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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:	John Greasley	
Company name:	Xlinks	
Email address:	John.greasley@xlinks.co	
Phone number:	07908520002	
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*)

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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 checked="" type="checkbox"/> d
		WACM4	<input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM5	<input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM6	<input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM7	<input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input checked="" type="checkbox"/> c <input checked="" type="checkbox"/> d

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		Xlinks does not support WACM5 or WACM6. Xlinks considers that all others better facilitate the Applicable Objectives, and has no preference amongst them.
2	Do you have a preferred proposed solution?	<input type="checkbox"/> Original <input type="checkbox"/> WACM1 <input type="checkbox"/> WACM2 <input type="checkbox"/> WACM3 <input type="checkbox"/> WACM4 <input type="checkbox"/> WACM5 <input type="checkbox"/> WACM6 <input type="checkbox"/> WACM7 <input type="checkbox"/> Baseline <input checked="" type="checkbox"/> No preference
		Xlinks does not support WACM5 or WACM6. Xlinks considers that all others better facilitate the Applicable Objectives, and has no preference amongst them.
3	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		Xlinks does not consider that 'Q2 2025' is specific enough as an implementation date and that a specific date should be set out now rather than leaving this to the Authority 'in due course'
4	Do you have any other comments?	<p>Xlinks supports the Connection Reform objectives that are being pursued.</p> <p>Specific comments on CMP434:</p> <p>In relation to Element 3, consideration should be given to how new types of Connectee Types are dealt with.</p> <p>The proposed solution should recognise types of</p>

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		<p>projects that don't neatly fit within existing classifications that are currently being developed, have got existing connection agreements and hence will have to satisfy Gate 2 criteria. It is essential that any proposed solution does not negatively impact projects such as these that are progressing positively albeit via slightly different routes than the more 'traditional' connectee types set out in Element 3. If this does not happen there is a risk that projects that offer value to UK consumers via positive contribution to security of supply, operation, provision of ancillary services, and contribution to net zero may be frustrated.</p> <p>Xlinks considers that removing Project Designation (as envisaged by WACM5) is not appropriate. A Designation process is essential to ensure that projects which will contribute positively to clean power (as defined in the associated methodology) are not prevented from progressing by the Connection Reform initiatives.</p> <p>Xlinks does not support WACM6 (Obligation to Codify the Methodologies and Guidance Documents under Connection Reform). We believe that this would place an unnecessary burden on the NESO, and that it is incumbent upon the Code Administrator to keep under review the efficiency and effectiveness of the Codes and related methodologies and bring forward amendments (when necessary), as indeed any other CUSC Party is able to do.</p>
5	Do you agree with the Workgroup's assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms	<div> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div> <div>Click or tap here to enter text.</div>

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	and conditions held within the CUSC?	
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