

Code Administrator Consultation Response Proforma**CMP376: Inclusion of Queue Management process within the CUSC**

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 4 May 2023**. 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:	Damian Jackman
Company name:	Field
Email address:	damian@field.energy
Phone number:	07840839319

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.*

**The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.*

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 CMP376 Original proposal and/or WACMs 1-11 inclusive better facilitate the Applicable Objectives?	Mark the Objectives which you believe each solution better facilitates:		
		Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM1	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM2	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
		WACM3	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
		WACM4	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
		WACM5	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
		WACM6	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
		WACM7	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
		WACM8	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
		WACM9	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
		WACM10	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
		WACM11	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	
		Click or tap here to enter text.		
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
		The modification should apply to all existing offers (as per WACM7).		
3	Do you have any other comments?	<p>Some of the proposals in several WACMs (3/4, 5/6, 11) appear eminently sensible and the Authority should consider whether they need to be incorporated into the Original, with the remaining decision for the Authority being simply whether this should be retrospective.</p> <p>We strongly believe whichever WACM is chosen, that only the WACMs that apply this modification retrospectively should be considered, since to only apply this change for new applications will mean the connection queue remains clogged with projects that are unlikely to progress, leading to higher costs for consumers and delays to viable projects which risk missing net zero targets.</p>		

	<p>WACM1/2; this is a minor benefit but is better than the original as requiring the ESO to agree the construction plan is subjective and risks differences in treatment between users</p> <p>WACM3/4: This is strong benefit; without the need for earlier land agreements, the many users who currently hold offers with connection dates in the 2030s have little incentive to pursue land agreements. These WACMs would flush out those projects which have little chance of progressing due to lack of land agreements.</p> <p>WACM5/6: This is a strong benefit which may suit both the developer and allow the TO to operate more efficiently by agreeing timescales and resource commitment across multiple connections in a more coherent manner.</p> <p>WACM8/9: We are supportive of dynamic queue management but the process of reallocating capacity for projects that have missed milestones is likely to be complex (especially accounting for distribution queues) and will need a separate modification to work through fully</p> <p>WACM11: It seems entirely sensible to include a limited exception for projects that require obtaining CfDs and this should be included in the Original's list of exceptions.</p> <p>WACM10: The purpose of this alternative was not defined clearly enough to fully understand.</p>
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