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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 cust.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 cust.team@nationalenergyso.com

Respondent details	Please enter your details	
Respondent name:	Luke Scott	
Company name:	Northern Powergrid	
Email address:	Luke.scott@northernpowergrid.com	
Phone number:	07549445961	
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)

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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 checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM2 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM3 <input checked="" type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM4 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM5 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input 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 type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
The original proposal is essential for removing stalled schemes from the queue, allowing shovel-ready projects to advance with enduring connections. The WACMs further enhance this by ensuring that the implementation of the CUSC modification fully benefits the connection reform process by facilitating effective checks and promoting efficiency.		

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		<p>WACM2: Due to the detailed nature of application submissions, it will be challenging for DNOs to achieve this with absolute certainty. This will require more case-by-case discussions and consultations. However, we agree with the principle of using best endeavours.</p> <p>WACM3: The current Reallocation of Capacity policy is satisfactory and does not need further codification.</p> <p>WACM5: Project designation should be implemented to support infrastructure projects that are critical to the UK network.</p> <p>WACM7: Delaying or pausing the connection reform process is not helpful, as there is already a plan to implement the changes without pause.</p>
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/> Original</p> <p><input checked="" type="checkbox"/> WACM1</p> <p><input type="checkbox"/> WACM2</p> <p><input type="checkbox"/> WACM3</p> <p><input checked="" type="checkbox"/> WACM4</p> <p><input type="checkbox"/> WACM5</p> <p><input checked="" type="checkbox"/> WACM6</p> <p><input type="checkbox"/> WACM7</p> <p><input type="checkbox"/> Baseline</p> <p><input type="checkbox"/> No preference</p> <p>1. WACM1: We support changing the definitions from “Small and Medium Relevant Embedded” to a specific megawatt (MW) requirement. This adjustment will provide clearer understanding within the industry regarding what needs to undergo a Transmission Impact Assessment (TIA).</p> <p>2. WACM4: We endorse codifying the restrictions to the red line boundary to ensure the industry has a say in how these boundaries are shaped and modified in the future. While we believe this</p>

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		<p>should not be included in the current code to avoid delays, it should be addressed at a later stage.</p> <p>3. WACM6: We advocate for codifying the methodologies to guarantee industry input on future changes. Similar to WACM4, we feel this should be handled separately from the current code to prevent any delays in the process.</p>
3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
4	Do you have any other comments?	<p>We believe there is two points which need to be looked at either as part of this code or outside in another. Which is about aligning Distribution (D) customers with Transmission (T) customers. At application 'T' customers can apply directly at Gate 2 where 'D' can't, and then when issuing the 'T' offer to customers, 'T' get 90 days where 'D' customers (schemes contracted with DNOs) only get 30 days to accept.</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>