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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: | Steffan Jones | |
| Company name: | Electricity North West Limited (ENWL) | |
| Email address: | steffan.jones@enwl.co.uk | |
| Phone number: | 07825 939 626 | |
| Which best describes your organisation? | <input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network Operator <input 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)

For reference, the Applicable CUSC (non-charging) Objectives are:

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- 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 checked="" type="checkbox"/>a <input checked="" type="checkbox"/>b <input type="checkbox"/>c <input type="checkbox"/>d</td> </tr> <tr> <td>WACM1</td> <td><input checked="" type="checkbox"/>a <input checked="" type="checkbox"/>b <input type="checkbox"/>c <input type="checkbox"/>d</td> </tr> </table> <p>For the Original we are neutral to both (c) and (d), for WACM1 we are neutral to (c) but negative to (d), we do not believe the resulting pause/delay is appropriate for 435/whole queue. In both cases we note (under d) the increased administration and resource drain / demand that this modification will require</p> | Original | <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d | WACM1 | <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d |
| Original | <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d | | | | | |
| WACM1 | <input checked="" type="checkbox"/> a <input checked="" 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 checked="" type="checkbox"/>Yes</p> <p><input type="checkbox"/>No</p> | | | | |

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|---|---|--|
| | | <p>We can generally agree with the principles of the implementation process, but wish to highlight our significant concerns over the ability to deliver in the timescales proposed and in the manner detailed. The volume of work required to complete the Gate 2 checks for the existing pipeline and the impact on resource is not to be overlooked. The level of audit/checking required, on the volume of schemes, the options for alternative “Gate 2 Routes” being developed and the scale of challenge these will initiate is significant.</p> <p>For the proposed approach to work, each step, undertaken by each party will need to complete, sequentially, on time and to the required standards. A single delay, avoidable or unavoidable, by any party could impact the whole process and therefore, likely, impact customer experience and potentially project viability. Workable timescales are therefore essential to successful implementation.</p> |
| 4 | Do you have any other comments? | <p>For connections reform to work we need 435 to implement effectively, and therefore efficiently. We need to do everything possible to facilitate implementation and allow the process to deliver a Gate 2 to Whole Queue process that will allow dates to be brought forward. Sufficient time will be critical.</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 checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p> |