

## Workgroup Consultation Response Proforma

### CM095: 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 [stcteam@nationalgrideso.com](mailto:stcteam@nationalgrideso.com) by **5pm on 06 August 2024**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact [stcteam@nationalgrideso.com](mailto:stcteam@nationalgrideso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Paul Jones	
<b>Company name:</b>	Uniper UK Ltd	
<b>Email address:</b>	paul.jones@uniper.energy	
<b>Phone number:</b>	Click or tap here to enter text.	
<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 Workgroup, Panel or the industry for further consideration*)

#### For reference the Applicable STC Objectives are:

- efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act*
- development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission*
- facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity*
- protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees*

- e) *promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.*
- f) *facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
- g) *compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.*

**Please express your views in the right-hand side of the table below, including your rationale.**

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the Original solution better facilitates: Original <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> F <input type="checkbox"/> G Click or tap here to enter text.
2	Do you support the proposed implementation approach? (see page 12)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
3	Do you have any other comments? No thank you.	
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the <a href="#">Workgroup Consultation Section</a> ) <input checked="" type="checkbox"/> No Click or tap here to enter text.

Specific Workgroup Consultation questions		
5	Do you agree with the components of the proposed solution? Please provide rationale for your answer and any suggestions for improvement to each component.	
	<b>Component A:</b> Proposed Reformed Connections Process and Timescales, including ESO/TO obligations (see pages 5-6)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Although, we do have reservations about some of the proposed methodologies and guidance notes that have been proposed. We believe some of these should be contained in the relevant code instead. More detail on this is set out in our response to CUSC modification CMP434.		
<b>Component B:</b> Connections Network Design Methodology (see pages 6, 8-9)		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
We believe that the CNDM would be a suitable candidate to be set out in a methodology as proposed. Alternatively, it could be included as legal text or as a procedure sitting within the STC.		
<b>Component C:</b> Connection Point and Capacity Reservation (see pages 6-10)		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Given the explanation for why this is needed, it appears sensible to be continued in the new process, particularly if this is likely to only be used sparingly. However, as it effectively results in sterilising capacity which could be made available to others, it is important that this process is undertaken in a transparent manner to allow its use to be scrutinised by other potential connecting parties, as well as Ofgem.		
6	Do you agree that the Proposer has fully identified the high-level impacts (subject to legal text drafting) on the STC and STCPs as a result of the <a href="#">CMP434</a> Proposal? If you do not agree, what else do you think is impacted and/or needs to change? (see page 3)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
7	In your consideration of the CM095 proposal, are there any potential risks for implementation which might also impact the <a href="#">CMP434</a> or <a href="#">CMP435/CM096</a> proposals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Click or tap here to enter text.		

