

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:	Gerry Boyd
Company name:	SP Energy Networks
Email address:	Gerard.boyd@spenergynetworks.co.uk
Phone number:	Click or tap here to enter text.

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?	<p>We believe that the Original Proposal better facilitates Applicable Objectives A, B & D as it provides a fair, consistent and transparent approach to assessing and managing the impact on the Distribution network of customers connecting to the Transmission network.</p> <p>Whilst WACM1 is a slight improvement on the current process, it does not address the main issues that have arisen when Distribution network assessments are required for connections to the Transmission network and therefore does not provide sufficient improvement to better facilitate the Applicable Objectives.</p> <p>WACM2 better facilitates applicable objectives A, B & D compared to the current Third-Party Works process and WACM1, however the data requirements reduce efficiency compared to the Original Proposal.</p> <p>We consider that all options are neutral for Objective C.</p>
2	Do you support the proposed implementation approach?	Yes, although we would be supportive if the timescale to implement the DIA process could be shortened.
3	Do you have any other comments?	<p>We consider the Original Proposal to be the best solution as it provides a clear process and ensures appropriate ownership and contractual relationship with the appropriate parties. The proposed process largely mirrors the well-established Statement of Works process used for generators connecting to the distribution network that might impact on the Transmission system, thereby providing consistency and fairness. In addition, we believe the Original Proposal will simplify the process for transmission connecting customers, removing confusion and unnecessary delays. The process will be transparent and easily understood by all parties whilst supporting collaboration and aiding whole system design.</p> <p>WACM1 continues to use the third party works process which is intended for low volume, one off works with no ongoing requirements and not for the type and volume of transmission applications as a result of, for example, connections to tertiary windings. The Third-Party work process, in our experience to date, has introduced delays in obtaining the necessary technical information and is confusing for customers who want to only deal with the</p>

	<p>party they are connecting to. With regards to the DNO costs involved in assessing any impact on the distribution network, these also need to be recovered from the appropriate party in a consistent and transparent manner and this is not the case when utilising the Third-Party Works process. WACM1, which offers a slightly enhanced Third Party Works process, does not address this issue. In addition, WACM1 still requires transmission connecting customers to contract with the DNO and therefore does not efficiently cater for any enduring requirements.</p> <p>WACM2 is a better solution than the baseline and WACM1, however the requirement to provide such regular, detailed information in addition to existing obligations places a significant burden on the DNO. The Original Proposal has been refined to allow a threshold to be agreed and will help to address the issue of unnecessary DIA applications being made. In addition, we consider a formal Contract following a DIA is more appropriate than the Report suggested under WACM2.</p>
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