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Reformed National Pricing: reforms to siting and investment levers

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About Uniper

Düsseldorf-based Uniper is a European energy company with global reach. With around 7,000 employees, the company plays a central role in ensuring a secure energy supply in Europe – particularly in its core markets of Germany, the United Kingdom, Sweden, and the Netherlands. With 18.5 gigawatts of power generation capacity, Uniper is the backbone of reliable electricity production. As a leading gas trader and one of Northwestern Europe’s most important LNG importers, Uniper strengthens supply security with a broad procurement portfolio. Through investments in renewable energy, hydrogen, and other low-carbon energy carriers, Uniper is also driving the transformation of the energy system.

In its home market, Germany, Uniper supplies around 1,000 municipalities and industrial companies with energy and services. In addition, Uniper is Germany’s largest operator of gas storage facilities and hydropower plants.

About Uniper in the UK

In the UK, Uniper owns and operates a flexible generation portfolio of six power stations, a fast-cycle gas storage facility, two high pressure gas pipelines, and significant regasification capacity at the Grain LNG terminal in Kent. We’re also progressing CCS and hydrogen projects and expanding our onshore wind and solar portfolio, to further support energy security in the UK.

Consultation response:

We have set out below our answers to the consultation questions. Our views in summary:

- Locational signal provided by the charging regime needs to be maintained. It functions as both a siting tool for long-term investments and an ongoing operational cost.
- Solely Option 3 provides the most suitable balance between the connections regime and locational charges and should be pursued further.



- In implementing both the RNP framework and Option 3, DESNZ should further work on: clear transitional arrangements; robust governance, transparency and accountability, as well as aligning the SSEP updates with the revisions of the charging frameworks.

Our views in full:

Q 1a) Do you agree with the key levers that we have identified for supporting the delivery of the SSEP? Please provide rationale and evidence for your answers.

We agree that the key levers outlined are appropriate and align well with the objectives of the SSEP.

Q 1b) Do you think there are any other levers missing or alternatives that should be considered? If so, please list them and provide rationale and evidence for your suggestion.

We agree that the overall framework seems comprehensive. Nonetheless, to further enhance its efficacy, several additional mechanisms will be required, including:

- Clearly defined transitional arrangements to safeguard ongoing projects and sustain investor confidence;
- This might be achieved through a mechanism to cap or fix locational charges at a time which is consistent with activities such as taking a project's Final Investment Decision (FID) or applying for a support mechanism, thereby ensuring investment certainty; and
- Robust governance, accountability, and transparency, particularly given the expanded role of central planning and the involvement of multiple bodies (NESO, Ofgem, and DESNZ) responsible for different elements of the RNP.

Q 2) Do you agree with how we have categorised the levers? Specifically

- a) in your view, should Network Build, Seabed Leasing and Planning Reform be categorised as enabling levers; and***
- b) in your view should the Connections Regime, Locational Charging and Generation and Storage Investment Support Mechanisms be categorised as primary levers?***

We support the proposed categorisation of levers. Network Build, Seabed Leasing, and Planning Reform are correctly identified as enabling levers, since they create the essential infrastructure and regulatory framework needed to deliver projects and expand the system. We also agree that these aspects will consistently play a supporting role, no matter how other levers are combined.

Likewise, we share the view that classifying the Connections Regime, Locational Charging, and Generation and Storage Investment Support Mechanisms as primary levers is justified. These mechanisms have a direct impact on project economics, investment choices and market signals.

Q 3) What are your views on the overall strategic approach we have used for combining the levers into an options framework? For example, the logic and structure underpinning the options including the grid for how to combine the primary levers (Table 1).



The RNP Delivery Plan and the wider strategic approach set out in this consultation do not clearly explain the intended outcome or the reason for change following DESNZ's decision to implement the RNP in July 2025¹. We recognise the value of grouping the different levers into options based on how the connections regime interacts with locational charging. However, without a clearly defined objective, it is difficult to assess the available options effectively.

Q 4) To what extent do you agree or disagree with the criteria we have used to assess the options? Please provide rationale and evidence to support your answer with reference to any other criteria that could be included in the assessment.

We agree with the criteria used to assess various options.

Q 5) Do you agree with our preference for Options 2a, 2b, and 3 being suitable for further development with Options 0, 1 and 4 being discounted? Are there aspects of Options that you either think work particularly well, or that we should consider further? Please provide comments and further evidence to support your answer.

We agree with the suggestion of discounting Options 0, 1 and 4.

In our view, solely the options that provide the most suitable balance between the connections regime and locational charges should be pursued further.

With that in mind out of the preferred Options 2a, 2b and 3, we consider that solely Option 3 is suitable for further development.

Options 2a and 2b rely predominantly on connection, as the main selection mechanism, to the detriment of the role of transmission charging.

Overlooking these costs, particularly when combined with government investment support mechanisms such as Contracts for Difference (CfD) or the Capacity Market (CM), may result in selecting suboptimal projects. Locational charges are crucial for the CfD and CM because they provide essential price signals that reflect the true cost of delivering electricity to specific, often congested, areas.

Option 3 provides the most suitable integration of market and connection signals and maintains the role of transmission charging in reflecting the true system costs. Specifically in the context of CM and CfD, Option 3 maintains competition while allowing price signals to determine which projects should proceed. This, in turn, aligns build decisions with congestion and network constraints.

Q 6) How do you think the risks and disadvantages identified under Options 2a, 2b and 3 could be addressed?

The disadvantages of Options 2a and 2b have been highlighted in our response to the previous questions. While we recognise that Option 3 also presents some risks- such as: volatility, uncertainty and dependence on modelling assumptions. However, there are various ways in which they can be addressed.

In particular:

- Robust governance and transparency will help maintaining confidence in the regime and is necessary to effectively manage concerns about subjectivity;
- Implementing mechanisms that fix or stabilise charges will help mitigate long-term uncertainty; and

¹ [Review of electricity market arrangements \(REMA\): Summer update, 2025 - GOV.UK](#)



- Aligning the SSEP updates with the revisions of the charging frameworks, so that assumptions made in both are consistent, will allow for continued adaptability.

Q 7a) Do you think it would be practical to set Connections Capacity Thresholds for Options 2a, 2b and 3, by SSEP technology and zone?

Reiterating our preference for Option 3, we agree that it would be practical to set Connections Capacity Thresholds by SSEP technology and zone. Such approach should provide a clear and actionable signals to the market and therefore result in a better alignment between project development and the SSEP, while enhancing transparency regarding available capacity.

In addition, the CCT should be set at a higher level to the CSNP planning line to allow for project attrition and competition in investment support schemes.

Q 7b) How should these thresholds be determined? Please provide rationale to support your answer.

In our view, at least the following factors should be considered when determining threshold levels:

- The overarching SSEP pathway,
- Demand forecast,
- Project attrition rates, as well as
- The need to maintain robust competition.

These elements should be incorporated not only in the methodology for establishing Connection Capacity Thresholds, but also in the broader process of zone formation.

Q 8a) Should we set the CCT at a level higher relative to the CSNP planning line to allow for project attrition and competition in investment support schemes

Yes, we agree with setting the CCT at a higher level to the CSNP planning line (see our response to Q7a- above). Without this headroom, there is a risk of making the central planning the primary determinant for selection, reducing the role of competition.

Q 8b) If we set the CCT above the SSEP Pathway, what additional safeguards might be needed to ensure we keep within the SSEP Pathway uncertainty range?

Possible measures could include milestone compliance and/or financial commitments that limit speculative applications, as well as continuous monitoring of effects on constraint costs and system operation.

Q 9) What are your views on the role of locational charging, and interactions with our investment support schemes?

As mentioned in our response to Q5, locational charges are vital for investment mechanisms like CfD and CM because they give price signals that show the real cost of supplying electricity to specific, often congested areas. This means that the economic optimising of projects under these mechanisms can take into account all relevant factors including the impact on system costs.

Q 10) For Options 2a, 2b and 3, what, if any, changes or reforms would be needed to government investment support mechanisms (such as the Contracts for Difference, Capacity Market etc), and if so, what specific reforms would be needed?



In terms of specific reforms to government investment support mechanisms- at the minimum, fixed locational charges and connection offers should be timed to allow participants to take them into account in their CM and CfD bids. In addition, capacity volume targets in the CM auction and CfD allocation rounds should adequately align with SSEP assumptions.