

Code Administrator Consultation Response Proforma

CMP330: Allowing new Transmission Connected parties to build Connection Assets greater than 2km in length & CMP374: Extending contestability for Transmission Connections

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 29 June 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 Milly Lewis Milly.Lewis@nationalgrideso.com or cusc.team@nationalgrideso.com

| Respondent details | Please enter your details | |
|--|--|--|
| Respondent name: | Deborah MacPherson | |
| Company name: | ScottishPower Renewables | |
| Email address: | Deborah.macpherson@scottishpower.com | |
| Phone number: | 07734 281373 | |
| Which best describes your organisation? | <input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body | <input type="checkbox"/> Interconnector <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other |

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 (charging) Objectives are:

- That compliance with the use of system charging methodology facilitates effective competition in the generation and supply of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity;*
- That compliance with the use of system charging methodology results in charges which reflect, as far as is reasonably practicable, the costs (excluding any payments between transmission licensees which are made under and accordance with the STC) incurred by transmission licensees in their transmission businesses and which are compatible with standard licence condition C26 requirements of a connect and manage connection);*

- c. *That, so far as is consistent with sub-paragraphs (a) and (b), the use of system charging methodology, as far as is reasonably practicable, properly takes account of the developments in transmission licensees' transmission businesses;*
- d. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- e. *Promoting efficiency in the implementation and administration of the system charging methodology.*

***The Electricity Regulation referred to in objective (d) 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 | Please provide your assessment for the proposed solution(s) against the Applicable Objectives? | <p>Mark the Objectives which you believe the proposed solution(s) better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input checked="" type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> <tr> <td>WACM1</td> <td><input checked="" type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input checked="" type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> </table> <p>In considering the applicable objectives, they are assessed as follow:</p> <p>Against Objective A - it could be considered as increasing competition by allowing more parties to construct connection assets</p> <p>Against Objective C - it potentially increases the efficiency of building new networks.</p> <p>If implemented correctly, this modification could deliver efficient and economic construction of a small number of specific infrastructure assets for sole use purposes.</p> | Original | <input checked="" type="checkbox"/> A | <input type="checkbox"/> B | <input checked="" type="checkbox"/> C | <input type="checkbox"/> D | <input type="checkbox"/> E | WACM1 | <input checked="" type="checkbox"/> A | <input type="checkbox"/> B | <input checked="" type="checkbox"/> C | <input type="checkbox"/> D | <input type="checkbox"/> E |
| Original | <input checked="" type="checkbox"/> A | <input type="checkbox"/> B | <input checked="" type="checkbox"/> C | <input type="checkbox"/> D | <input type="checkbox"/> E | | | | | | | | | |
| WACM1 | <input checked="" type="checkbox"/> A | <input type="checkbox"/> B | <input checked="" type="checkbox"/> C | <input type="checkbox"/> D | <input type="checkbox"/> E | | | | | | | | | |
| 2 | Do you have a preferred proposed solution? | <p><input type="checkbox"/>Original <input checked="" type="checkbox"/>WACM1 <input type="checkbox"/>No preference</p> <p>We welcome the improved choice for customers in contestability of connection assets and the promotion of competition in network development to deliver more cost-effective solutions, leading to benefiting end consumers. Any decision however, will require careful consideration of the solution the modification delivers for the self-build choice for single users assets and the balance/risk to the end consumer for the longer-term development of the network for connecting future system users.</p> | | | | | | | | | | | | |

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| | | We assess WACM 1 as the preferred solution rather than original proposal given the implications to NGESO and the TOs and changes required to facilitate the implementation - namely: <ul style="list-style-type: none">• Securing additional resources• Amending Connection Application processes ensuring additional training is provided across all relevant departments• Adjustments to the Connections Portal |
| 3 | Do you support the proposed implementation approach? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text. |
| 4 | Do you have any other comments? | No |