

Public

Code Administrator Consultation Response Proforma

CMP435: Application of Gate 2 Criteria to existing contracted background

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.

Please be aware that late responses will not be accepted.

If you have any queries on the content of this consultation, please contact elana.byrne@nationalenergyso.com and catia.gomes@nationalenergyso.com or cusc.team@nationalenergyso.com

Respondent details	Please enter your details	
Respondent name:	Simon Wragg	
Company name:	Ethos Green Energy Solutions Limited	
Email address:	simon@ethosgreenenergy.com	
Phone number:	07879534335	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input checked="" type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input checked="" 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:

- 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 solution(s) against the Applicable Objectives?	<p>Mark the Objectives which you believe the proposed solution(s) better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/>a <input type="checkbox"/>b <input type="checkbox"/>c <input type="checkbox"/>d</td> </tr> <tr> <td>WACM1</td> <td><input type="checkbox"/>a <input type="checkbox"/>b <input type="checkbox"/>c <input type="checkbox"/>d</td> </tr> </table> <p>We agree the Original Solution (NESOs proposals) and all alternative solutions are better than the existing process (the baseline).</p>	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
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					
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/> Original</p> <p><input type="checkbox"/> WACM1</p> <p><input type="checkbox"/> Baseline</p> <p><input type="checkbox"/> No preference</p> <p>Click or tap here to enter text.</p>				
3	Do you support the proposed implementation approach?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>				

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		<p>Ethos would like the implementation date to be immediately after the Authority Approval date (or as close as reasonably practicable) to ensure Gate 2 Offers are issued ASAP, providing investor certainty. Innova is concerned by the assumption that 56 calendar days are required between the Approval date and the Implementation date.</p> <p>Ethos strongly agree that developers will be able to realign their connection offer with the actual land they have procured as part of the process of applying the Gate 2 criteria to the existing queue.</p> <p>We believe any projects that is sufficiently advanced should be immune from any gate 2 requirements. We categorise this as projects which have connections dates before and up to end 2028, projects that have submitted / obtained planning, a route to market such as a CFD or PPA. T</p> <p>This is to ensure that there is a minimal delivery in reaching our Clean Power 2030 target. Any reform must ensure that it does not impede the delivery of viable projects which have already shown the intent to build.</p>
4	Do you have any other comments?	We have serious concerns in relation to the implementation of these proposed reforms in regard to the NESO proposed CP30 pathways for 2030 which has not taken into account current projects in the planning system for both TO and DNO Connections.
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
		No Comment