

Workgroup Consultation Response Proforma**CM079: Consideration of STC/STCP changes in relation to CMP330/374**

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 08 AUGUST 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 Elana.Byrne@nationalgrideso.com or stcteam@nationalgrideso.com

Respondent details		Please enter your details	
Respondent name:	Lynne Bryceland		
Company name:	SP Transmission		
Email address:	lbryceland@spenergynetworks.co.uk		
Phone number:			
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input checked="" 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 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.

- f) *facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
- g) *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 Workgroup Consultation questions		
1	Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?	<p>Mark the Objectives which you believe the Original Solution better facilitates:</p> <p>Original <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</p> <p>We are supportive of the proposer's solution which we believe effectively identifies changes required to the STC to align with the CUSC modification proposals CMP330 and CMP374.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>We agree that the implementation approach for CM079 needs to be in line with the approach set out in the associated CUSC modification proposals.</p> <p>In relation to the proposed CUSC modifications, given the wider regulatory challenges for implementing the modifications, we believe that an extended implementation timeline is likely to be required.</p> <p>The CUSC proposals will not only enable the TOs and ESO to establish revised ways of working internally, but it will be important for us to work with Ofgem to clarify the outstanding matters in relation to licence compliance and the introduction of this new contestability process into the Price Control framework. We do not believe it would be appropriate to introduce the CUSC modifications, and in turn these proposed STC modifications without the consequential changes to the RIIO framework being fully considered and implemented, ensuring protections are in place for consumers and TOs.</p>
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p>

	Consultation Alternative Request for the Workgroup to consider?	Click or tap here to enter text.
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Specific Workgroup Consultation questions

5	Having reviewed the proposed CM079 solution and legal text, are there any significant matters arising which you feel may have a bearing on the associated CUSC modification proposal (CMP330/374/414)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.
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