

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:	Gareth Williams	
Company name:	SP Transmission Ltd	
Email address:	Gareth.williams@spenergynetworks.co.uk	
Phone number:	N/A	
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 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 checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> </table> <p>a) Positive - We believe that this modification will allow the ESO to manage the queue more efficiently, and reduce the volume of speculative applications.</p> <p>b) Positive - We believe that the modification will allow fairer and more efficient access for new generation projects connecting to the NETS.</p> <p>c) Neutral</p> <p>d) Positive – This will certainly improve efficiency in the implementation and administration of the CUSC arrangements by reducing speculative applications, and in conjunction with CMP376 will ensure earlier engagement with landowners.</p>	Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D			
2	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>		
3	Do you have any other comments?	<p>We recognise that there is a misalignment between arrangements with Distribution, and agree that a consistent process would be desirable. We understand that Distribution stakeholders are looking at strengthening the scope of the LoA, and we believe that the effectiveness of this Transmission modification (if approved) is kept under review to ensure it delivers on its objective, and where it falls short, further strengthening the scope, in line with any suitable changes to the distribution process, should be considered too.</p> <p>It is important that the connecting customer provides a LoA for the whole land they have authority for, directly related to the project they are seeking a transmission connection for. We would only propose providing a connection quote based on the LoA submitted as part of</p>		

		the original request, and any changes or additional LoAs, related to the connection, may require a reapplication (incurring any associated costs)
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.

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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No LoAs could be further strengthened, but the proposals in this urgent modification meet the objectives as set out in the CAP.
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 Given the introduction of CMP376, the LoA at point of application would only be an indication of the status of landownership and that the User has formally engaged in discussions. We accept that subsequent QM milestones are likely to supersede the status of landownership at application moving forward, however we believe that LOAs should be sufficiently strong to allow parties to plan and design the requirements on the back of them. As such, a minimum of 6 to 12 months validity would be acceptable, ensuring that Users remain in formal discussions with the landowners.
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 As this would be indicative only and used as a guide for minimum land values (Minimum acres per MW registered).
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 Click or tap here to enter text.
10	Do you believe that the LoA should be in the form of a standard template? If not, please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
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 For consistency with Distribution LoAs, SPT would suggest retain the word “authorise”, but would accede this point to any relevant legal review.
12	Do you 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 Again, we would refer to legal guidance on this, but we consider it would be suitable for use in both E&W and Scotland.
13	Do you believe that the technology type should be included in the LoA template? If not, please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Even in the case of multiple technologies on the same site, for the same connection point.
14	Do you consider the exemption approach to deal with exceptional circumstances appropriate? If not please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.