



Green Generation Energy Networks Cymru Limited (company number 13060815)

Compliance report

1. Introduction

This report is for the reporting year (being the period from 5 July 2024 to 31 March 2025), as required by Standard Licence Condition 31C of the Green Generation Energy Networks Cymru Limited (**Green GEN Cymru**) electricity distribution licence (**Licence**).

This report summarises the licensee's compliance with the Relevant Requirements (as defined in the Licence) and provides an update on the implementation of the practices, procedures and systems adopted in accordance with the Compliance Statement which is published on the Green GEN Cymru website.

The Compliance Officer has undertaken the following tasks in connection with the preparation of this report: audits, advice, meetings, monitoring work, cooperation with key stakeholders and training oversight. The resources and access provided to the Compliance Officer to fulfil their duties included access to senior management, relevant members of staff, equipment, audit questionnaires and responses and relevant systems to perform the role.

2. Compliance with relevant requirements

2.1 Review work

Green GEN Cymru has demonstrated compliance with licence condition 31B through the business separation review work undertaken by the Compliance Officer, and the Windward Energy group compliance function during the period from 5 July 2024 to 31 March 2025. The Compliance Officer is independent of the operations of Green GEN Cymru and reports into the Windward Energy group management team.

The Compliance Officer has undertaken an annual review of the business separation requirements for the reporting year (being the period from 5 July 2024 to 31 March 2025). The results of the review are as follows:

- There were no breaches of the Relevant Requirements.
- A small number of opportunities were identified to strengthen controls. These are in the process of being implemented.

This review work has identified that the practices, procedures and systems in Green GEN Cymru supporting the statement of compliance are being fully implemented as the business continues to develop, mature and grow.

2.2 Managerial and operational independence

Green GEN Cymru is part of the Windward Energy group of companies (**Windward Energy group**). During the reporting year Green GEN Cymru was owned by:

- (i) Bute Energy Development Holdings Limited (**BEDHL**), a wholly owned subsidiary of Bute Energy Limited and part of the Windward Energy group; and
- (ii) CI V Dragon Holdco Ltd (**Dragon Holdco**), a holding company ultimately owned by Copenhagen Infrastructure Partners.

Green GEN Cymru's status as a separate legal entity in the Windward Energy group provides an appropriate structure for separation. The Green GEN Cymru board currently comprises of 5 directors who are sufficiently independent from any Relevant Undertakings.

System procedures and structures have been implemented and continue to operate to ensure that the key objectives of business separation have been met.

During the reporting period, no companies within the Windward Energy group held an electricity generation licence nor were any of the activities carried out by the Windward Energy group licence exempt (as contemplated by the Licence).

2.3 Systems and confidential information

Green GEN Cymru has continued to operate IT systems as required to operate as an Independent Distribution Network Operator (**IDNO**). Access to these IT systems was reviewed as part of the annual business separation compliance audit. Business separation and the requirement to restrict access to confidential information were considered and continues to be reviewed by the business as the business grows.

Arrangements are in place between Green GEN Cymru and other companies in the Windward Energy group for central services functions such as human resources, finance and in-house legal services.

2.4 Branding

Green GEN Cymru maintains a separate branding identity from Relevant Undertakings. This is reinforced in the marketplace through the branding of Green GEN Cymru information on its website and social media. Clear branding is used during everyday operations to clearly identify Green GEN Cymru equipment, facilities, property, staff (for example, uniforms, signage and identity cards) and communications.

2.5 Staff transfers

Transfers of Green GEN Cymru staff to or from Relevant Undertakings are overseen by appropriate managerial and subject matter experts with associated risk assessment. During the year 2024-2025 there was one staff transfer from Green GEN Cymru to Bute Energy Limited. Appropriate steps were taken to ensure no issues arose with the transfer.

3. Breach reporting and complaints

Breach reports or complaints received will be advised to the Compliance Officer who will work with the Green GEN Cymru compliance team to ensure appropriate investigation work is undertaken. The Compliance Officer will review details of the response to the complaint and any remedial action taken or proposed.

There have been no items considered to be reported breaches or complaints during 2024/25.

4. Staff training

Business separation training is provided to all Green GEN Cymru staff and to those in other Windward Energy group roles whose work brings them into contact with Green GEN Cymru and Green GEN Cymru's activities. Completion of business separation training is mandatory for all members of staff in Green GEN Cymru and the Windward Energy group who have been specifically identified. Training is expected to be completed by all Green GEN Cymru and Bute Energy staff annually. Green GEN Cymru monitors completion statistics and those results are shared with the management team of Green GEN Cymru. This ensures that training is completed, and appropriate action taken where training has not been undertaken within the required timescales. Completion rates of the training for Green GEN Cymru staff are above the internal target rates set by Green GEN Cymru.

5. Contact

Queries relating to this report should be made and addressed to:

Compliance Officer

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