

**Workgroup Consultation Response Proforma****CMP328: Connections Triggering Distribution Impact Assessment**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com) by **5pm** on 12 March 2021. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation, please contact Rob Pears [Rob.Pears@nationalgrideso.com](mailto:Rob.Pears@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com)

Respondent details	Please enter your details
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**For reference the Applicable CUSC (non-charging) Objectives are:**

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;*
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*; and*
- Promoting efficiency in the implementation and administration of the CUSC arrangements.*

*\*Objective (c) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).*

**Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.**

<b>Standard Workgroup Consultation questions</b>		
1	Do you believe that the CMP328 Original Proposal better facilitates the Applicable Objectives?	Yes
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
<b>Modification Specific Workgroup Consultation questions</b>		
5	For DNO respondents, please describe your process and timescales associated with current Third Party Works applications	We have received several notifications for TPW applications at a number of our GSPs. We welcome the proposed modification allowing this process to be clarified and therefore moved forward.
6	For Third Party Works users, please describe your experience of using the Third Party Works process, specifically awareness of and timescales associated with the process; are there any defects in the TPW process that the DIA process does not address?	N/A
7	Annex 6 provides a summary of the WG's view of the pros/cons of both the Third Party Works and proposed Distribution Impact Assessment process.	N/A
7a	Do you agree with this?	Yes
7b	Do you have any additional pros or cons you wish to add?	No
8	Applicability - Do you agree with the applicability criteria proposed? Please provide your rationale.	Yes – all major points covered and in alignment with SOW process with the 1MW threshold.
9	Contractual milestones - Do you foresee a better way of updating contractual milestones to reflect	No – BCA seems like a logical place to locate this information.

	the result of a Distribution Impact Assessment?	
10	Fees and Costs - Do you agree with the Proposal that any costs as a result of the DIA should be passed from the DNO to the Transmission applicant via the ESO?	Yes, agree with this methodology.
11	Clean Energy Package (CEP) - Currently CUSC Section 4 documents the payments that will be made by the ESO for Mandatory Services with the site-specific details captured in the Bilateral Connection Agreement. In your view, how/where should any compensational arrangements be documented for DNOs curtailing Transmission connected generators.	After completion of DIA, the outcome could be that a managed connection can be proposed. These agreements should be contractually agreed between the DNO and the applicant at this stage with the ESO facilitating. Work on the recently developed Regional Development plans could be utilised here to help with this process.
12	Which of the following do you believe should be included when assessing options/impacts under the proposed DIA process;	N/A
12a	impact upon distribution connected generators/storage with transmission export capacity (TEC)	No
12b	impact upon distribution connected generators/storage without transmission export capacity (TEC)	Yes
13	Should the DIA process be triggered upon receipt, or acceptance of an application from the transmission customer and please provide your reasoning.	Suggest an acknowledged acceptance is provided to allow for a managed clock start type arrangement, where data is validated first by the DNO before the DIA process commences.