

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:	Helen Stack
Company name:	Centrica
Email address:	helen.stack@centrica.com
Phone number:	07979 567785

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 checked="" type="checkbox"/> D
		WACM3	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM4	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM5	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D
		WACM6	<input type="checkbox"/> A	<input 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 checked="" 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 type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D
<p>The Original and WACMs 1-4 and WACM7 all better facilitate ACOs (a), (b) and (d).</p> <p>The lack of queue management at transmission level is frustrating the ability of shovel-ready projects to connect due to the number of speculative and stalled projects ahead of them in the queue.</p> <p>The current regime limits the Licensee from providing Users with an efficient connections service and the consequent delays in connecting new flexible and low-carbon generation is hampering competition.</p> <p>This long delays projects face connecting to the British electricity networks is a major barrier to achieving net zero. The current situation with the queue is exacerbating these delays and inflating the quantity and cost of works for new applicants. There is consensus on the need to cut connection times.</p> <p>Since the workgroup vote we have discussed the WACMs further internally and reduced the number we believe better facilitate the Objectives.</p> <p>WACM1/2 – This is a reasonable change.</p> <p>WACM3/4 - We believe that tightening the requirements on projects to evidence land-rights at an earlier stage would improve</p>						

		<p>on the Original proposal by closing a major defect with the current regime that has enabled speculative projects to enter and remain in the queue. It would also help level the playing field for projects connecting to the distribution system that have a transmission impact. Those distributed generation projects must evidence land rights to the DNO at an early stage but can find themselves sat in the transmission queue behind transmission projects with no land rights.</p> <p>WACM7 - Without WACM7, CMP376 will have limited impact in the short and medium term because most stalled projects in the queue will be excluded, creating a two-tier regime, and increasing the disincentives for existing stalled or speculative projects to exit the queue. We do not normally support retrospective changes – by exception, in this case we believe there is a compelling need. WACM7 also aligns with the agreement reached by DNOs in the ENA Strategic Connections Group to migrate connection offers made prior to 2017 to queue milestones or remove them from the queue.</p> <p>WACM8, WACM9 - We believe that the ESO still needs a right to terminate, otherwise projects that are reassigned within the queue could permanently sit there.</p> <p>WACM5, WACM6, WACM10 and WACM11- We believe that these add in too many grey areas and/or complexity to the process.</p>
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
3	Do you have any other comments?	We are keen to see effective queue management implemented as soon as possible.