

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:	Alex Ikonic	
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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 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** (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?	Mark the Objectives which you believe the proposed solution(s) 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
		Click or tap here to enter text.
2	Do you have a preferred proposed solution?	<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>While we strongly support the idea of a sense check between capacity being applied for and land for the project, we have a strong preference for WACM 2 or 3, which we believe strike an appropriate balance between raising the barrier of entry to reduce the number of speculative projects, and the realities and challenges of project development, particularly for projects of a large scale.</p> <p>Our concern is that applying the energy density table values in full (as is proposed in the Original and WACM 1) could distort competition and that larger projects, which are viable, may be disadvantaged as it may not be feasible to secure LOAs from all relevant landowners within the timeframes required for application. This is particularly a risk under the gated / windowed application process proposed under Connections Reform where the time to submit an application is limited to 1-2 months.</p> <p>While we acknowledge the ESO's point that these values are not strict cut offs and further discussions with the developer would follow, we are not clear on the process / escalation if the two parties disagree – again, considering</p>

		<p>the new process under Connections Reform, failure to reach an agreement, or even have these discussions with ESO (who will be busy processing many applications during these 1-2 months), would result in the developer missing out on the window and having to wait another 12 months before being able to apply again.</p> <p>We would be open to a value other than 50% being applied but we believe it important to apply a multiplier to the energy density table.</p>
3	Do you support the proposed implementation approach?	<div><input checked="" type="checkbox"/> Yes</div> <div><input type="checkbox"/> No</div> <p>We support the modification being implemented as soon as possible and take on board the ESO's point that 10 business days allows time to publish the guidance document and train up internally on the process.</p>
4	Do you have any other comments?	<p>Click or tap here to enter text.</p>