

Public

Code Administrator 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 cust.team@nationalenergyso.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 cust.team@nationalenergyso.com

Respondent details	Please enter your details	
Respondent name:	Bill Scott	
Company name:	Eclipse Power Networks	
Email address:	Bill.Scott@eclipsepower.co.uk	
Phone number:	Click or tap here to enter text.	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" 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 Panel or the industry for further consideration)

Public

For reference the Applicable CUSC (non-charging) Objectives are:

- a) *The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- b) *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;*
- c) *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- d) *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 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 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 type="checkbox"/> d
		WACM4 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM5 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM6 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM7 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		<p>We agree with the Proposer that the impact of the CMP434 Original Proposal is Positive on Applicable CUSC Objectives (ACOs) a), b) and d), and is Neutral regarding ACO c).</p> <p>Each of the WACMs are themselves based upon the Original, along with an incremental variation, so (with</p>

Public

		<p>the exceptions noted below) are Positive on the same ACOs.</p> <p>Whilst being sympathetic with the ambitions of WACMs 3, 4, 5 and 6 to limit the impact of the new Methodologies, we accept that Methodologies will likely be the way forward in the future as the connections market increases in speed and complexity. Accordingly, we conclude that these WACMs will not promote greater efficiency than the Original, and therefore are Neutral per ACO (d).</p>
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/> Original</p> <p><input type="checkbox"/> WACM1</p> <p><input type="checkbox"/> WACM2</p> <p><input type="checkbox"/> WACM3</p> <p><input type="checkbox"/> WACM4</p> <p><input type="checkbox"/> WACM5</p> <p><input type="checkbox"/> WACM6</p> <p><input type="checkbox"/> WACM7</p> <p><input type="checkbox"/> Baseline</p> <p><input type="checkbox"/> No preference</p> <p>We believe that the Original improves upon the Baseline. Collectively WACMs 1, 2 and 7 add further clarity and benefit to the Original. However, if only one choice can be made, no individual WACM exceeds the Original. If a pick-and-mix approach can be taken, the preferred solution would be Original plus WACMs 1,2 and 7.</p>
3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>The wider Connections Reform agenda has necessarily had an aggressive implementation target. Implementation of CMP434 will require several elements to all be in place, including the proposed new</p>

Public

		<p>Methodologies. Providing that this is adhered to, we support the proposed implementation approach.</p> <p>We have concerns over the level of detail pertinent to the proposal being held in methodologies outside of the CUSC, we also note that not all of these are yet published. We would wish to have assurances over the mechanism that these methodologies can be changed in future and how regularly this can occur, or additional uncertainty could be created.</p>
4	Do you have any other comments?	<p>Whilst we are generally supportive of the proposal, this CMP relies heavily upon the proposed new Methodologies and Guidance notes, the contents of which were only possible to see in the very final stages of the Workgroup process. A big change in precedent is being proposed here, as the detailed content of these documents will not be codified within the CUSC. We recognise that this is being proposed for the purpose of improving speed and efficiency, but remain concerned that there is presently no formal governance process for this; we believe that there should be industry-wide scrutiny for such important documents. We would seek assurances over the mechanisms that these methodologies can be changed in future and how regularly this can occur, to avoid additional uncertainty.</p> <p>We believe that significant embedded demand should have been considered in scope - perhaps defined as a single non-domestic customer who triggers, or augments, transmission works. Without this, it could encourage large demand customers to apply via DNOs or IDNOs to avoid this process and trigger transmission works that could delay in-scope projects. Clarity on whether demand via new transmission-connected IDNOs would be in scope is required.</p> <p>Interactions with ENA proposals to raise the entry requirements for DNO projects should be considered - i.e. at least one proposal would exclude DNO projects from gate one. The interaction with the BAU process of assessment year-round by DNOs vs. the window approach by NESO/TOs also needs to be fully</p>

Public

		<p>considered. Assuming the ENA proposals for an option agreement as an entry requirement are not adopted, this could result in DNO customers being in a DNO queue for works ahead of projects that are behind them in the transmission queue. This would be an unworkable situation. The ENA was asked regularly for information on how they propose to manage this, but no detail was provided to the Workgroup. We would suggest this needs to be published before the modification can be implemented, or it will have reduced utility for DNO customers. Interactions with process required to be followed by IDNOs also needs to be considered, as the INA has not been involved in developing these.</p> <p>We see utility in the DFTC process, so again interactions with the proposed Grid Code modification need to be considered. In an ideal world, DNO and TO assessment would be undertaken concurrently, providing an aligned whole-system queue, which would also resolve the issues identified above.</p> <p>We welcome the move to two annual windows; however, we wish to see requirements on the DNOs to action Gate 2 requests codified. DNO customers have been disadvantaged in recent years by DNOs failing to submit Project Progression requests in a timely manner (sometimes taking 1-2 years for a response); with no right of recourse for the customer due to weak provisions in the CUSC. We would like to see timebound, codified obligations on DNOs to action these requests (and the same in DCUSA if necessary) to prevent this discrimination continuing. To allow DNOs time to submit, this may require artificially reducing the window for DNO customers, but this could be considered. We understand the ENA will be encouraging people to submit regularly, but unfortunately acting “as soon as is reasonably practicable” as per the code has failed to produce the required results in the past and perpetuated a perceived injustice towards embedded generators.</p>
--	--	--

Public

		<p>We did have concerns around the treatment of new supply points for transmission-connected IDNOs to facilitate generation. There is a current flaw in BAU if small/medium generators are to connect via a new supply point, that the supply point contract must be issued first before Project Progressions can be submitted, resulting in delays and increased securities under Final Sums and leaving it out of scope of this modification, even if it was always intended for generation. This would not occur for applications to existing supply points, which in turn trigger a new one. We welcome proposals to indicate that any size generation application and supply point application can come concurrently; however, we would like to see more detail and guidance around how a supply point can be classed as "generation triggered" and in scope of the new process, particularly if Final Demand is also requested.</p> <p>The guidance on significant changes is yet to be published, we would also ask that alignment with the ENA's allowable change guidance for DNO connections is considered to avoid conflicting information being provided. This could include a change in the ENA's guidance.</p>
5	Do you agree with the Workgroup's assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the CUSC?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>No observation to make.</p>