

Code Administrator 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 18 October 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Paul Mullen paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Joanna Knight
Company name:	SSEN
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I wish my response to be:

(Please mark the relevant box)

☒ Non-Confidential☐ Confidential

Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

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 in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions		
1	Do you believe that the CMP328 Original Proposal or WACM1 or WACM2 better facilitates the Applicable Objectives?	Whilst we acknowledge that all three options are preferable to the current arrangements, we believe that the Original Proposal better facilitates the Applicable Objectives than either of the alternatives.
2	Do you support the proposed implementation approach?	In general, we support the proposed implementation approach. Timescales for this approach have been agreed based upon feedback received during the working group meetings. However, our view is that from a DNO or customer perspective, a timely implementation is essential for the value of this Modification to be realised.
3	Do you have any other comments?	Overall, we believe that the Original proposal better facilitates the objectives than the two alternatives. WACM1 is an update of the Third-Party Works process which does not address or resolve the issues which have already arisen due to the ESO offering tertiary windings connections over the past two years. A key issue with both versions of the TPW process is that there is no codification of the ESO's responsibilities or involvement in that process and therefore we suggest this is not wholly in line with the 'whole system approach.' Whilst WACM2 is similar to the Original proposal, a significant difference concerns the document received by the ESO from the DNO detailing the works required. Under WACM2, the DNOs will be mandated to provide a report to the ESO which will not be contractually binding and therefore cannot be formally accepted. The ESO would then issue an updated BCA (a process which could take up to 90 days) to cover this contractual shortfall. This approach will mean that the documents initially issued to the ESO will be significantly different to all other customer formal offers issued by DNOs and will make the administration of processes like interactivity and queue management problematic for all customers involved. The Original proposal will provide the ESO with a standard connection offer in line with those received by all other customers which can be accepted under the same universal terms.

		<p>The Original proposal seeks to promote collaborative working between the ESO, the transmission customers and the DNO by providing an initial definition of relevant transmission connections subject to the DIA process with a provision that that definition can be adjusted as appropriate. This provision will be at the DNO's discretion based on the current status of the distribution network but the reasoning of the DNO will be fully transparent to the ESO and the relevant transmission customer(s). The Original proposal will ensure that the ESO, the transmission customer(s) and the DNO work together throughout the connection process with the basis of a contractual offer to ensure all rights are protected. It will also ensure via contractual recognition between the ESO and the DNO that any enduring network requirements are met.</p>
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