

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 cusc.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 cusc.team@nationalenergyso.com

Respondent details	Please enter your details	
Respondent name:	Rachel Hodges	
Company name:	Cubico Sustainable Investments Ltd	
Email address:	Rachel.hodges@cubicoinvest.com	
Phone number:	07765144505	
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*)

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

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- 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 type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM4 <input type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM5 <input checked="" type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM6 <input type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM7 <input type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
Click or tap here to enter text.		
2	Do you have a preferred proposed solution?	<input type="checkbox"/> Original <input type="checkbox"/> WACM1 <input checked="" type="checkbox"/> WACM2 <input type="checkbox"/> WACM3

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		<input type="checkbox"/> WACM4 <input type="checkbox"/> WACM5 <input type="checkbox"/> WACM6 <input type="checkbox"/> WACM7 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		<p>WACM 1 may avoid issues where overlap with proposed GC0117 changes could cause confusion. Or unnecessary issues. We are relying on the GC0117 review to deal with this.</p> <p>WACM 2 addresses an issue that we have seen in practice where a DNO is slow or uninclined to submit, clock-start or accept PP's on time. This has led to delays of up to 2.5 years for embedded generators. This should be mitigated in the future.</p> <p>WACMs 3 and 5 are related to the re-allocation of spare capacity and are dealt with in the proposed methodologies. As CMPs can be raised by any CUSC signatory then it is assumed that Methodology changes can also be proposed by the same signatories. If the proposed methodologies are not seen as efficient or fair and transparent in their application, then there should be a way to request a review of them.</p> <p>WACMs 4 and 6 suggest that elements that are in the methodologies need to be codified. Although we understand why this has been proposed we agree that because of the fast-changing nature of the energy landscape that this would delay implementation and the ability to react. Therefore, we do not support these WACMs. BUT we will be responding to the consultations on the methodologies and we expect Ofgem to be responsible for ensuring that NESO provide significantly more detail and information to ensure that the implementation of these methodologies are fair and transparent.</p> <p>WACM 7 has fundamentally been raised because of a lack of data and transparency related to the 'Whole Queue to Gate 2' process. It is difficult to assess whether this is needed and what impact it would have. As it could result in a</p>

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		second round of studies and re-allocation of capacity and a further delay in firm offers then it may cause more harm than good. But the publication of a Gate 2 register or a 'Whole Queue' will be important to enable developers to have a clear view of where projects are needed.
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
4	Do you have any other comments?	<p>In Element 15, it is important to ensure that the delays that have happened in the last couple of years in processing grid connection applications and in providing firm offers with a connection location are not allowed to continue – the proposal does not codify the required timescales expected of NESO / TOs to provide offers and this could mean that more delays are seen. Although they are proposed in the methodology documents, that may not give Ofgem the required teeth to ensure they are met. This should be carefully considered.</p> <p>Element 11 does not line up with the expectations set out by the ENA for embedded projects. We agree with the timescales proposed here as they are realistic and take into account the amount of work required prior to submitting planning, especially for solar and wind projects of a significant scale. But would ask that there be some coordination between ENA and NESO on the requirements for Embedded Generators as they are currently expected to submit planning within 2-14 months of accepting a BEGA/PP.</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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.