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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](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>                        | Ahmed Dabb  |   |
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| <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 type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d                                    |
|  |  | WACM2 <input type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" 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 checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d                         |
|  |  | WACM5 <input type="checkbox"/> a <input checked="" 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 checked="" type="checkbox"/> d                                    |
|  |  | WACM7 <input type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d                         |
|  |  | WACM2 is especially key as it transitions the obligation from a “reasonable endeavours” approach in the original proposal to an obligation. This change ensures |

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|   |  | fairness and equity between distribution and transmission customers, addressing key considerations for balanced system operation meeting key reform objectives of reaching net zero goals and ensuring energy security across the nation.   |
| 2 | Do you have a preferred proposed solution?           | <p> <input type="checkbox"/> Original<br/> <input type="checkbox"/> WACM1<br/> <input type="checkbox"/> WACM2<br/> <input type="checkbox"/> WACM3<br/> <input type="checkbox"/> WACM4<br/> <input checked="" type="checkbox"/> WACM5<br/> <input type="checkbox"/> WACM6<br/> <input type="checkbox"/> WACM7<br/> <input type="checkbox"/> Baseline<br/> <input type="checkbox"/> No preference         </p> <p>The preferred proposed solution is WACM5. This is due to it eliminating the ambiguity surrounding what NESO can classify as critical system operations, reducing the potential for unjustified or unfair treatment. By addressing this uncertainty, WACM5 ensures that projects are not unfairly favoured for indistinct reasons and provides a more transparent and challengeable framework.</p> |
| 3 | Do you support the proposed implementation approach? | <p> <input checked="" type="checkbox"/> Yes<br/> <input type="checkbox"/> No         </p> <p>Moving forward, it would be beneficial to provide a clearer timeline with sufficient time for all parties to prepare for the 'Go Live Date'. Given that a decision is not expected within the next month, the implementation date should target the end of Q2 2025 rather than the beginning to allow developers ample time to make informed decisions.</p>  |
| 4 | Do you have any other comments?                      | Transparency and data visibility are critical moving forward. It is essential to have a clear understanding of the reduced queue, including how many projects fall within Gate 2 Criteria. This could be achieved through ensuring data is  |

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|   |   | <p>publicly accessible in a similar way the TEC register. This data should be expanded to include more detailed information, such as, the zones in which projects are located, the gate at which projects accepted or received their offers, with an indication of key milestones.</p> <p>Hybrid projects should demonstrate their respective capacities for each technology and reflection of DNO-contracted capacity on the network, specifying what has been secured in each gate. Providing clarity and detailed data will support users in making well-informed decisions, particularly given the short time frames allocated for gated criteria.</p> <p>Finally, it is vital users gain greater clarity on expected application fees throughout this process.</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? | <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>  |