

**Workgroup Consultation Response Proforma****CMP434: Implementing Connections Reform**

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](mailto:cusc.team@nationalgrideso.com) by **5pm on 06 August 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 [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Kara Davies	
<b>Company name:</b>	Solar Energy UK	
<b>Email address:</b>	kdavies@solarenergyuk.org	
<b>Phone number:</b>	n/a	
<b>Which best describes your organisation?</b>	<input checked="" 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 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 Workgroup, 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 Workgroup Consultation questions				
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe the Original 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 type="checkbox"/>D</td> </tr> </table>	Original	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
Original	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D			
<p><b>Dear CUSC Team,</b></p> <p>We would like to extend our thanks for the opportunity to engage with the code modification changes. We appreciate the scale of the challenge faced by the networks in their transition to net zero and recognize the considerable effort that has gone into connections reform to date.</p> <p>Solar Energy UK is committed to engaging meaningfully with the connections reform process. However, in this instance, we found it challenging to do so effectively due to the tight deadline and timing of the consultation. Furthermore, we are concerned that a significant amount of detail is being devolved into separate methodologies and guidance, rather than being codified. This makes it extremely difficult to confidently interrogate the modification proposals fully.</p> <p>The lack of codification is a key area of concern. We are still awaiting clear TMO4+ guidance and urge the ESO to provide this as quickly as possible, given the tight timescales of the reform process. Additionally, it is imperative that the guidance itself goes through an industry consultation process before being initiated.</p> <p>We would like to highlight a few notable areas of concern within the code modification consultations:</p> <ol style="list-style-type: none"> <li><b>Changing Site:</b> There are significant concerns regarding element 14 of the CMP435 proposal. Allowing wholesale land changes after Gate 2 undermines due diligence and could lead to speculative applications. The relocation of a project site after Gate 2 undermines the very essence of what a "project" entails. When a customer applies for a project, it is tied to a specific location and design. Permitting the site to be moved after Gate 2 negates this concept and promotes the idea of treating capacity as a tradable commodity—precisely the problem we are trying to overcome. From a customer perspective, if the point of connection (POC) to the network is not as expected, the options should be to either make it work or withdraw the application. Our biggest concern with Element 14 is that it opens the door to potential gaming.</li> <li><b>DNO/TO Interface:</b> The DFTC does not address the current issues in terms of allocating capacity or providing a clear process/methodology. This needs</li> </ol>				

to be reconsidered to ensure that the allocation of capacity is managed effectively. More broadly we are concerned about the lack of attention given to the distribution queue within the connections reform process. The distribution queue is as equally important in our transition to net zero and the industry has yet to receive clarity on key issues including what happens to existing distribution queue positions and how capacity is allocated at gate 2 – and what if any regard is given to current queue positions.

3. **NESO Designation:** The possibility of arbitrary interventions by the ESO under the NESO Designation process is also troubling, as it could negatively impact legitimate developers. The proposal's alignment with DNO processes should be reconsidered, as the current approach seems to contradict established, effective practices at the DNO level, potentially causing confusion and inefficiencies.

We urge the networks to consider the changes they are proposing within the context of the new Government's ambitions, particularly Labour's goal of trebling solar capacity by the end of this Parliament and its enthusiasm for faster delivery. The Government is reactivating the Solar Taskforce, a joint government-industry body charged with establishing the practical measures needed to reach 70GW of generation capacity by 2035. A significant component of this Taskforce is Grid reform, and we urge the ESO to engage with the Taskforce process actively.

More broadly, we are concerned about the rhetoric surrounding solar and energy storage in closed CPAG/CDB meetings. Current discussions around implementing technology limits aimed specifically at solar fundamentally oppose the mantra of connections reform, i.e., first ready, first connect. The ESO and grid operators have always maintained a technology agnostic approach, and such punitive reforms appear to go against this principle. Indeed, it could even undermine the Government's overarching priority to decarbonise the power system, given that solar is the lowest cost form of zero carbon power generation. Given these recent discussions, it also raises a significant concern about the admanance of allowing NESO designation without defining what that entails.

Given these concerns, we would like to propose a bilateral meeting to discuss the issues outlined in this letter in more detail.

Thank you for your attention to these matters. We look forward to your response and hope to work together to ensure a fair and effective connections reform process.

**Yours sincerely,**

Chris Hewett

Chief Executive  
Solar Energy UK

2	Do you support the proposed	<input type="checkbox"/> Yes <input type="checkbox"/> No
---	-----------------------------	---

	implementation approach? (see pages 59-61)	
	Click or tap here to enter text.	
3	Do you have any other comments?	
	Click or tap here to enter text.	
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the <a href="#">Workgroup Consultation Section</a> ) <input type="checkbox"/> No
	Click or tap here to enter text.	

### Specific Workgroup Consultation questions

5	Do you agree with the elements of the proposed solution? Element 7 has been de-scoped and Element 10 is proposed to be codified within the STC through modification <a href="#">CM095</a> . Please provide rationale for your answer and any suggestions for improvement to each element?	
	<b>Element 1:</b> Proposed Authority approved methodologies and ESO guidance (see pages 9-10, 55)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	
	<b>Element 2:</b> Introducing an annual application window and two formal gates, which are known as Gate 1 and Gate 2 (i.e. the Primary Process) (see pages 11, 35-36)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	
	<b>Element 3:</b> Clarifying which projects go through the Primary Process (see pages 11-12, 35-36)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	
	<b>Element 4:</b> Significant Modification Applications concept, including the proposed criteria and the proposed level of codification (see pages 12-13, 36-39)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	
	<b>Element 5:</b> Clarifying any Primary Process differences for customer groups (see pages 13-14, 35-36)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	
	<b>Element 6:</b> Setting out the process and criteria in relation to Application Windows and Gate 1, including	<input type="checkbox"/> Yes

introducing an offshore Letter of Authority equivalent as a Gate 1 application window entry requirement for offshore projects (see pages 15-16, 39-40)	<input type="checkbox"/> No
Click or tap here to enter text.	
<b>Element 7:</b> Fast Track Disagreement Resolution Process (de scoped from this modification – see pages 16, 58)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
<b>Element 8:</b> Longstop Date for Gate 1 Agreements (see pages 16, 40-41)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
<b>Element 9:</b> Project Designation (see pages 17-18, 48-49)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
<b>Element 10:</b> Connection Point and Capacity Reservation (proposed to not be codified within the CUSC, but is intended to be codified within the STC through modification <a href="#">CM095</a> – see pages 18-20 and the <a href="#">CM095 Workgroup Consultation</a> , pages 6-10)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
<b>Element 11:</b> Setting out the criteria for demonstrating Gate 2 has been achieved and setting out the obligations imposed once Gate 2 has been achieved (see pages 20-24, 42-46)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
<b>Element 12:</b> Setting out the general arrangements in relation to Gate 2 (see pages 25-26, 47)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
<b>Element 13:</b> Gate 2 Criteria Evidence Assessment (see pages 26-27, 47-48)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
<b>Element 14:</b> Gate 2 Offer and Project Site Location Change (see pages 28, 46)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
<b>Element 15:</b> Changing the offer and acceptance timescales to align with the Primary Process timescales (e.g. a move away from three months for making licenced offers) (see pages 29, 42-46)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	

	<b>Element 16:</b> Introducing the proposed Connections Network Design Methodology (CNDM) (see pages 29, 53-55)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
	<b>Element 17:</b> Introducing the concept of a Distribution Forecasted Transmission Capacity (DFTC) submission process for Distribution Network Operators (DNOs) and transmission connected Independent Distribution Network Operators (iDNOs) to forecast capacity on an anticipatory basis for Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations aligned to the Gate 1 Application Window (see pages 30-33, 51-53)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
	<b>Element 18:</b> Set out the process for how DNOs and transmission connected iDNOs notify the ESO of Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations which meet Gate 2 criteria (see pages 33-34, 51-53)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
6	Are there any elements of the proposal which you believe should not be included as part of this proposed solution, which the Proposer believes represents the 'Minimum Viable Product' reforms required to the connections process? If not, why not? (Please note the element number in each of your responses if applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
7	As per question 6, are there any additional features which you believe should be included as part of Minimum Viable Product reform to the connections process?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
8	Do you agree that the Gate 1 process should be a mandatory process step, or do you think Gate 1	<input type="checkbox"/> Yes <input type="checkbox"/> No

	should be an optional process step with projects being able to apply straight into the Gate 2 process if the project meets both the relevant Gate 2 and Gate 1 criteria?	
Click or tap here to enter text.		
9	Do you believe that the proposed Gate 1 and Gate 2 process could duly or unduly discriminate against any types of projects? If so, do you believe this is justified?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
10	Please provide your views on the proposed options ((a) to (e) on page 45) to mitigate the risk of requiring a developer to submit their application for planning consent earlier than they would in their development cycle (with the risk this consent could expire and any extension from the Planning Authority is not automatic).	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
11	Do you agree that DFTC should be included as part of CMP434? If not, do you believe that the reformed connections process can function without DFTC? Please justify your answer. (see pages 30-34, 51-53)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
12	The Proposer intends to set out supporting arrangements for TMO4+ via a combination of guidance and methodologies (e.g. DFTC, CNDM, Project Designation, Gate 2	<input type="checkbox"/> Yes <input type="checkbox"/> No

	<p>Criteria). Do you anticipate any issues with having these outside of Code Governance? (see Pages 9-10, 55)</p>	
<p>Click or tap here to enter text.</p>		