

Workgroup 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 26 January 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
catia.gomes@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details	
Respondent name:	Dan Thomas	
Company name:	Banks Renewables Limited (Kype Muir / Middle Muir)	
Email address:	Dan.thomas@banksgroup.co.uk	
Phone number:	07720348078	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network 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"/> System Operator <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 (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 Workgroup Consultation questions				
1	Do you believe that the Original Proposal better facilitate the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> </table> <p>We are supportive of the Landowner Authority principle and agree with the significant majority of the proposal.</p> <p>We disagree with the minimum acreage requirement which must be demonstrated at the point of application, which as proposed is an unduly onerous barrier to non-speculative applications, risking effective competition and potentially slowing progress to national decarbonisation targets. We have therefore not marked Objectives A & B, and instead support an alternative for consideration.</p>	Original	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
Original	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D			
2	Do you support the proposed implementation approach?	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>We are supportive of the Landowner Authority principle and agree with the significant majority of the proposal. We disagree with the minimum acreage requirement and support an alternative for consideration.</p>		
3	Do you have any other comments?	We encourage the ESO wherever practicable to align with the DNO's process.		
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>We support the 'Reasonable Minimum Acreage' WACM proposed by Bay Wa.(Graham Pannell) as an improvement on the original.</p>		

Specific Workgroup Consultation questions		
5	Do you believe that the proposed LoA meets the objectives set out by Ofgem and DESNZ in CAP? If not, please provide your rationale.	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>Close, see alternative proposal by Bay Wa. We are supportive of the Landowner Authority principle and agree with the significant majority of the proposal. We disagree with the minimum acreage requirement and propose an alternative for consideration.</p>

6	Do you believe that an LoA should have a validity period? If so, please provide a timescale and your rationale.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Agree with Original proposal.
7	Do you agree, in principle, with the concept of an Energy Land Density table? If not, please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
8	Do you agree with format and the categories proposed in the Energy Land Density table? If not, please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
9	Do you have different values that you can provide for the Energy Land Density table? If so, please provide your rationale.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Not at this stage
10	Do you believe that the LoA should be in the form of a standard template? If not, please provide your rationale.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No We agree the ESO could propose a template, but that it must not be mandated.
11	Do you believe the use of the word “authorise” within the LoA, could have adverse legal consequences? If so, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No No comment
12	Do believe the proposed LoA template is suitable for all jurisdictions (England & Wales, and Scotland)? If not, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No No comment
13	Do you believe that the technology type should be	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	included in the LoA template? If you not, please provide your rationale.	Users are required to evidence real engagement with Landowners. A generic 'energy park' or similar response is sufficient for this purpose, otherwise the LoA risks restricting optimisation at early stage of future development and use of new technologies. Technology type will continue to be included in the application to allow ESO / TO to assess.
14	Do you consider the exemption approach to deal with exceptional circumstances appropriate? If not please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No
		No comment.