

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 19 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:	Joanna Knight
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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 agree it better facilitates the applicable objectives as further set out within the consultation report.
2	Do you support the proposed implementation approach?	We agree with the approach; however the suggested timescales are too long for effective implementation. There are numerous active Transmission connection offers already accepted which are currently utilising the Third Party Works process which we do not believe is appropriate.
3	Do you have any other comments?	No
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	On receipt of the NGESO connection technical information, we engage with the Transmission customer to provide a feasibility study in the first instance to identify whether Distribution works are required. We aim to issue these studies within a 65 working day period. If works are identified we engage with the customer and provide a connection offer as appropriate. Conversations between SEPD, the customer and NGESO occur as necessary.
6	For Third Party Works users, please describe your experience of using the Third Party Works 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?	N/A
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?	<p>We believe the following points are considered cons under the Third Party Works.</p> <ul style="list-style-type: none"> • Does not address how NGESO will handle transmission connections which impact on GSP headroom (with reference to Appendix G/Transmission Impact Assessment) • Does not address the conflict between a right to TEC access and a non-build constraint solution proposed by a DSO to a transmission customer which could prioritise their own customers without TEC access
8	Applicability - Do you agree with the applicability criteria proposed? Please provide your rationale.	Yes
9	Contractual milestones - Do you foresee a better way of updating contractual milestones to reflect the result of a Distribution Impact Assessment?	The contractual interface between DNO & NGESO is via the relevant BCA. We believe this is the most appropriate means to reflect any enduring Distribution requirements. Implications of Distribution works on Transmission offer milestones should be managed by NGESO as appropriate.
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 will pass any costs to NGESO. This will then be for NGESO to determine how they pass these on. This aligns with the current SOW process.
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.	Any costs or payments would be passed to NGESO as our customer. This will then be for NGESO to determine how they pass these on.

	In your view, how/where should any compensational 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;	We believe any connection (within the eligibility criteria) that could potentially impact the Distribution network, should be studied under the proposed DIA process. This would ensure a fair and consistent approach.
12a	impact upon distribution connected generators/storage with transmission export capacity (TEC)	See comment above.
12b	impact upon distribution connected generators/storage without transmission export capacity (TEC)	See comment above.
13	Should the DIA process be triggered upon receipt, or acceptance of an application from the transmission customer and please provide your reasoning.	In line with the current SOW process, this would be at NGESO and their customers discretion. Applications could be made prior to or post Transmission acceptance. We would commence the DIA process on receipt of a competent application.