

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>	Charles Yates	
<b>Company name:</b>	Muir Mhòr Offshore Wind Farm Ltd	
<b>Email address:</b>	charles.yates@vattenfall.com	
<b>Phone number:</b>	07768337854	
<b>Which best describes your organisation?</b>	<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)

## 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 type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM1	<input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM2	<input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM3	<input type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM4	<input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM5	<input type="checkbox"/> a <input 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
		An important benefit of CMP434 is quicker connections for projects that are in a better position to progress to connection.	
Muir Mhor is a floating offshore wind farm which will be located off the east coast of Scotland, approximately 63km from Peterhead. When operational, it will have capacity of up to 1GW. The project is ready and able to			

## Public

		<p>quickly progress to connection and welcomes CMP434 and acceleration of grid connections.</p> <p>WACM6 enhances the delivery of CUSC Objectives b and d by making the connections reform process more transparent and accessible.</p> <p>WACM7 also enhances competition and efficiency by providing Gate 2 qualified applicants with an opportunity to revise their application based on the results of the Gate 2 compliance check and updated competitor information, the CP30 regional technology quota proposals, and any NESO project designations. This will facilitate more informed Gate 2 applications and so enhance the delivery of CP30 and Net Zero</p>
2	Do you have a preferred proposed solution?	<p><input type="checkbox"/> Original</p> <p><input type="checkbox"/> WACM1</p> <p><input type="checkbox"/> WACM2</p> <p><input checked="" type="checkbox"/> WACM3</p> <p><input type="checkbox"/> WACM4</p> <p><input checked="" type="checkbox"/> WACM5</p> <p><input checked="" type="checkbox"/> WACM6</p> <p><input checked="" type="checkbox"/> WACM7</p> <p><input checked="" type="checkbox"/> Baseline</p> <p><input type="checkbox"/> No preference</p> <p>The delivery of the CUSC objectives, Clean Power 2030 and Net Zero are enhanced by our preferred WACMs, particularly WACMs 6 and 7. These two important WACMs improve the Baseline solution</p>
3	Do you support the proposed implementation approach?	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>We broadly support the proposed implementation approach but have concerns with the timeline, etc.</p>

## Public

		<p>There is a need to be realistic / flexible to allow adequate time for developers to meet Gate 2 criteria.</p> <p>Importantly, there is a need to see the three Connections Reform Methodologies and NESO's Guidance documents as soon as possible along with the regulatory framework / governance for them. Without these documents we do not have a full picture and cannot fully assess NESO's Connections Reform proposals.</p> <p>There is a need for the proposed implementation approach to be clear on when stakeholders will need to act, when connection offers will be made, etc.</p>
4	Do you have any other comments?	<p>Allowing industry to help develop the full proposed Connections Reform solution, including Methodologies, Guidance and Implementation Approach would build support and lead to a code modification which is easier to implement in practice and better facilitates delivery of the CUSC objectives.</p> <p>The related concepts of Capacity Reservation and of Connection Point Reservation in the Connections Reform legal text reduce the valuable flexibility to optimise the connections queue to accelerate projects which can best contribute to achieving CP30. The draft text allows NESO discretion to reserve certain Connection Points and available capacity at those Connection Points for the use of projects its selects. These provisions usurp the standard two-gate process to some degree, specifically by allowing such Connection Points or capacity to be reserved in advance of their progress to Gate 2.</p>
5	Do you agree with the Workgroup's assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>

## Public

	and conditions held within the CUSC?	
--	--------------------------------------	--