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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 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:	Deborah MacPherson / Ciaran Fitzgerald	
Company name:	Scottish Power Renewables	
Email address:	Cfitzgerald@scottishpower.com	
Phone number:	07867 191168	
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:

- 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 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 type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input 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 checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM6 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM7 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
<ul style="list-style-type: none"> In our view, the original proposal provides a viable solution to address the defect and is an improvement on the baseline. We recognize the need for significant change to the connections process and believe that the original proposal provides an appropriate structure, which can facilitate the further changes required to achieve the ultimate aims of TMO4+. As has been 		

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		<p>discussed by workgroup members during the workgroup meetings and in the report, it should be highlighted that the detailed processes and procedures that will sit within the new structure will be housed within the methodologies, and as such are not being assessed as part of this consultation.</p> <ul style="list-style-type: none"> • WACM1 - We recognize the intention behind the WACM and support the desire to provide a clarity to Users. However, we have noted the challenges experienced during the workgroup's attempts to provide satisfactory legal text to facilitate this change. We also have concerns over the implications of this change to other sections of the code and the requirements for further changes that would be required as a result in this WACM. • WACM2 – We believe this facilitates better competition and ensures efficiency, fairness, and transparency by ensuring that embedded users are not disadvantaged relative to transmission connected users. • WACM3 - We support that codifying this process will demonstrate fairness and transparency for all users, which will facilitate competition and reassure investors that all viable projects are given fair and equal opportunity to progress to connection, as far as is practical. • WACM4 – We support this proposal in that it provides clarity and detail to the outcomes of the red line boundary constraints. This ensures all users will understand the implications of introducing this constraint and should ensure that all users are treated equally in respect of any changes being made to the red line boundary. The clarification of treatment of staged and hybrid connections ensures viable technologies within these agreements will have the opportunity of progress where appropriate. • WACM5 – We support this proposal as it would further ensure fairness, transparency and equal project of all users and remove the potential for
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		<p>legal challenges against NESO resulting from the outcome of the designation process.</p> <ul style="list-style-type: none"> • WACM6 – We support this proposal as we believe it is an appropriate compromise to the disagreements held during the workgroup over whether the methodologies should be put into code. This proposal allows the NESO to progress with reform and realise the benefits, whilst ensuring that the methodologies are subject to appropriate consultation and scrutiny within a defined time period, and also allow for an initial impact assessment to be considered during that process. • WACM7–We support this proposal, primarily for its benefits within the 435 process. We believe this proposal will benefit users in ensuring transparency of the potential queue and allow users to make more informed investment decisions. It will also minimize wasted efforts by NESO and the network businesses by facilitating the reduction of the queue at an earlier stage, and prior to the gated design process.
2	Do you have a preferred proposed solution?	<p> <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 </p> <p>Click or tap here to enter text.</p>

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3	Do you support the proposed implementation approach?	<div> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div> <p>We support the implementation approach having understood the challenges NESO are facing in implementing the significant reforms within an accelerated timeframe. However, we do have the following concerns over the implementation approach:</p> <ul style="list-style-type: none"> • The lack of detail and defined dates within the implementation approach mean it cannot be properly assessed as acceptable or otherwise. • This lack of detail also makes it impossible for industry participants to fully plan for the implementation. • As is noted in the consultation document, there are various changes and approvals required prior to implementation. We would see this as a significant risk to the high-level programme set out in the Implementation Approach • Since 02/09/24, any applications for a direct connection into the transmission network have been resulting in a transitional offer. On current timescales, a project could have secured gate 2 readiness in early September 2024, could wait until early 2026 before receiving a Gate 2 grid agreement. This would mean that the project must choose to continue to invest and develop, without key information including point of connection, securities/liabilities, and connection costs. • Whilst there is a high-level programme which could inform when the first gate design process will go ahead for the existing queue, there is no clarity at all on when the first gate window for new applicants will be.
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4	Do you have any other comments?	Click or tap here to enter text.
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 type="checkbox"/> Yes <input type="checkbox"/> No
		We are satisfied that the modification does not impact the EBR Article 18 terms and conditions.