

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:	Graham Campbell
Company name:	SP Energy Networks
Email address:	Graham.Campbell@spenergynetworks.co.uk
Phone number:	Click or tap here to enter text.

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?	Yes, we believe the proposal better facilitates Applicable Objectives (a), (b) and (d) as detailed within the Consultation document.
2	Do you support the proposed implementation approach?	Whilst we consider an early implementation date would be best and would be supportive of any actions to speed up the implementation, we accept the proposed date of 12 months from decision.
3	Do you have any other comments?	<p>We consider a process mirroring the SoW / PP process is the most appropriate way to facilitate transmission connections that impact on the Distribution system. For clarity, this process should only apply to transmission applications that could impact on the distribution system.</p> <p>We would expect that the once a DIA is triggered, the assessment would only be undertaken once the application is declared competent (i.e. the correct information has been received) and payment has been made.</p> <p>Any enduring contractual terms resulting from works or operational solutions identified would be between the ESO-DNO and reflected in the contract between the ESO-Transmission customers.</p> <p>Any consequential new, or updates to, STC processes to apply to the TO should be progressed with implementation timescales aligned.</p>
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	Current process attached.
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?	Yes, however we note that the issue of CAF/ECCR is listed as a con for both TPW and DIA and is out of scope of this change. This would require a legislative change.
7b	Do you have any additional pros or cons you wish to add?	Further advantages for the DIA include: <ul style="list-style-type: none"> timescales for the process, whereas the current TPW process does not have defined timescales.
8	Applicability - Do you agree with the applicability criteria proposed? Please provide your rationale.	Yes, we agree with the applicability criteria proposed in that demand and generation projects with more than 1MW of import/export capacity which may have an impact on the distribution network (>£10,000 of works on the distribution network). This provides for a consistent approach that will be transparent to applicants.
9	Contractual milestones - Do you foresee a better way of updating contractual milestones to reflect the result of a Distribution Impact Assessment?	Contractual milestones should be reflected in the Construction Agreement.

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, we agree that any costs should be via the ESO. This mirrors the current process for Distribution connections.
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.	Compensational arrangements should be documented in the Bilateral Connection Agreements as this is the enduring contract.
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)	Included
12b	impact upon distribution connected generators/storage without transmission export capacity (TEC)	Included
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 the SoW / PP process and should be triggered once in receipt of acceptance, noting that the DIA will only commence once the necessary information and payment from the ESO has been received.