

Code Administrator Consultation Response Proforma**CM078: 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 stcteam@nationalgrideso.com by **5pm on 29 April 2022**. 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 Sally Musaka Sally.Musaka@nationalgrideso.com or stcteam@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Matthew Paige-Stimson
Company name:	National Grid Electricity Transmission plc
Email address:	matthew.paige-stimson@nationalgrid.com
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 STC Objectives are:

- efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act
- development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission
- facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity
- 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
- promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.
- facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;
- compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.

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 Original Proposal and WACM1/WACM2 better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/>A</td> <td><input checked="" type="checkbox"/>B</td> <td><input checked="" type="checkbox"/>C</td> <td><input checked="" type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> <td><input checked="" type="checkbox"/>F</td> <td><input type="checkbox"/>G</td> </tr> <tr> <td>WACM1</td> <td><input type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> <td><input type="checkbox"/>F</td> <td><input type="checkbox"/>G</td> </tr> <tr> <td>WACM2</td> <td><input checked="" type="checkbox"/>A</td> <td><input checked="" type="checkbox"/>B</td> <td><input checked="" type="checkbox"/>C</td> <td><input checked="" type="checkbox"/>D</td> <td><input checked="" type="checkbox"/>E</td> <td><input checked="" type="checkbox"/>F</td> <td><input type="checkbox"/>G</td> </tr> </table>	Original	<input type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input type="checkbox"/> E	<input checked="" type="checkbox"/> F	<input type="checkbox"/> G	WACM1	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input type="checkbox"/> G	WACM2	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input checked="" type="checkbox"/> E	<input checked="" type="checkbox"/> F	<input type="checkbox"/> G
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		<p>Our response below relates to the combination of CMP328 and this modification and PM120, given that the impact of this proposal accrues from the entirety of the change rather than the changes to schedule 5 and schedule 6 set out in isolation in CM078.</p> <p>We believe WACM2 better meets the applicable objectives overall. WACM2 is based on GSP specific threshold criteria and so referrals to the DNO will be selective, meaning customer's projects are not delayed due to a DIA referral without objective reasons. This aligns with the proposed approach for CMP298. The WACM2 approach will be more proportionate and administratively efficient, limiting referrals only to those transmission connections' effects likely to have an impact on a distribution system. Given the increases in transmission connection application volume it is most important that additional administration burden is added only where absolutely necessary.</p> <p>We do not believe the Original proposal better meets the applicable objectives overall. The Original is better than baseline in respect of objectives B,C,D and F. However, most importantly, under the Original proposal, ALL transmission connections will be referred (as all are over 1MW) and therefore the original is negative in respect of applicable objectives A and E. The Original proposal is administratively inefficient, given the resource demands that the referral of every single transmission connection will create, without due cause for many applications to be referred. Unnecessary referrals are likely to impact on the Timely Connections incentive. Although DNOs have promised to waive the referral for impact assessment when appropriate, this assurance is without the protection of codification and the exact basis of the waiving of need for a distribution impact referral has not been expressly set out.</p> <p>We do not believe WACM1 better meets the applicable objectives overall. WACM1 is essentially the Third Party Works baseline with some relatively minor clarification of timings around interactions between DNO and User and acknowledgement that further variation of the TO offer may result. Otherwise the process remains unchanged from the baseline as far as the TO is concerned. In respect of WACM1 there is no specific arrangements for how the ESO obtains specific information necessary to assist the User in achieving a Third Party Works impact assessment from a third party.</p>																								

Standard Code Administrator Consultation questions		
2	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>10 working days is insufficient time for resourcing changes, training, communications and final preparation in readiness to receive and handle applications on the revised processes.</p> <p>We suggest a longer implementation period following approval of CMP328/CM078/PM120 is needed. Implementation is just short of the CMP328 implementation 12 months after Authority decision would seem more appropriate.</p>
3	Do you have any other comments?	<p>Yes.</p> <p>In respect of the specific legal text changes accompanying this CM078 mod, the legal drafting added to Schedule 6 needs to refer to a Connection Modification Application as shown, extracted, below.</p> <p>“A NGESO Connection <u>Modification</u> Application submitted by NGESO to a Transmission Owner pursuant to Section D, Part Two, sub-paragraphs 2.2.1, 2.2.2, 2.2.3, 2.2.4 and 2.2.5 shall contain the following information:</p> <ul style="list-style-type: none"> • Whether a Distribution Impact Assessment (DIA) will be completed by the relevant Distribution Network Operator(s). • Where a DIA is required, whether this will be completed by the DNO(s) during the TO Construction Offer or once TO Construction Offer has been signed. “