

CMP446 Increasing the lower threshold in England and Wales for Evaluation of Transmission Impact Assessment

Workgroup Meeting 1, 24 January 2025

Online Meeting via Teams

WELCOME

Agenda

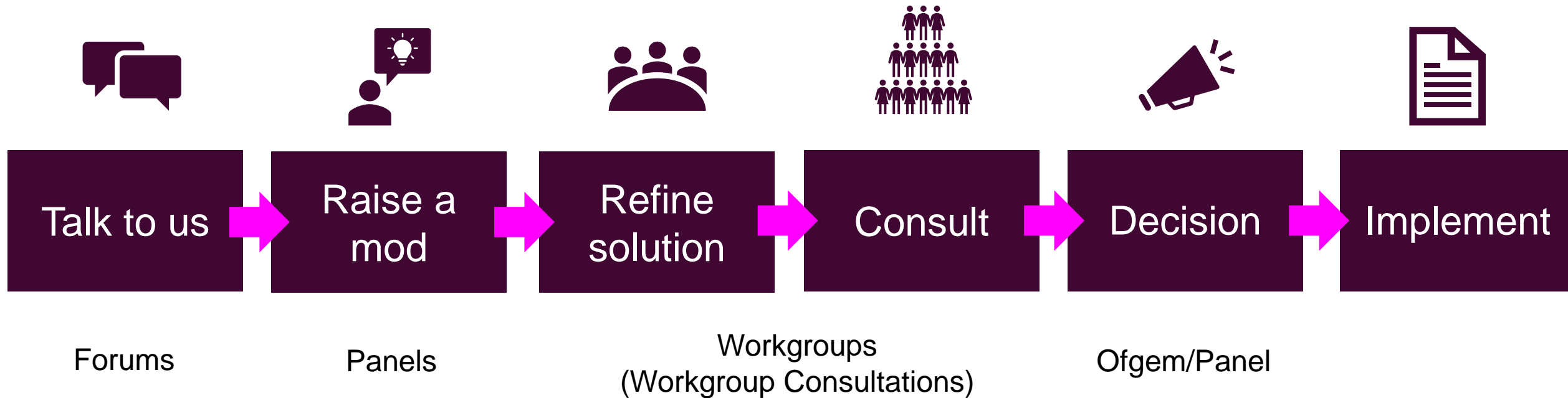
Topics to be discussed	Lead
Introductions	Chair
Code Modification Process Overview <ul style="list-style-type: none">• Workgroup Responsibilities• Workgroup Alternatives and Workgroup Vote	Chair
Objectives and Timeline <ul style="list-style-type: none">• Walk-through of the timeline for the modification	Chair
Review Terms of Reference	All
Proposer presentation	Proposer
Questions from Workgroup Members	All
Agree Terms of Reference	All
Cross Code Impacts	All
Any Other Business	Chair
Next Steps	Chair

Modification Process

Milly Lewis – NESO Code Administrator



Code Modification Process Overview



Refine Solution Workgroups



- If the proposed solution requires further input from industry in order to develop the solution, a Workgroup will be set up.
- The Workgroup will:
 - further refine the solution, in their discussions and by holding a **Workgroup Consultation**
 - Consider other solutions, and may raise **Alternative Modifications** to be considered alongside the Original Modification
 - Have a **Workgroup Vote** so views of the Workgroup members can be expressed in the Workgroup Report which is presented to Panel

Consult Code Administrator Consultation

- The Code Administrator runs a consultation on the **final solution(s)**, to gather final views from industry before a decision is made on the modification.
- After this, the modification report is voted on by Panel who also give their views on the solution.



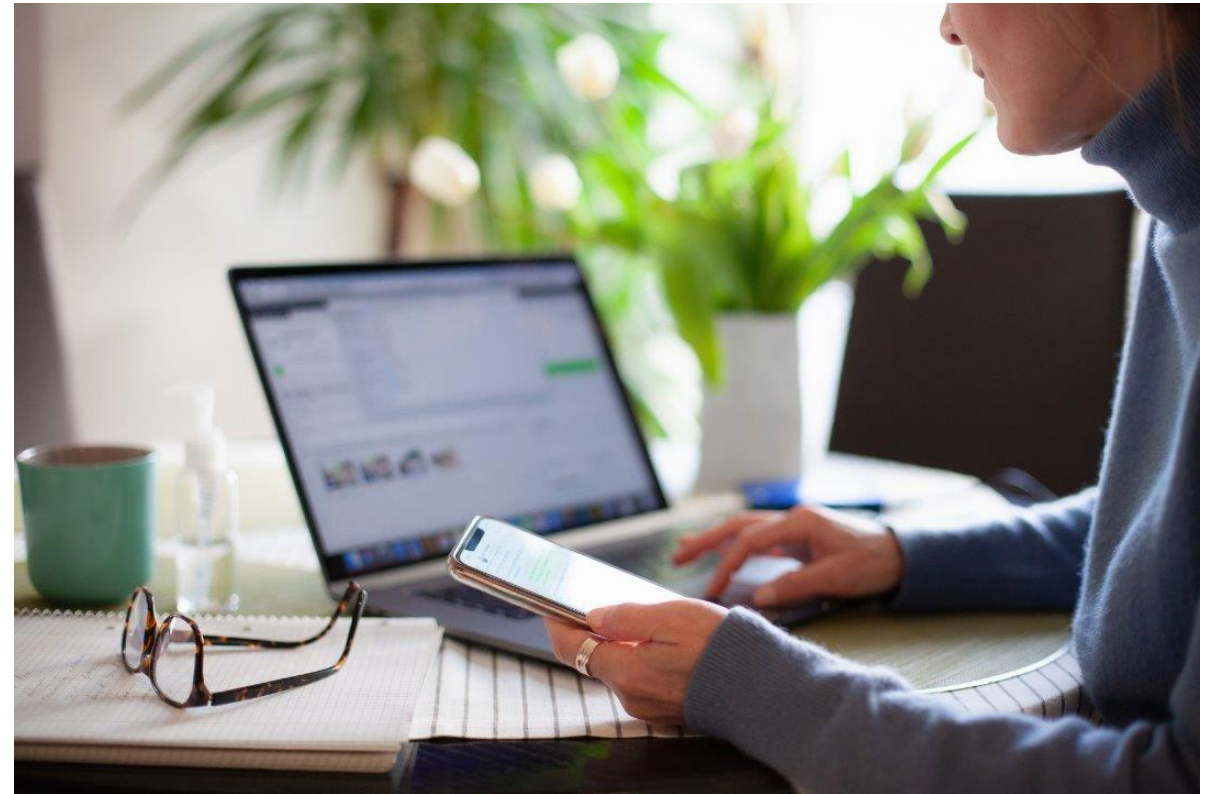
Decision



- Dependent on the Governance Route that was decided by Panel when the modification was raised
- **Standard Governance:** Ofgem makes the decision on whether or not the modification is implemented
- **Self-Governance:** Panel makes the decision on whether or not the modification is implemented
 - an appeals window is opened for 15 days following the Final Self Governance Modification Report being published

Implement

- The Code Administrator implements the final change which was decided by the Panel / Ofgem on the agreed date.



Workgroup Responsibilities and Membership

Milly Lewis – NESO Code Administrator



Public Expectations of a Workgroup Member

Contribute to the discussion

Be respectful of each other's opinions

Language and Conduct to be consistent with the values of equality and diversity

Do not share commercially sensitive information

Be prepared - Review Papers and Reports ahead of meetings

Complete actions in a timely manner

Keep to agreed scope

Email communications to/cc'ing the .box email

Your Roles

Help refine/develop the solution(s)

Bring forward alternatives as early as possible

Vote on whether or not to proceed with requests for Alternatives

Vote on whether the solution(s) better facilitate the Code Objectives

Workgroup Membership

Role	Name	Company
Proposer	Martin Cahill	NESO
Workgroup Member	Brian Hoy	Electricity North West
Workgroup Member	Dan Clarke	National Grid Electricity Transmission (nominated by NESO)
Workgroup Member	Drew Johnstone	Northern Powergrid
Workgroup Member	Garth Graham	SSE Generation
Workgroup Member	Helen Stack	Centrica
Workgroup Member	Jack Purchase	National Grid Electricity Distribution
Workgroup Member	Joe Colebrook	Innova Renewables
Workgroup Member	Kate Teubner	Low Carbon
Workgroup Member	Kyran Hanks	WWA (nominated as a CUSC Panel Member)
Workgroup Member	Nina Sharma	Drax
Workgroup Member	Ross O'Hare	SSEN
Workgroup Member	Zivanayi Musanhi	UK Power Networks
Authority Representative	Alasdair MacMillan	Ofgem

Workgroup Alternatives and Workgroup Vote

Milly Lewis – NESO Code Administrator



What is the Alternative Request?

What is an Alternative Request? The formal starting point for a Workgroup Alternative Modification to be developed which can be raised up until the Workgroup Vote.

What do I need to include in my Alternative Request form? The requirements are the same for a Modification Proposal you need to articulate in writing:

- a description (in reasonable but not excessive detail) of the issue or defect which the proposal seeks to address compared to the current proposed solution(s);
- the reasons why you believe that the proposed alternative request would better facilitate the Applicable Objectives compared with the current proposed solution(s) together with background information;
- where possible, an indication of those parts of the Code which would need amending in order to give effect to (and/or would otherwise be affected by) the proposed alternative request and an indication of the impacts of those amendments or effects; and
- where possible, an indication of the impact of the proposed alternative request on relevant computer systems and processes.

How do Alternative Requests become formal Workgroup Alternative Modifications? The Workgroup will carry out a Vote on Alternatives Requests. If the majority of the Workgroup members or the Workgroup Chair believe the Alternative Request will better facilitate the Applicable Objectives than the current proposed solution(s), the Workgroup will develop it as a Workgroup Alternative Modification.

Who develops the legal text for Workgroup Alternative Modifications? ESO will assist Proposers and Workgroups with the production of draft legal text once a clear solution has been developed to support discussion and understanding of the Workgroup Alternative Modifications.

Can I vote? And What is the Alternative Vote?

To participate in any votes, Workgroup members need to have attended at least 50% of meetings. The vote shall be decided by simple majority of those present at the meeting at which the vote takes place (whether in person or by teams)

Stage 1 – Alternative Vote

- Vote on whether Workgroup Alternative Requests should become Workgroup Alternative CUSC Modifications.
- The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.
- Should **the majority of the Workgroup OR the Chair** believe that the potential alternative solution may better facilitate the CUSC objectives than the Original then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative CUSC modification (WACM) and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.

Can I vote? And What is the Alternative Vote?

To participate in any votes, Workgroup members need to have attended at least 50% of meetings. The vote shall be decided by simple majority of those present at the meeting at which the vote takes place (whether in person or by Teams)

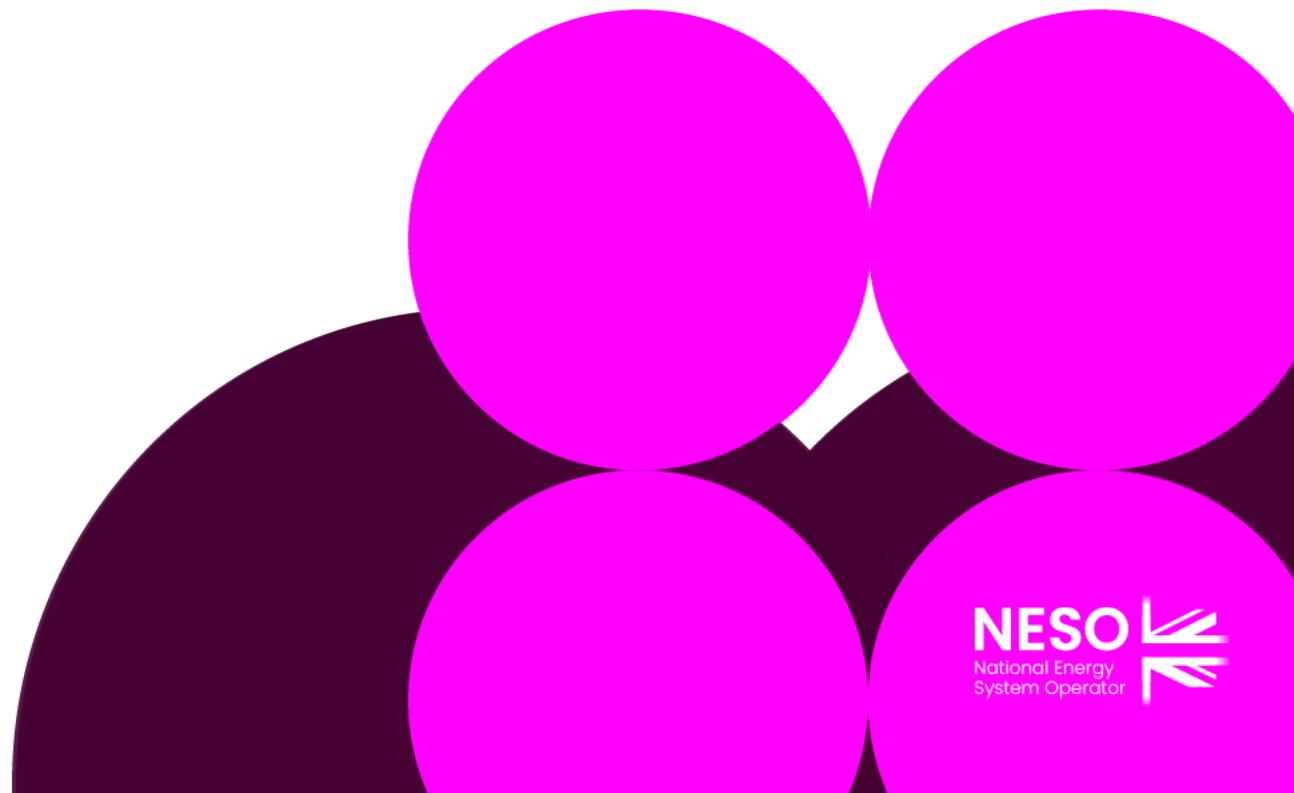
Stage 2 – Workgroup Vote

- 2a) Assess the original and Workgroup Alternative (if there are any) against the relevant Applicable Objectives compared to the baseline (the current code)
- 2b) Vote on which of the options is best.

Alternate Requests cannot be raised after the Stage 2 – Workgroup Vote

Objectives and Timeline

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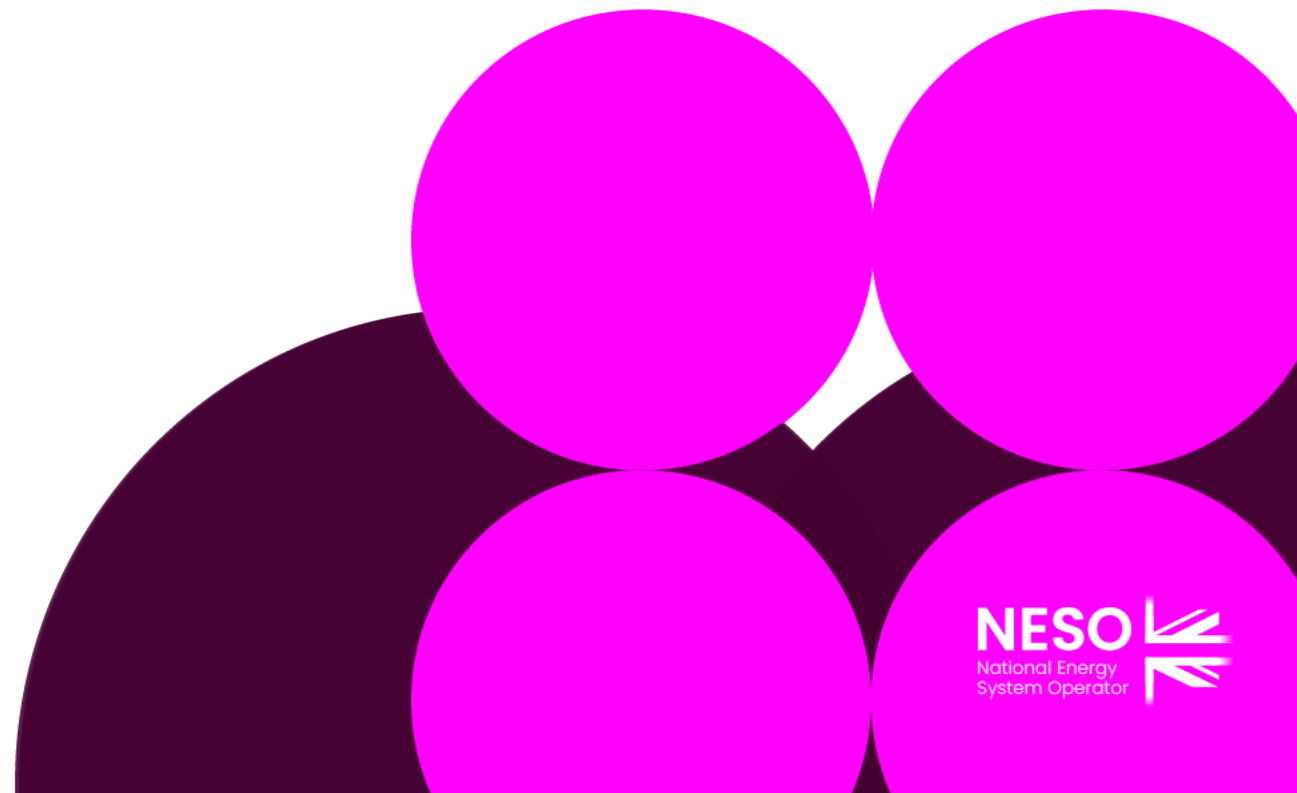


Timeline for CMP446 on 22 January 2025

Workgroups		High Level Objectives
CMP446 Workgroup Meeting 1	24/01/2025	Full solution and ToR assessment
CMP446 Workgroup Meeting 2	30/01/2025	Any Alternative requests suggestion/ Review of Workgroup Consultation
CMP446 Workgroup Meeting 3	03/02/2025	Review of Workgroup Consultation / Contingency
CMP446 Workgroup Consultation	07/02/2025 - 13/02/2025	
CMP446 Workgroup Meeting 4	19/02/2025	Workgroup Consultation feedback and any Alternative votes
CMP446 Workgroup Meeting 5	24/02/2025	Finalise legal text and ToR Confirmation, Workgroup Vote
CMP446 Workgroup Meeting 6	26/02/2025	ToR confirmation and Workgroup Vote/ Contingency
CMP446 Workgroup Report to Panel	05/03/2025	
CMP446 Panel for ToR sign off	10/03/2025	
Post Workgroups		
CMP446 Code Administrator Consultation	10/03/2025 - 17/03/2025	
CMP446 Draft Final Modification Report to Panel	24/03/2025	
CMP446 Panel Recommendation Vote	28/03/2025	
CMP446 Final Modification Report to Panel to check Votes	28/03/2025	
CMP446 Final Modification to Ofgem	28/03/2025	
CMP446 Decision Date	01/04/2025	
CMP446 Implementation Date	02/05/2025	

Review Terms of Reference

Milly Lewis – NESO Code Administrator



Terms of Reference

Workgroup Term of Reference

- a) Consider EBR implications
- b) Consider the scope of work identified and whether this is achievable within the timeframe outlined in the Ofgem Urgency decision letter.
- c) Consider the legal and practical implementation of this modification alongside CMP434/CMP435 and any other relevant in flight CUSC modifications.
- d) Consider any cross-code impacts.
- e) Consider data and any other requirements from DNOs to implement
- f) Consider how CMP446 would be compatible with the requirement for the NESO acting in a non-discriminatory manner
- g) Consider how CMP446 would be compatible with the requirement for harmonised rules for generator connections in GB.
- h) Consider what the MW capacity relates to: for example, export capacity or installed capacity or developer capacity?
- i) Consider if the change applies only to new projects (up to 5MW) or also to existing D connected projects that increase their capacity by up to 5MW (say from 4MW to 6MW), and projects that reduce to be below the threshold.
- j) Consider any legal text interactions with CMP434 and CMP435.
- k) Consider potential for interlinked impact of cumulative/aggregated <5MW projects which would otherwise breach the proposed 5MW threshold.
- l) Consider the interaction with Technical (Planning) limits and Distribution (DNO) managed Active Network Management (ANM) schemes

Proposal Overview

Martin Cahill - NESO

1. Discuss the defect and proposed solution
 2. Terms of Reference – included initial views on each point, identify any changes or ToRs which will need more detail/clarity before Workgroup Consultation
 3. Discuss proposed timescales for implementation
 4. Review draft legal text
 5. Discuss all feedback reviewed so far and any additional areas
- *WG2 will cover actions identified from this workgroup and any alternatives/suggestions for the solution. We will also aim to get workgroup consultation ready to go out.*
 - *WG3 will be used as a contingency workgroup and/or to finalise the workgroup consultation*

Terms of Reference

Workgroup Term of Reference	Location in Workgroup 1 slides
Consider EBR implications	
Consider the scope of work identified and whether this is achievable within the timeframe outlined in the Ofgem Urgency decision letter.	WG Timeline slide and revisit at end of WG1
Consider the legal and practical implementation of this modification alongside CMP434/CMP435 and any other relevant in flight CUSC modifications.	Current CUSC and proposed legal text
Consider any cross-code impacts.	Current CUSC and proposed legal text
Consider data and any other requirements from DNOs to implement	Timescales/implementation
Consider how CMP446 would be compatible with the requirement for the NESO acting in a non-discriminatory manner	Feedback so far and additional considerations
Consider how CMP446 would be compatible with the requirement for harmonised rules for generator connections in GB.	Feedback so far and additional considerations
Consider what the MW capacity relates to: for example, export capacity or installed capacity or developer capacity?	Feedback so far and additional considerations
Consider if the change applies only to new projects (up to 5MW) or also to existing D connected projects that increase their capacity by up to 5MW (say from 4MW to 6MW), and projects that reduce to be below the threshold.	Feedback so far and additional considerations
Consider any legal text interactions with CMP434 and CMP435.	Current CUSC and proposed legal text
Consider potential for interlinked impact of cumulative/aggregated <5MW projects which would otherwise breach the proposed 5MW threshold.	Feedback so far and additional considerations
Consider the interaction with Technical (Planning) limits and Distribution (DNO) managed Active Network Management (ANM) schemes	Feedback so far and additional considerations

Background

Connections Action Plan (CAP), published in November 2023 under 3.5b requested networks to “assess and review the thresholds for Transmission Impact Assessments (TIA)s; to accelerate connection timescales for distribution customers”. A subsequent review conducted by the 3 on-shore TOs, has proposed the following for Evaluation of Transmission Impact Assessments:

Scotland, South –SPT & SPD. Review concluded that the current lower threshold of 200kW strikes the right balance between accelerating connections ahead of Transmission Reinforcements.

Outcome – No change proposed to existing lower threshold in Scotland, South.

Scotland, North – SSEN Transmission & SSEN Distribution across the north of Scotland transmission area. The review has concluded that the threshold can be raised to 200kW for all of mainland GSPs in the SSEN Transmission network. This change has since been implemented*. The islands off North Scotland remain at 50kW

Outcome: No additional change proposed to existing lower threshold in Scotland, North

England & Wales (E&W) – Analysis carried out by NGET supported an increase in the lower threshold to at least 5MW.

Outcome: Increase the threshold for which projects require a TIA in E&W from 1MW to 5MW and to codify the limit as the CUSC currently references a 1MW limit for an Appendix G in England and Wales.

NGET are unable to raise a CUSC mod for this change; NESO will act as the proposer on their behalf.

* [SSEN Transmission subsequently increased the threshold at which new projects will require a TIA](#)

Background

- Original 1MW threshold for Distributed Generators has been in place since 2016; the assumptions that are now being used to assess the impact on the Transmission network have changed significantly with greater confidence and experience in trends and attrition rates has been gained in terms of accepted and connected projects.
- Various thresholds were assessed.
- Subsequently both NGET and NESO support increasing the lower threshold from 1MW to 5MW for E&W DG. This would mean that DG projects in E&W between would sit outside the TIA process which would likely allow them to connect earlier as they would no longer be linked to transmission system reinforcement.
- This would improve the efficiency of the Evaluation of Transmission Impact Assessment process by focusing on the projects that have the bigger transmission impact. It would also improve the customer experience as these smaller projects would no longer have to go through the process or wait for an assessment to conclude
- This would mean these projects do not have the risk associated with transmission network build delaying their connection date and adding cost.

Background Slide (2)

Issue

Current Situation: The volume of connection applications to the Transmission Network has grown approximately tenfold over the last five years.

Problem: Distribution connections are increasingly dependent on Transmission reinforcements, causing significant delays and risks for project developers and investors.

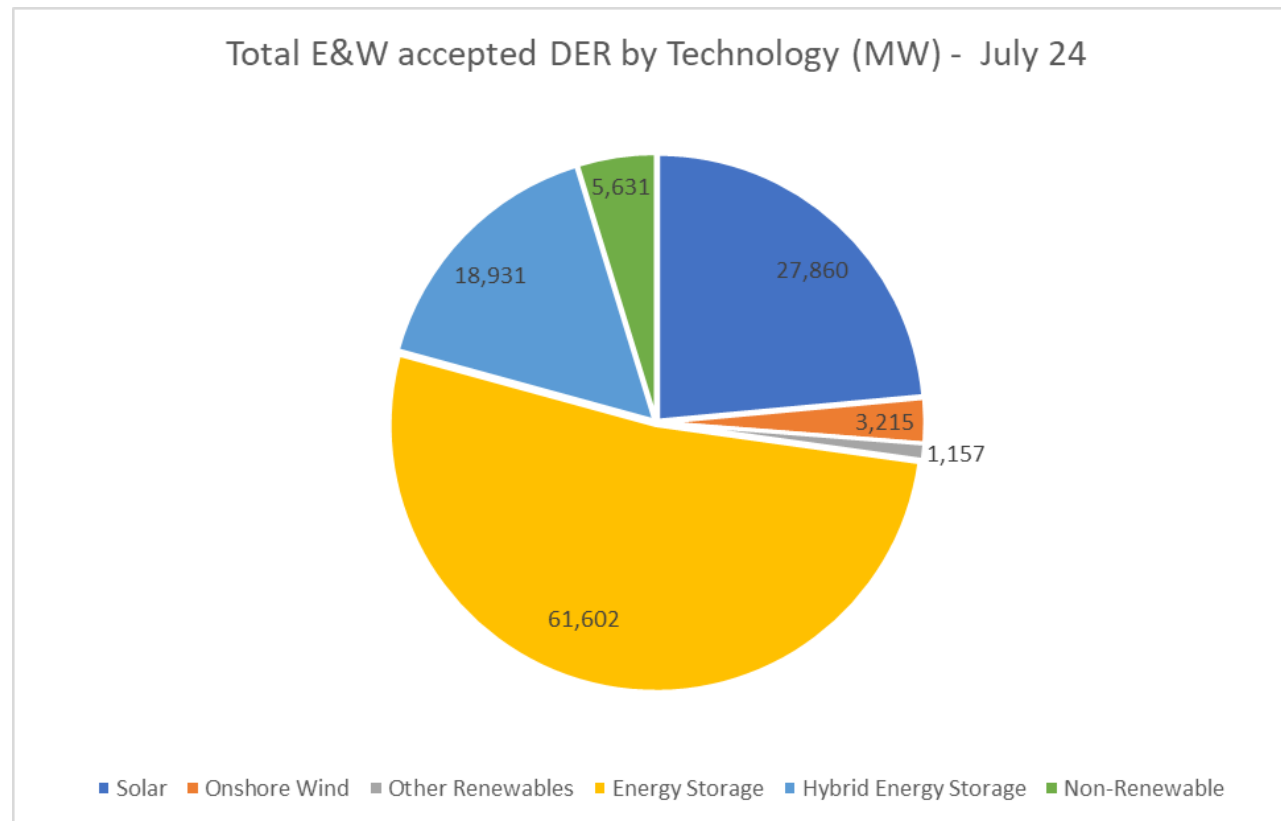
When analysis was taken at its current state, it was identified that 390 current projects sit within the 1MW > 5MW threshold.

Analysis for England & Wales –
1MW > 5MW Appendix G

App G	All not yet connected DER between 1MW and < 5MW	How many MWs?
NGED	103	232.2
UKPN	114	265.7
SPM	2	6
ENWL	67	120
NPG	67	136.4
SSEN	37	92.1
Total	390	852.5

Background Slide (3)

Further to the previous slide, this shows that as of July 2024 there were circa 137GW of accepted demand connections and DER (inclusive of 118GW generation) across England and Wales, accounting for 5787 individual customers



Consistency Across GB Networks

- The relative size of GSPs is reflective of the voltage boundary between Transmission and Distribution, but also takes into consideration differences in the relative demand requirements at the load centres in Scotland (compared to England and Wales) and reflects the requirements for the TOs to plan, develop and maintain an efficient, coordinated and economical system of electricity transmission.
- Constructing assets that were nominally oversized for the demand that they were required to supply would be regarded as uneconomic and inefficient – and therefore not in the best interests of customers who ultimately would have to bear the costs of this investment.
- The Position Paper on TIA thresholds working group therefore concluded that the lower limit TIA across the 3 TOs should not be the same.
- [Section 6 of the Position Paper](#) on TIA thresholds provides the rationale for why the lower limit TIA across the 3 TOs should remain different.

Summary - Defect

- If the Evaluation of Transmission Impact threshold is not urgently addressed, this may cause a significant commercial impact on projects between 1MW and 5MW in England and Wales. Projects would potentially miss out on significant acceleration of timelines which would likely result from not being subject to the cost and timelines associated with transmission assessment and/or reinforcement. This impacts on 850MW (~400 projects) of generation currently, plus any future projects between 1 and 5MW in England and Wales.
- While the limit is not strictly codified in the main CUSC, there is already some precedent in England & Wales as the 1MW limit is referred to in a CUSC appendix where it says anything above will be deemed to have an impact on the transmission system. There is currently nothing within the Appendix G template to include the Scottish limits
- There is a clear need as part of this modification to meet some extremely tight timescales and therefore we have focussed the defect on where we believe there is scope to make an improvement for generators in England & Wales
- Scottish TOs have been very clear they do not wish the Scotland limit to be codified, whilst understanding that they are not CUSC parties

Mod Proposal / Solution

Proposal: Raise the lower threshold for TIA from 1MW to 5MW in England and Wales by adding a new paragraph at the end of CUSC 6.5.1* which codifies this limit. This would also need to be reflected in CUSC Schedule 2 Exhibit 1A & Appendix G and the individual DNO/NESO BCAs.

Impact for England and Wales:

- This would allow faster progression of distribution applications without waiting for TIA, being impacted by transmission costs and reducing the risk of transmission works delaying connection dates.
- Reduces the number of TIA applications the DNOs, NESO and NGET will need to process, allowing them to focus on projects that are needed and ready.
- Allows community-based project to connect to the system and reduce the financial burden on these projects.
- Allows commercial premises installing roof top solar, typically to reduce their demand, to progress more quickly.

Evaluation of Transmission Impact – CUSC baseline today*

6.5.1 (e) – The **User** may request that the **Evaluation of Transmission Impact** is undertaken by **The Company** using one of the following options:

i. Statement of Works and Confirmation of Project Progression

- As documented in paragraph 6.5.5

ii. Transmission Impact Assessment

- As documented in paragraph 6.5.8

iii. Any other published process as agreed between **The Company** and the **User** following written approval from the **Authority** and consultation with such persons who may be considered to have an appropriate interest

*latest [CUSC - SECTION 6](#)

Definitions

Evaluation of Transmission Impact

The process undertaken by The Company to understand the effect of a *Relevant Embedded Power Station* on the National Electricity Transmission System

Relevant Embedded Power Station

an *Embedded Medium Power Station* which is an Exempt Power Station, and does not intend to be the subject of a Bilateral Agreement;

an *Embedded Small Power Station* that the User who owns or operates the Distribution System to which the Embedded Small Power Station intends to connect reasonably believes may have a significant system effect on the National Electricity Transmission System

N.B – Appendix G then refers back to threshold:

3. For the purposes of the Evaluation of Transmission Impact and unless otherwise indicated by The Company under CUSC 6.5.1(b), Embedded Power Stations of 1MW and above will be deemed to have an impact on the National Electricity Transmission System and must be included in Appendix G Schedule 1.

Evaluation of Transmission Impact – CMP434 legal text amends*

6.5.1 (e) – The **User** shall request that the **Evaluation of Transmission Impact** is undertaken by **The Company** using one of the following options;

i. Transmission Evaluation Application

- As documented in paragraph 6.5.5

ii. Transmission Impact Assessment (establishing “Appendix G”)

- As documented in paragraph 6.5.8

WACM1 and WACM 2 under CMP434 make the same amends to 6.5.1 (e) as NESO’s original proposal. CMP434 WACM1 introduces specific MW sizes under categories to legal text, if taken forward this modification may have to amend this text to reference <5MW generators in E&W being exempt from this process

Consider any legal text interactions with CMP434 and CMP435.

Proposed Legal text

- Will bring specific text into CUSC 6.5.1 as a new paragraph as 6.5.1(f), but also acknowledging 6.5.1 (b)

considered to have an appropriate interest.

(f) In England and Wales, it is agreed that only an **Embedded Small Power Station** which is 5MW or above is a **Relevant Embedded Power Station** requiring the submission of an **Evaluation of Transmission Impact** to **The Company** in accordance with Paragraph 5.1(a) above.

- Schedule 2 Exhibit 1A BCA Agreement

[]2 For the purposes of **CUSC** Paragraph 6.5.1(b), **Embedded Small Power Stations** of []MW **[Footnote –in England and Wales this is 5MW]** and above will be deemed to be a **Relevant Embedded Small Power Station** unless otherwise notified by The Company in accordance with CUSC Paragraph 6.5.1(b).

- Will also address in Appendix G

- For the purposes of the **Evaluation of Transmission Impact** and unless otherwise indicated by **The Company** under **CUSC** 6.5.1(b), **in England and Wales Embedded Power Stations** of 45MW and above will be deemed to have an impact on the **National Electricity Transmission System** and must be included in Appendix G Schedule 1.

Proposed Legal text (Continued)

- Text in 6.5.1(b) (unchanged)
 - (b) Should the **User** be uncertain as to whether an **Embedded Power Station** (either singularly or as part of a group) has a significant impact on the **NETS** and should be classed as a **Relevant Embedded Power Station**, the **User** shall submit a request to **The Company** for an **Evaluation of Transmission Impact** on behalf of the **Embedded Power Station** as per Paragraph 6.5.1(c). For avoidance of doubt, such significant impact will be deemed if the **Embedded Power Station** involves an **Active Power, Apparent Power, Reactive Power**, kiloamp or kilovolt value larger than as advised by **The Company** to the **User**.
- Separate paragraph will avoid any clashes with legal text for CMP434, though will need to be mindful of WACM1 which introduces some limits

Consider the legal and practical implementation of this modification alongside CMP434/CMP435 and any other relevant in flight CUSC modifications.

Consider any cross-code impacts.

Other code modification interactions

[GC0117](#): Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Station requirements

Status: Awaiting a decision from the Authority

Proposer's solution: For future Power Stations across GB is to define Large Power Station as 10MW and above and Small Power Stations as <10MW.

- Doesn't interact with CMP446

WAGCM1: The Power Station thresholds of Small (less than 50MW), Medium (50-<100MW) and Large (100MW or greater) that currently apply in E&W would also be applied in Scotland.

- Would need to consider the impact to the lower TIA in Scotland

Recommendation: Wait for the Authority decision as can't assume what will be approved.

[GC0139](#): Enhanced Planning-Data Exchange to Facilitate Whole System Planning

Status: Workgroup Consultation closed 21 January

Proposer's solution: An enhanced level of planning data exchanged between Network Operators and NESO; the data exchanged will largely be in the Common Information Model (CIM) format, supplemented by data in an Excel Workbook format. Data exchanges will take place twice a year for both the NESO and Network Operators.

- Don't believe any impact on this mod.

Recommendation: Continue with this modification as planned.

How BEGA process will work for projects under 5MW in E&W

To be updated for Workgroup Meeting 2

1. EG submits BEGA application to NESO – at any point in the year
2. NESO notify the DNO of BEGA application (via modification notice)
3. DNO submits **Modification Application (Exhibit I)** to NESO (so for clarity not via Project Progression in today's world or via Transmission Evaluation Application under CMP434)
4. Modification Application is not via the gated process
5. Technical data submitted by DNO as part of Modification Application submission
6. Contracts issues to customer and DNO

TEC register as of 21 January has no EG projects listed requesting a BEGA <5MW threshold in England and Wales.

Consider the interaction with Technical (Planning) limits and Distribution (DNO) managed Active Network Management (ANM) schemes

Due to how the formula of Technical Limits is created, increasing the lower threshold could have an impact on the Technical Limits. This means that the limits could be slightly lower going forward.

Currently, DNOs are reviewing this, and initial feedback back is only slightly reducing the limit.

Consider the interaction with Technical (Planning) limits and Distribution (DNO) managed Active Network Management (ANM) schemes

Implementation

To be updated for Workgroup Meeting 2

Authority decision
period of around a
month



Ofgem decision
required a few weeks
before for
implementation



Gate 2 Window opens
D0



Gate 2 window closes

Need to consider whether 1-5
Generators are considered 'in
existing agreements for
CMP434/CMP435 implementation)

We expect decisions on CMP446
and CMP434/435 to be made at
similar times – one could come
slightly before the other

BCAs updated to remove from
Appendix Gs after Gate 2 window close
(and alongside removal of projects that
haven't met Gate 2 criteria

- **Implementation Date:** The proposal aims to be implemented before the Gate 2 submission window for CMP435 (Gate 2 to whole queue). This will allow projects to understand if they need to apply or not to participant in that process.

- If agreed within the urgency timeframe, contractual changes would happen within the proposed CMP435 timeframes.

DNO Data/Requirements in England and Wales

- DNOs to provide as part of **Appendix G updates / Gate 2 applications**, the amount of MWs under the 5 MWs threshold, broken down into technology to ensure all background assumptions are correct.
- Note – Not all sites have Appendix G so do all sites that have generation now require an Appendix G?
- Or does it belong within the Technical data which supports Gate 2 Application

Consider data and any other requirements from DNOs to implement

Feedback from TCMF and Panel

1. Codifying the threshold for Scotland Generation

There were mixed views on this – a question was raised about whether this modification should look to codify the threshold for Scotland, even if the threshold would not change from what is applied in practice.

The primary defect is in England and Wales where NGET are able to accommodate a higher threshold, with the reviews in Scotland not proposing any changes. A separate modification in the future could potentially codify/change the Scottish threshold if needed.

2. Increases to TEC

There was a question about whether a generator looking to increase their TEC would have their threshold applied on the increase relative to their existing TEC, or the total TEC after increase.

This detail will be confirmed during workgroups, but our current working assumption is that the thresholds will only be applied on total TEC – so a generator increasing from 4 to 6MW would need to go through the Evaluation of Transmission Impact assessment process.

3. Capacity Value

Question as to what value will be used – e.g. installed capacity vs TEC

Proposal is to use Developed Capacity (defined term in CUSC)

4. Clean Power 2030

Question was around would still impact the CP30 buckets for Distribution.

Our current view is that this would mean projects under 5MWs wouldn't be part of the CP30 buckets due to them not applying to the primary process with NESO. This would mean the buckets increase, by the latest analysis of 850MW.

5. DNOs

How have they been involved? Are they resourced to do this?

DNOs have been involved through ENA working groups, no concerns have been raised about resourceability to date

6. Aggregate impact

Consideration of the impact of lots of smaller generators when aggregated

Consider what the MW capacity relates to

- Proposal is for the threshold to be based on ‘developer capacity’
- Will be based on overall capacity figure rather than based on an increase – e.g. a 4MW generator increasing to 6MW would have to go through Evaluation of Transmission Impact process

“Developer Capacity”

the MW figure as specified as such by a **User** in a **BELLA** or in a **Construction Agreement** entered into between **The Company** and a **User** in the category of a **Distribution System** directly connected to the **National Electricity Transmission System** as a consequence of a **Request for a Statement of Works**;

Consider what the MW capacity relates to: for example, export capacity or installed capacity or developer capacity?

Consider if the change applies only to new projects (up to 5MW) or also to existing D connected projects that increase their capacity by up to 5MW (say from 4MW to 6MW), and projects that reduce to be below the threshold.

Ensuring fairness

- **Scotland Limit**

Proposal is not to codify in Scotland because there is a clear defect in England and Wales where the limit can be increased

Difference in limits outlined by TOs in paper

- **Connected vs new sites**

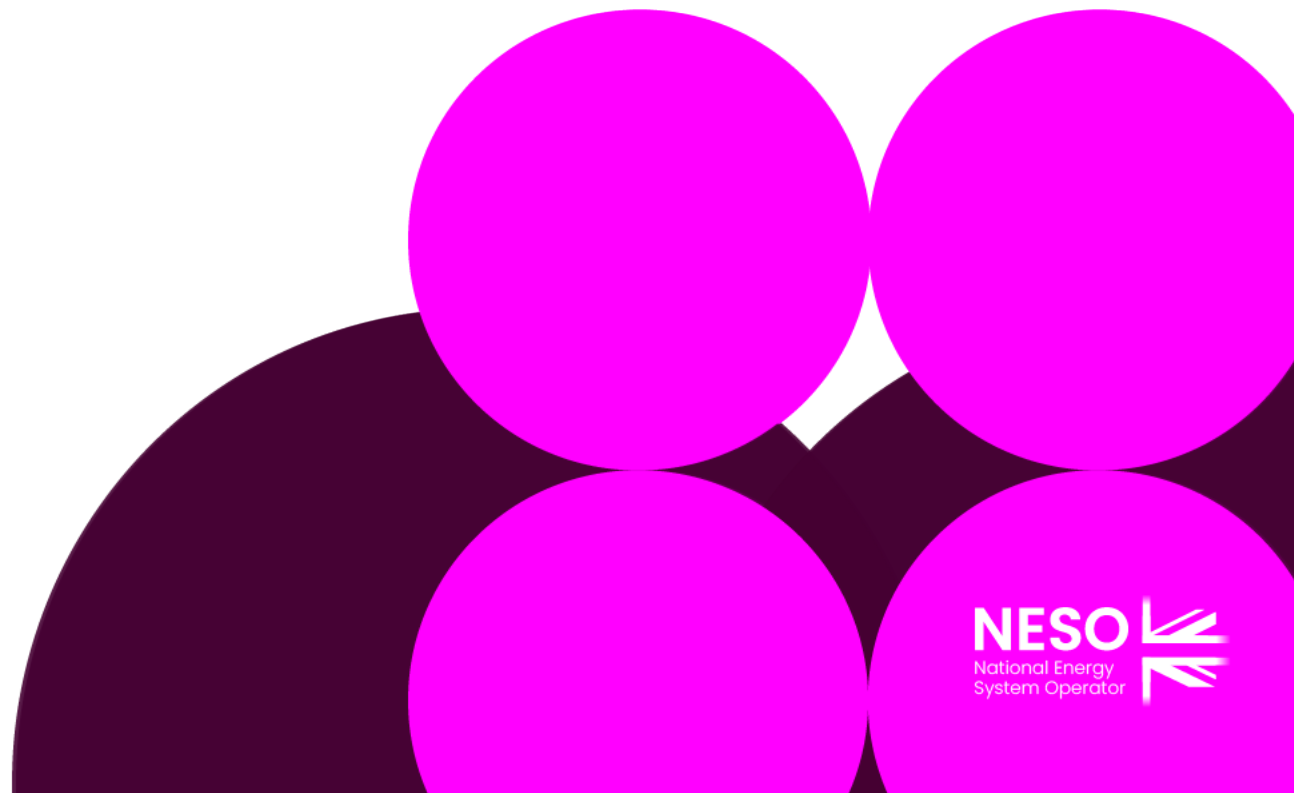
Applying retrospectively to existing sites would add a lot of complexity to the solution and would risk delivering to the planned timeline

Consider how CMP446 would be compatible with the requirement for the NESO acting in a non-discriminatory manner

Consider how CMP446 would be compatible with the requirement for harmonised rules for generator connections in GB.

Agree Terms of Reference

Milly Lewis – NESO Code Administrator



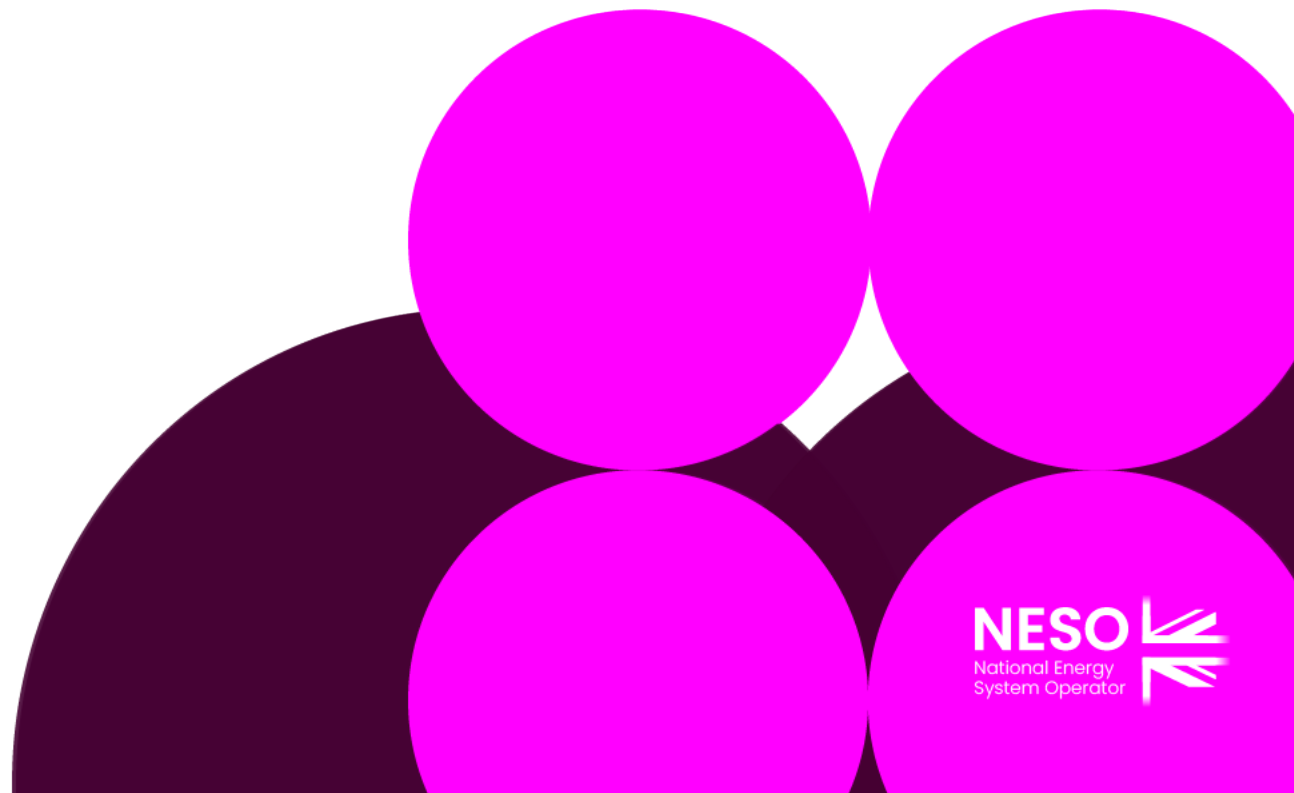
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- k) Consider potential for interlinked impact of cumulative/aggregated <5MW projects which would otherwise breach the proposed 5MW threshold.
- l) Consider the interaction with Technical (Planning) limits and Distribution (DNO) managed Active Network Management (ANM) schemes

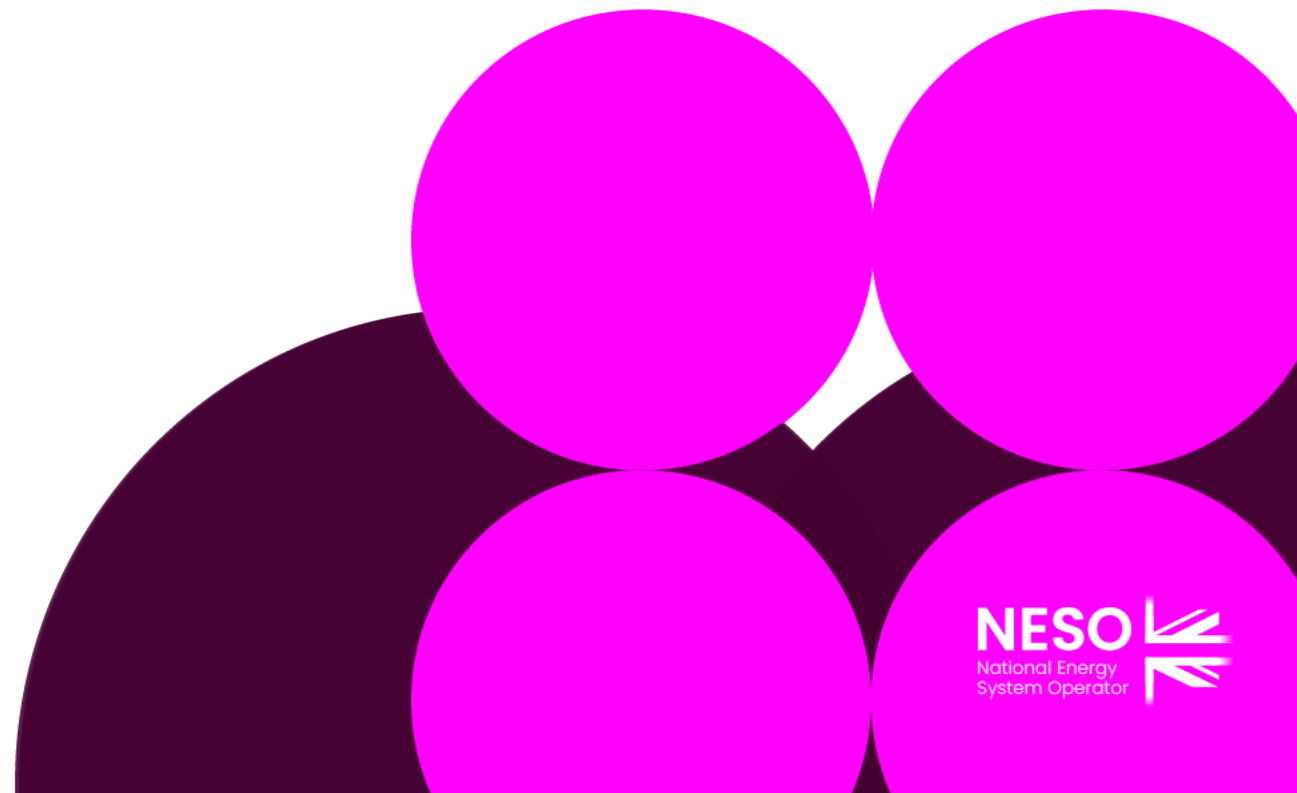
Cross Code Impacts

Milly Lewis – NESO Code Administrator



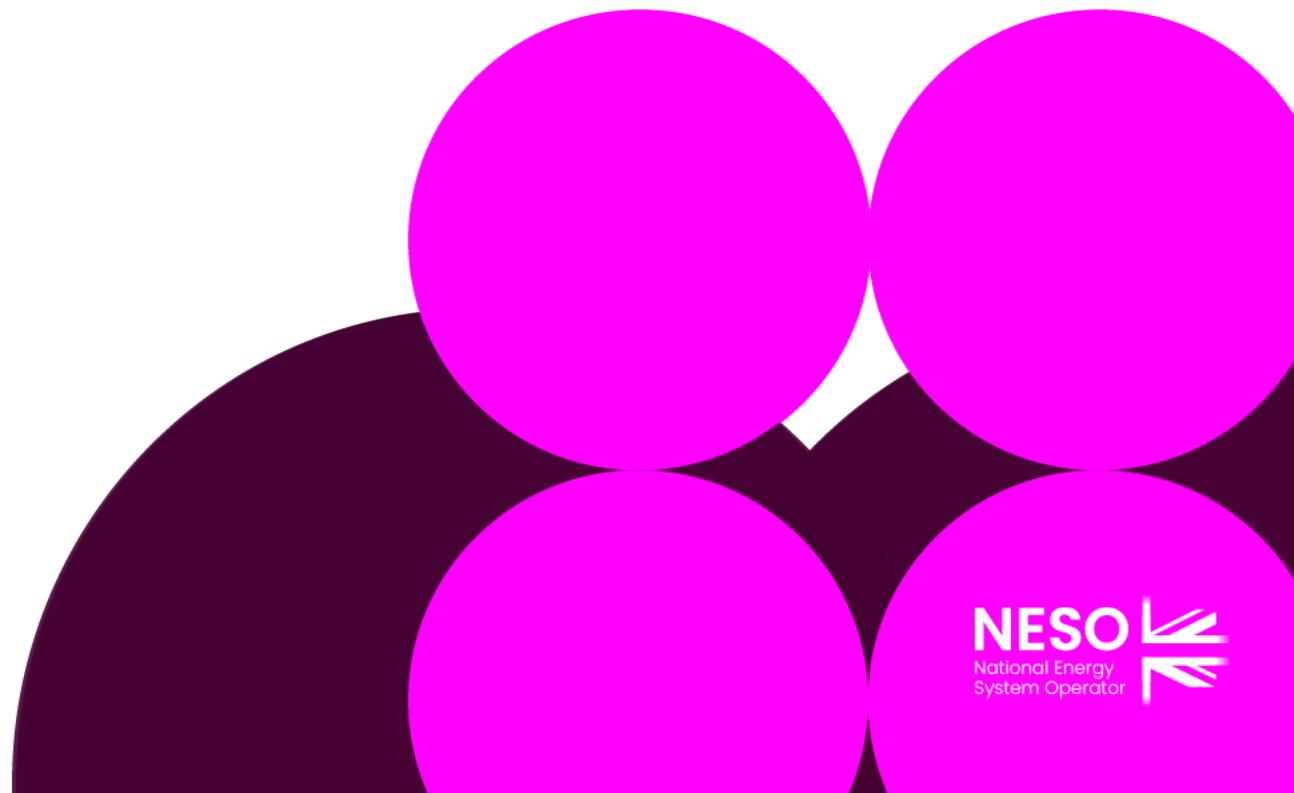
Any Other Business

Milly Lewis – NESO Code Administrator



Next Steps

Milly Lewis – NESO Code Administrator



Timeline for CMP446 on 22 January 2025

Workgroups		High Level Objectives
CMP446 Workgroup Meeting 1	24/01/2025	Full solution and ToR assessment
CMP446 Workgroup Meeting 2	30/01/2025	Any Alternative requests suggestion/ Review of Workgroup Consultation
CMP446 Workgroup Meeting 3	03/02/2025	Review of Workgroup Consultation / Contingency
CMP446 Workgroup Consultation	07/02/2025 - 13/02/2025	
CMP446 Workgroup Meeting 4	19/02/2025	Workgroup Consultation feedback and any Alternative votes
CMP446 Workgroup Meeting 5	24/02/2025	Finalise legal text and ToR Confirmation, Workgroup Vote
CMP446 Workgroup Meeting 6	26/02/2025	ToR confirmation and Workgroup Vote/ Contingency
CMP446 Workgroup Report to Panel	05/03/2025	
CMP446 Panel for ToR sign off	10/03/2025	
Post Workgroups		
CMP446 Code Administrator Consultation	10/03/2025 - 17/03/2025	
CMP446 Draft Final Modification Report to Panel	24/03/2025	
CMP446 Panel Recommendation Vote	28/03/2025	
CMP446 Final Modification Report to Panel to check Votes	28/03/2025	
CMP446 Final Modification to Ofgem	28/03/2025	
CMP446 Decision Date	01/04/2025	
CMP446 Implementation Date	02/05/2025	

SWOT Analysis

Strengths (Positives of increase)	Weakness (Negatives of increase)
Will provide DNOs with the opportunity to accelerate the connection of up to 390 DER that are less than 5MW across England and Wales.	An increase to 5MW would adversely impact on the ability of NGET to model the aggregate impact on NGET's network.
A total of 852.5MW of DER across all DNOs, in England and Wales, will be able to connect without having to go through a Transmission Impact Assessment.	Pending a minded to position from Ofgem on GC117 and the impact this will have on the TIA process, increasing the lower threshold would potentially capture less DER customers and become surpassed by a separate process for >10MW DER – subject to a WCAM.
Reduction in the amount of time it takes DER under 5MW to receive an Offer from Distribution and to get connected because they are not subject to a TIA assessment and therefore transmission reinforcement works are not required to be complete before they can connect.	Could potentially result in an increase in constraint costs due to NESO having to curtail directly connected customers.
Helps enable the government's 2030 target (Clean Power 2030) – First ready and needed, first connected.	Would require an additional change to the CUSC via a separate modification.
Reduces the number of TIA applications the DNOs, NESO and NGET will need to process.	The risk of a DER that requires a Substation Control System (SCS) database change being missed.
Allows community-based project to connect to the system and reduce the financial burden on these projects.	This could result in an increase in costs based onto DER that go through the TIA process.
Allows commercial premises installing roof top solar, typically to reduce their demand, to progress more quickly.	While Connections Reform is looking to increase the barrier for entry, this removes barriers for a specific set of customers.
	This could increase the number of applications for DER projects that are <5MW compared to what we currently receive.

SWOT Analysis (2)

Opportunities (Advantages of allowing the increase)	Threats (Negatives of not increasing)
Provides time to assess the full impact of the other industry initiatives i.e., GSP Technical Limits, Reallocation of Capacity and Connection Reform.	390 DER that are less than 5MW across England and Wales will not be able to accelerate and contribute a total of 852.5MW towards CP30.
Reduces the risk of creating contractual confusion by implementing several different changes at the same time.	Revising the lower TIA threshold could result in an influx of connections <5MW or some developers opting to apply for <5MW connections followed by increases in capacity as part of a later application.
Visibility of applications <5MW applying can be tracked through the Appendix G through a cumulative running total.	Could result in additional works being required for DER 5MW+ if DER <5MW is included in the TIA and their volumes become substantial.
Visibility of applications <5MW connecting to Distribution can be tracked through the Week 24 submission process.	