

Code Administrator Consultation Response Proforma**CMP427: Update to the Transmission Connection Application Process for Onshore Applicants**

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 16 February 2024**. 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 catia.gomes@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Anthony Cotton	
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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 type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input checked="" type="checkbox"/> Other

I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (*this will be shared with industry and the Panel for further consideration*)

☐ **Confidential** (*this will be disclosed to the Authority in full but, unless specified, will not be shared with the Panel or the industry for further consideration*)

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	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 <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> <tr> <td>WACM1</td> <td><input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> <tr> <td>WACM2</td> <td><input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> <tr> <td>WACM3</td> <td><input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> </table> <p>Click or tap here to enter text.</p>	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
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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									
2	Do you have a preferred proposed solution?	<p> <input type="checkbox"/>Original <input type="checkbox"/>WACM1 <input type="checkbox"/>WACM2 <input checked="" type="checkbox"/>WACM3 <input type="checkbox"/>Baseline <input type="checkbox"/>No preference </p> <p>Click or tap here to enter text.</p>								
3	Do you support the proposed implementation approach?	<p> <input checked="" type="checkbox"/>Yes <input type="checkbox"/>No </p> <p>Click or tap here to enter text.</p>								
4	Do you have any other comments?	<p>Can ESO be asked to advise how long it expects to take to validate the LOA/land ownership position and the effect this may have on projects reaching “clock start”</p> <p>On a point of clarification, on page 8 of the Consultation it is stated “<i>It was confirmed (by the Proposer) that the proposed CMP427 solution would only apply to Users and/or to the ESO CUSC Schedule 1 parties</i>”. Many applicants will not be party to the CUSC at the time of application therefore they will not be Users, nor bound by the CUSC. But it is assumed that it is intended that the requirement will apply to them also.</p>								

	<p>On page 12 of the Consultation it is stated that “<i>BEGA/BELLA application are out of scope of CMP427 and are, instead, governed by the LoA obligations with the respective DNO</i>”. Can ESO confirm that new DNO/IDNO connection applications will also be out of scope, as these will be driven by either embedded generation or demand applications on their networks, which are also subject to the network owner’s LoA requirements.</p> <p>Following on from the foregoing comment, the legal text is incorrect as drafted because it requires all Users to submit at least one Letter of authority. The legal text for the Original and each WACM needs to be changed as follows:</p> <p>At 2.13.1 “... (including <u>in the case of Users applying for a connection in the category of a Power Station directly connected to the GB Transmission System or for a Non-Embedded Customer Site</u> in respect of the provision ...”</p> <p>At 2.13.2 “The Users <u>applying in categories that require Letters of Authority</u> shall ensure ...”</p>
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