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Workgroup Consultation Response Proforma

CMP446: Increasing the lower threshold in England and Wales for Evaluation of Transmission Impact Assessment (TIA)

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** on **13 February 2025**. 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 milly.lewis@nationalenergyso.com or cusc.team@nationalenergyso.com

Respondent details	Please enter your details	
Respondent name:	Gethyn Howard	
Company name:	Aggreko Energy Solutions Europe	
Email address:	Gethyn.Howard@aggreko.com	
Phone number:	07779871775	
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 Workgroup, 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 by this 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.*

* See Electricity System Operator Licence

**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 Workgroup Consultation questions												
1	Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?	<div>Mark the Objectives which you believe each solution better facilitates:</div> <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/> A</td> <td><input type="checkbox"/> B</td> <td><input type="checkbox"/> C</td> <td><input checked="" type="checkbox"/> D</td> </tr> <tr> <td>Alternative Request 1</td> <td><input checked="" type="checkbox"/> A</td> <td><input checked="" type="checkbox"/> B</td> <td><input type="checkbox"/> C</td> <td><input checked="" type="checkbox"/> D</td> </tr> </table> <div>Click or tap here to enter text.</div>	Original	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D	Alternative Request 1	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
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Alternative Request 1	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D								
2	Do you support the proposed implementation approach?	<div><input checked="" type="checkbox"/> Yes</div> <div><input type="checkbox"/> No</div> <div>See supplementary commentary in question 9</div>										
3	Do you have any other comments?	See response to question 9										
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<div><input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section)</div> <div><input checked="" type="checkbox"/> No</div> <div>Click or tap here to enter text.</div>										

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5	Does the draft legal text satisfy the intent of the modification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes though as per our response to question 9, the legal text regarding the 5MW threshold and how this is linked to the D.Code would need amending.
6	Do you agree with the Workgroup's assessment that the modification does not impact the European Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.

Specific Workgroup Consultation questions

7	Do you believe that a codification of Scotland threshold is required for CMP446?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No From a consistency perspective it would seem sensible to mirror the inclusion of a threshold as is being developed for England and Wales under this proposal. However, given the urgency and scope of this proposal, we would recommend any subsequent review and proposal covering Scotland is developed and raised separately to CMP446.
8	Is it clear that the change in threshold is cumulative not incremental?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No It is but is also unclear whether this could potentially be circumvented through splitting up connection points at a generation development and treating as multiple separate embedded generators. We note for example the CfD scheme would view these as separate sites so consideration should be given as to how this would be treated from a consistency perspective.

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9	Do you believe 5MW is the correct threshold and if not why and to what threshold level should it be? (Providing rationale and justification for any alternative MW threshold)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (see notes) We are supportive of the increase but would suggest aligning the threshold with the CfD threshold for consistency. Given the approach taken using one decimal place, we would propose setting the TIA threshold to ensure projects greater than 5MW (i.e. 5.01MW) are captured meaning a threshold of 5.06MW.
10	Are there any other generic scenarios (over and above those shown in Figure 2 and Figure 3 (Annex 7) that need to be considered by the Workgroup, please provide details of them and explain why they are relevant?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.
11	It is intended that where there is a fault level headroom that is less than 1kA or zero as stated by NGET at a GSP, then a project is required to go through the TIA irrespective of the change in threshold (from 1MW to 5MW) – do you agree with this and if not, why?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
12	Do you agree that the Workgroup has identified the relevant risks if CMP446 is approved. If not, what further risks haven't been identified yet, and why are they relevant?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
13	Do you believe that as consequence of CMP446 there will be an increase in <5MW projects which is	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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	likely to have an impact on the Transmission Network? If so, what kind of projects could drive this?	<p>Many developers will be seeking to progress any connections to the grid given the pressures of CP30 and associated connection queues and this poses the risk of any small advantage being exploited to its fullest. It will need to be made clear that when applying for smaller connections this process will not provide an advantage to the connection queue position.</p> <p>As part of this, consideration should be given as to whether the threshold should be aligned to allow the smallest of CfD eligible projects to enter this process or whether the proposed threshold acts as a natural disincentive to try to take advantage of the TIA amendments.</p>
14	Do you have any suggestions for any additional mitigation measures for the identified risk?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
15	Do you understand that as a consequence of CMP446 that the curtailment assumptions for an accepted Technical Limits offer could be impacted?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
16	Is the timeline of interactions understood?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
17	Do you believe it is appropriate/ within scope of CMP446 for the Workgroup	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>

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	to consider this further, and if so why?	Click or tap here to enter text.
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