

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:	Deborah MacPherson
Company name:	SP Transmission plc
Email address:	Deborah.macpherson@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?	We consider proposed date of 12 months from decision to be reasonable whilst taking account of any wider STC changes that will be required as a consequence.
3	Do you have any other comments?	<p>We agree that a process mirroring the SoW / PP process is the most appropriate way to facilitate transmission connections that are clearly identified as having or likely to have an impact on the Distribution system.</p> <p>The DIA process needs to take account of the TO role in the assessment and where any additional TO works may be required.</p> <p>In absence of TO input, the working group must take into consideration the impact on the STC and whether or not a new STCP is required to support the modification. Implementation timescales must therefore be aligned and take account of such changes.</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	N/A
6	For Third Party Works users, please describe your experience of using the Third Party Works	N/A

	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?	
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
7b	Do you have any additional pros or cons you wish to add?	We recognise the benefit of having a clearly defined process with governing timescales as set out for the current SoW Process.
8	Applicability - Do you agree with the applicability criteria proposed? Please provide your rationale.	<p>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).</p> <p>This provides for a consistent approach that will be transparent to applicants.</p>
9	Contractual milestones - Do you foresee a better way of updating contractual milestones to reflect the result of a Distribution Impact Assessment?	Any impact on programme or works, linked with Contractual milestones should be included within the relevant construction agreements.
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?	We agree that any costs should be via the ESO, the process should also take account of any additional TO costs.
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	No comment

	arrangements be documented for DNOs curtailing Transmission connected generators.	
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.	Aligning with the current arrangements for the SoW / PP process, the DIA should be triggered once in receipt of acceptance.