

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 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 or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Neil Bennett
Company name:	SSEN Transmission
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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.

Standard Workgroup Consultation questions		
1	Do you believe that the CMP328 Original Proposal better facilitates the Applicable Objectives?	Neutral to all. Potentially positive or negative to d) depending on whether this is applied to <u>any</u> application made for connection ie SOW/BELLA/BEGA/BCA arbitrarily or whether its selectively applied. It has the potential to delay connection dates. However, if selectively applied this could streamline and formalise the process effectively
2	Do you support the proposed implementation approach?	Currently, no, as don't believe any impact assessment has been completed on the TO
3	Do you have any other comments?	From a whole system perspective, this could resolve the issues when for example a TO requests the DNO to investigate options to resolve a transmission constraint. There is also the potential where the TO and DNO solutions may require collaboration to provide an overall efficient solution and therefore potentially requiring to form a collaborative approach earlier on in the Transmission connection application process. The time frames for the studies required in the connection process for a TO is already limited and the impact on this will need to be considered if this becomes an enduring approach.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
Modification Specific Workgroup Consultation questions		
5	For DNO respondents, please describe your process and timescales associated with current Third Party Works applications	N/A

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.	
7a	Do you agree with this?	Mostly. Where it mentions ECCR regulations, this is not a regulation that Transmission is party to and therefore would require more than a DCUSA change.
7b	Do you have any additional pros or cons you wish to add?	<p>Cons for DIA- Additional time constraints for when an application for connection is concluded. ie if Transmission application process= 7 months to conclude but is subject to DIA, DIA application submitted in month 8 with period required for competency checks (approx. 7 calendar days). Additional 30 calendar days for invoicing/Payment of fees. Conclusion of DIA approx. 90 calendar days. At the end of which there may be more additional days for acceptance of offer, restudying of T works etc but if there wasn't, this would mean an additional 127 calendar days would need to be added to Transmission works conclusion as customer would not wish TO to commence works until DIA concluded thus delaying connection date by this length.</p> <p>Cons for DIA- Additional cost for customer. Where previously customer only needed to pay the DNO directly for TPW, this would require input of ESO and therefore any additional costs incurred by them in the connection process</p>

		Cons for DIA- This has not been assessed as a queue milestone within the Queue Management open network product that this is needing to be achieved to proceed with connection
8	Applicability - Do you agree with the applicability criteria proposed? Please provide your rationale.	No, this should be a selective process- similar to levels of SOW where minimum requirement thresholds need to be met or similar.
9	Contractual milestones - Do you foresee a better way of updating contractual milestones to reflect the result of a Distribution Impact Assessment?	No
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?	Acting reasonably in the DNOs capacity, agree any appropriate costs are passed through.
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.	No comment
12	Which of the following do you believe should be included when assessing options/impacts under the proposed DIA process;	
12a	impact upon distribution connected generators/storage with transmission export capacity (TEC)	Yes
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.	Similar to SOW, it should not be mandatory to commence DIA upon receipt as the final solution of the transmission works may not be suitable to the end customer therefore would add cost to something they would ultimately not require. It should be made optional but a mandatory milestone within their contract to ensure DIA is commenced and concluded on acceptance of their transmission offer
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