Land Readiness Option	The option for achieving the Gate 2 Readiness Criteria by demonstrating that the Customer owns or leases (or has secured the rights to lease or own) sufficient acreage of land to form the site on which the Project is planned to be located.
MW	Megawatt.
Milestone Remedy Notice	The notice issued when a Milestone has passed its Milestone date and the Customer has not provided the required evidence that the Milestone has been met.
Milestone Remedy Notice Period	60 calendar days.
NESO	National Energy System Operator.
Offer Acceptance Date	The later of the date on which the Customer validly accepts Green GEN Cymru's connection offer or, if a TEA is required (Gated or Non-Gated), the date on which the Customer validly accepts the Gate 2 Variation Offer.
Offered Connection Date	The connection date offered by Green GEN Cymru in the offer made to the Customer (or the Gate 2 Variation Offer following any TEA (if applicable)).
Ofgem	Office of Gas and Electricity Markets.
Planning Readiness Option	The option for achieving the Gate 2 Readiness Criteria by demonstrating that the Customer has submitted a valid application for DCO planning consent (or an alternative planning process which they need to follow in order to be granted Compulsory Purchase Order powers to secure sufficient land rights for the Project).
Pre-Construction Milestones	Specific Milestones that must be completed before the actual construction work can begin on a connection, namely Milestone M1 (Initiate Planning Consent), Milestone M2 (Secure Planning Consent), Milestone M3 (Secure Land Rights) and Milestone M6 (Agree Construction Plan).
Project	This refers to a Customer's generation or demand project or, where the project has separate phases or different technologies, any one part of the overall project. This means for example that where a Customer is seeking to connect two different technologies at one connection site (such as a battery and a solar array), each

	technology will be regarded as a separate Project for the purposes of this guidance and may therefore have different Milestones which will be assessed separately for compliance.
TEA	Transmission Evaluation Application or, where the context requires, NESO's assessment via a TEA Non-Gated Process
TEA Gated Process	NESO's process for connections that require a TEA, including Gate 2 requirements.
TEA Non-Gated Process	NESO's process for connections that require evaluation for possible impacts on the Transmission System but are not within the scope of the Gate 2 Criteria Methodology.

16. Associated Documents

[ENA - Open Networks Project Queue Management User Guide](#)

17. Contact Information

17.1. Please contact the Customer Connections Manager for further information regarding this policy.

18. Document Control

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