

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](mailto: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](mailto:cusc.team@nationalenergyso.com)

| Respondent details                             | Please enter your details   |   |
|--|---|---|
| <b>Respondent name:</b>                        | Nina Brundage   |   |
| <b>Company name:</b>                           | Ocean Winds   |   |
| <b>Email address:</b>                          | Nina.brundage@oceanwinds.com  |   |
| <b>Phone number:</b>                           | +44 7768227297  |   |
| <b>Which best describes your organisation?</b> | <input type="checkbox"/> Consumer body<br><input type="checkbox"/> Demand<br><input type="checkbox"/> Distribution Network Operator<br><input checked="" type="checkbox"/> Generator<br><input type="checkbox"/> Industry body<br><input type="checkbox"/> Interconnector | <input type="checkbox"/> Storage<br><input type="checkbox"/> Supplier<br><input type="checkbox"/> System Operator<br><input type="checkbox"/> Transmission Owner<br><input type="checkbox"/> Virtual Lead Party<br><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 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    |
| Click or tap here to enter text.                   |  |   |
| 2  | Do you have a preferred proposed solution?   | <input checked="" type="checkbox"/> Original<br><input type="checkbox"/> WACM1<br><input type="checkbox"/> WACM2                                      |

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|   |   |  |
|---|---|--|
|   |   | <input type="checkbox"/> WACM3<br><input type="checkbox"/> WACM4<br><input type="checkbox"/> WACM5<br><input type="checkbox"/> WACM6<br><input type="checkbox"/> WACM7<br><input type="checkbox"/> Baseline<br><input type="checkbox"/> No preference  |
|   |   | Click or tap here to enter text.   |
| 3 | Do you support the proposed implementation approach?  | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No   |
|   |   | Click or tap here to enter text.   |
| 4 | Do you have any other comments?                       | <p>Ocean Winds remains concerned that a significant scope of the Connections Reform Methodologies will sit outside of the CUSC. This dilutes the content of the CUSC and means that key processes that will have a significant impact on Users will not be subject to standard CUSC governance procedures. This is especially concerning given that the proposed licence changes that will put the obligations on NESO to maintain and consult on methodologies have not yet been published by Ofgem for public review and consultation. While we understand that NESO is running a host of consultations related to Connections Reform in parallel, the lack of clarity on licence changes could have a material impact on the long-term efficacy of this proposal.</p> |
| 5 | Do you agree with the Workgroup's assessment that the | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No   |

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|  |   |                                  |
|--|---|----------------------------------|
|  | modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the CUSC? | Click or tap here to enter text. |
|--|---|----------------------------------|