

Code Administrator Consultation

CM078: Connections Triggering Distribution Impact Assessment

The proposal seeks to make changes to the System Operator Transmission Owner Code to reflect CUSC modification CMP328 relating to Transmission connections that trigger an impact assessment on the Distribution network.

Modification process & timetable



Have 5 minutes? Read our [Executive summary](#)

Have 20 minutes? Read the full [Code Administrator Consultation](#)

Have 30 minutes? Read the full Code Administrator Consultation and Annexes.

Status summary: We are now consulting on this proposed change.

This modification is expected to have a: Medium impact on ESO and Transmission Owners

Governance route Standard Governance modification to proceed to Code Administrator Consultation

Who can I talk to about the change?	Proposer: David Halford, National Grid ESO David.Halford@nationalgrideso.com 07812 774065	Code Administrator Contact: Sally Musaka Sally.Musaka@nationalgrideso.com 07814 045448

How do I respond? Send your response proforma to stcteam@nationalgrideso.com by **5pm on 29 April 2022.**

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Executive summary

This modification seeks to make changes to the System Operator Transmission Owner Code to reflect CUSC modification [CMP328](#) relating to Transmission connections that trigger an impact assessment on the Distribution network.

What is the issue?

Currently within the CUSC there is no mechanism or specific process covering arrangements for Transmission connections that could have an impact on the Distribution system. Impacts are primarily direct physical impacts including but not limited to Fault Level rating, Thermal rating, Voltage control, Power Quality, Control and Protection systems. Impacts are also commercial where explicit Transmission access rights that the Distribution system owner or embedded Users may have is impacted, and where commercially sensitive data, is held only by the ESO and the relevant CUSC Users and only publicly available in part. Without this modification there is not an appropriate process in place as a means of a Transmission User facilitating connections that trigger Distribution impact assessments that covers both physical impacts and explicit Transmission access rights impacts.

What is the solution and when will it come into effect?

Proposer's solution:

In the Proposer's view changes will be required to STC Schedules 5 & 6 to ensure the TO is aware if a Distribution Impact Assessment will be required and where in the connection process this will be actioned.

Implementation date: Ten working days following Authority Decision on CMP328 and PM0120.

What is the impact if this change is made?

This change will create an efficient process for connections to the Transmission system that require a distribution impact assessment, create opportunities for generation to connect at both Transmission and Distribution and also create an efficient process for connections to the Transmission system that require distribution impact assessment.

Interactions

- | | | | |
|--|---|--|-------------------------------|
| <input type="checkbox"/> Grid Code | <input type="checkbox"/> BSC | <input checked="" type="checkbox"/> CUSC | <input type="checkbox"/> SQSS |
| <input type="checkbox"/> European
Network Codes | <input type="checkbox"/> Other
modifications | <input type="checkbox"/> Other | |

This modification is required as a follow-on from CUSC modification [CMP328](#).

What is the issue?

Currently within the CUSC there is no mechanism or specific process covering arrangements for Transmission connections that could have an impact on the Distribution system. Impacts are primarily direct physical impacts including but not limited to Fault Level rating, Thermal rating, Voltage control, Power Quality, Control and Protection systems. Impacts are also commercial where explicit Transmission access rights that the Distribution system owner or embedded Users may have is impacted, and where commercially sensitive data, is held only by the ESO and the relevant CUSC Users and only publicly available in part. Without this modification there is not an appropriate process in place as a means of a Transmission User facilitating connections that trigger Distribution impact assessments that covers both physical impacts and explicit Transmission access rights impacts.

CUSC modification CMP328 aims to address this issue with the introduction of a “Distribution Impact Assessment” (DIA) process, which will establish a transparent process with clear and defined timescales for all parties involved.

As a result of the CUSC modification, it has been identified that changes will be required to the STC to enable and facilitate the changes within CMP328.

The Final Modification report for CMP328 is now with the Authority awaiting a decision, but it has been confirmed by the Authority that the associated STC/STCP changes will also need to be presented in order for a final decision to be made and implemented.

Why change?

In the Proposer’s view as part of the proposed CMP328 CUSC modification, it has been identified that changes will be required to Schedule 5 and Schedule 6 of the STC to enable and facilitate the changes within CMP328.

Changes are required to the NGESO Connection Application which is submitted to TOs to support DNO impact assessments.

The NGESO Connection Application will be amended in order to:

- Inform the TO if a Distribution Impact Assessment will be completed by the relevant DNO(s)
- If the Distribution Impact Assessment will be completed by the relevant DNO(s) during the TO Construction Offer process or once the TO Construction Offer has been completed and signed by all parties.

The CUSC modification also contains alternative solutions (WACM1 & WACM2) which have been presented to the Authority and will need to be reflected in the STC/STCP changes (if required).

WACM1 - Enhancement of the current Third Party Works (TPW) process.

WACM2 - An applicability criteria is used rather than the original Proposal blanket 1MVA threshold as to establish if a DIA is required.

What is the solution?

Proposer's solution

Original Proposal and WACM2

Changes will be required to STC Schedules 5 & 6 to ensure the TO is aware if a Distribution Impact Assessment will be required and where in the connection process this will be actioned.

WACM1

No changes are required to the core STC. This WACM will impact STCP18-6 only. Modification PM0120 has been raised at the same time as this modification which details the STCP changes required to reflect this change.

Legal text

The legal text for this change can be found in Annex 2.

What is the impact of this change?

Proposer's assessment against STC Objectives

Relevant Objective	Identified impact
(a) efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act	Positive Creates an efficient process for connections to the Transmission system that require a distribution impact assessment
(b) development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission	Neutral
(c) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity	Positive Creates opportunities for generation to connect at both Transmission and Distribution
(d) protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees	Neutral
(e) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC	Positive Creates an efficient process for connections to the Transmission system that require a distribution impact assessment

(f) facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;	Positive Provides a clear and documented process for generation to connect to the Transmission system
(g) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.	Neutral

Proposer's assessment against the Applicable Objectives

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories

Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Neutral
Lower bills than would otherwise be the case	Neutral
Benefits for society as a whole	Neutral
Reduced environmental damage	Neutral
Improved quality of service	Neutral

When will this change take place?

Implementation date

Implementation timelines in line with CUSC modification CMP328 and STCP modification PM0120.

CMP328 solutions	STC changes required	STCP changes required
Original Proposal and WACM2	STC Schedules 5 & 6 via CM078	STCP18-1 and STCP18-6 via PM0120
WACM1	No STC change required	STCP18-6 via PM0120

It is recommended by the Code Administrator that the STC Panel give advance approval to implement the corresponding STCP changes to facilitate the CMP328 solution decided by the Authority. The expectation is that the Authority will issue decisions for CMP328 and CM078 on the same day. This will enable an efficient implementation of all three modifications 10 working days following the Authority decision.

Date decision required by

If the proposed governance route is accepted by Panel, the Final Modification Report for CM078 will be submitted to the Authority on 6 June 2022. The decision is required as soon as possible to enable CMP328 - if this is not implemented by November 2022, the benefits of this would be reduced.

Implementation approach

No systems or processes will need to be amended as a result of this proposal.

Interactions

- | | | | |
|--|---|--|-------------------------------|
| <input type="checkbox"/> Grid Code | <input type="checkbox"/> BSC | <input checked="" type="checkbox"/> CUSC | <input type="checkbox"/> SQSS |
| <input type="checkbox"/> European
Network Codes | <input type="checkbox"/> Other
modifications | <input type="checkbox"/> Other | |

This modification is required as a follow-on from CUSC modification CMP328.

How to respond**Code Administrator consultation questions**

- Do you believe that CM078 Original proposal, WACM 1 or WACM2 better facilitates the Applicable Objectives?
- Do you support the proposed implementation approach?
- Do you have any other comments?

Views are invited on the proposals outlined in this consultation, which should be received by 5pm on **29 April 2022**. Please send your response to stcteam@nationalgrideso.com using the response pro-forma which can be found on the [modification page](#).

If you wish to submit a confidential response, mark the relevant box on your consultation proforma. Confidential responses 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.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CM	Code Modification
CUSC	Connection and Use of System Code
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
DIA	Distribution Impact Assessment
DNO	Distribution Network Operator
ESO	Electricity System Operator
TO	Transmission Owner
TOCO	Transmission Owner Connection Offer
NGESO	National Grid Electricity System Operator

Reference material

- [CMP328 - Connections Triggering Distribution Impact Assessment](#)

Annexes

Annex	Information
Annex 1	Proposal form
Annex 2	Legal text