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Code Administrator Consultation Response Proforma

CM095: 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 stcteam@nationalenergygyso.com by **5pm GMT on 26 November 2024**. Please note that any responses received after the deadline or sent to a different email address will not be accepted.

If you have any queries on the content of this consultation, please contact stcteam@nationalenergygyso.com

Respondent details	Please enter your details	
Respondent name:	Graham Lear	
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Phone number:	07709 835 895	
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 checked="" 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*)

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For reference the Applicable STC Objectives are:

- a) *efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act*
- b) *development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission*
- c) *facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity*
- d) *protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees*
- e) *promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.*
- f) *facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
- g) *compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.*

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 solutions against the Applicable Objectives?	Mark the Objectives which you believe the proposed solutions better facilitate:
		Original <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input checked="" type="checkbox"/> c <input type="checkbox"/> d <input checked="" type="checkbox"/> e <input checked="" type="checkbox"/> f <input type="checkbox"/> g
		ASM1 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input checked="" type="checkbox"/> c <input type="checkbox"/> d <input checked="" type="checkbox"/> e <input checked="" type="checkbox"/> f <input type="checkbox"/> g
		<p>The Original Proposal and ASM1 both facilitate the STC applicable objectives better than the baseline, particularly in the context of changes proposed under CUSC Modification CMP434.</p> <p>Both the Original Proposal and ASM1 introduce process changes for applications leading to greater coordination in the production of TO Construction Offers. Greater coordination is also reflected in the design process which utilises the proposed Connections Network Design Methodology to bring about a more efficient and coordinated design of the transmission network. They facilitate the work carried out under CUSC Modification CMP434 which itself facilitates effective competition in the generation and supply of electricity. Both introduce a route for reserving connection/interface points and capacity for new applicants.</p>

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2	Do you have a preferred proposed solution?	<div> <input checked="" type="checkbox"/> Original <input type="checkbox"/> ASM1 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference </div> <p>Our preferred option is the Original Proposal. NESO feels that the relevant Licences should set out the appropriate expectations for a review and the process for revising the Methodologies rather than the STC, due to the fact the Methodologies are expected to be derived from such Licences. NESO also believes that the ultimate intention of ASM1 would be to codify the Methodologies, which would hinder NESO's ability to make efficient and decisive changes and impacting our ability to comply with the current and future obligations more broadly. For these reasons, we believe the Original Proposal is better than ASM1. It should also be noted that ASM1 should only be considered if CUSC Modification CMP434 WACM6 is the preferred option in that code modification.</p>
3	Do you support the proposed implementation approach?	<div> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div> <p>We support the general proposed implementation approach. However, it is important to note the interactions between these code changes and their implementation approach and the licence changes required (including in respect of the Methodologies) and we look forward to continuing to work with Ofgem and other key stakeholders to ensure that all aspects of the implementation requirements (including those related to codes and licences) are aligned prior to the implementation date. It is also important to note that additional clarity on the implementation date for these code changes would be useful for NESO (and industry) to have as soon as it is available.</p>

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4	Do you have any other comments?	<p>Upon further review, the CM095 Original Proposal legal text requires several typographical amendments, which will also need to be reflected in the ASM1 legal text:</p> <ul style="list-style-type: none"> • Section D Part Two: <ul style="list-style-type: none"> ○ 2.3, 2.3A, 4.5 – Capitalisation of the word “Application” in “Gated Application and Offer Process”. ○ 2.3A.1 – Capitalisation of the word “Business” in “Business Days”. ○ 2.3A.2 – the removal of square brackets from the text. ○ 2.3A.5 – a semi-colon at the end of the statement.
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