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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 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

Respondent details	Please enter your details	
Respondent name:	Claire Hynes & Tim Ellingham	
Company name:	RWE Renewables (Swindon) Ltd. & RWE Supply & Trading Ltd.	
Email address:	Claire.hynes@rwe.com or tim.ellingham@rwe.com	
Phone number:	07787273960	
Which best describes your organisation?	<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 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 type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM1 <input checked="" type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM2 <input checked="" type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM3 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM4 <input checked="" type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM5 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" 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 checked="" type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		<p>It is worth noting that there is no ability on this form to state the objectives that we do not consider are better facilitated by the proposed solution which is likely to give an erroneous view when calculated.</p> <p>The 'first come, first served' connection process approach has needed to be reformed to address the needs of a wider variety of technology connecting to the grid for some time.</p>

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		<p>The new transmission connection process batches projects in a co-ordinated network design that links to strategic planning. This new approach should lead to more reliable signals for future investment which will help to ensure that the transmission works are delivered more efficiently in line with Objective (a). The barriers introduced to remove speculative projects from the connection queue should lead to a more efficient administration of the CUSC arrangements under Objective (D).</p> <p>We consider that WACM 2 better facilitates the efficiency in the administration of the CUSC arrangements by introducing timing on the requirements for the DNO/iDNO to submit minimum information for all projects that have signalled Gate 2 compliance ahead of Gate 2 application window closure.</p> <p>We consider that the '<i>pause</i>' period proposed under WACM 7, provides a practical 10 Business days to assess the viability of a project in light of the new connection queue which could create a natural attrition of projects that would promote greater efficiency in the implementation and administration of these arrangements than the original.</p>
2	Do you have a preferred proposed solution?	<p><input type="checkbox"/> Original</p> <p><input type="checkbox"/> WACM1</p> <p><input type="checkbox"/> WACM2</p> <p><input type="checkbox"/> WACM3</p> <p><input 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>Our overall preference is WACM 6 which simplifies the new transmission connection process by ensuring the obligations linked to the final version of the guidance documents and methodologies are reviewed and formally recommended by experts in the CUSC Modification Panel for the appropriate</p>

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		documents to be codified at a future date. This will ensure that the appropriate connection reform documentation is held under one code for simplicity and provide new market entrants with the support of an open governance framework throughout every aspect of the connection process, thus promoting the efficiency in the implementation and administration of the CUSC arrangements.
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>RWE is supportive of the notification of the evidence submission window being provided 4 weeks in advance with the expectation that the window will be at least 4 weeks in accordance with the implementation approach set out in the CMP434 change report.</p>
4	Do you have any other comments?	We are concerned that the new transmission connection process has still not addressed the shortcomings of the embedded distribution connection process which leaves projects waiting on the actions of another party (DNO/iDNO) to be entered in to Gate 2. We note that this change is introducing the minimum viable product (MVP) new transmission connection process and we encourage NESO to revisit these arrangements to introduce a one point of application process for Users.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>To the best of our knowledge, we do not consider that Article 18 of the EBR is impacted by this code change.</p>