

Public

## 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](mailto: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](mailto:milly.lewis@nationalenergyso.com) or [cusc.team@nationalenergyso.com](mailto:cusc.team@nationalenergyso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Joe Hulyer	
<b>Company name:</b>	Renewable Connections Developments Limited	
<b>Email address:</b>	j.hulyer@renewableconnections.co.uk	
<b>Phone number:</b>	07425 824343	
<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 checked="" 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)

Public

**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?	Mark the Objectives which you believe each solution better facilitates:
		Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		Alternative Request 1 <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		The alternative proposal offers far greater flexibility and will allow large industrial sites the ability to oversize generation to help them meet clean energy targets and offer greater flexibility to the grid. I believe it would be beneficial for the industry to look into fault level limitation technology as this along with export limitation devices to ensure that behind the meter generation only benefits the network.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No
		Based on Annex 4, it appears that the 5MW threshold has been arrived at using high level statistical analysis. While I believe this to be a huge positive, it would be helpful to have more clarity around the fringe sites that sit either above or below this threshold will be managed.
3	Do you have any other comments?	Overall the proposal is positive and will significantly help a large number of industrial customers looking for behind the meter generation applications to positively contribution towards net zero

## Public

		goals. However, I have proposed a number of potential control measures below as larger industrial sites that are the largest carbon emitters in the country, with the largest impact on the distribution and transmission networks are unlikely to be able to install meter side generation for the purpose of onsite consumption.
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.
5	Does the draft legal text satisfy the intent of the modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No While I think the intent is clear in that the proposal is to define the 5MW threshold as installed capacity the following wording "...this will relate to the maximum level of Active Power deliverable to the DNO's Distribution System" does potentially leave room for a G100 device to control the maximum level of Active Power. It would be helpful if the legal definition was updated to allow for export limitation or other control devices that will limit the impact of the generator on the transmission network. I believe that this is covered by the response of the work group to this legal text.
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 It would be interesting to understand if the restrictions in Scotland are caused by the transmission/distribution voltage thresholds as there
---	--	---

## Public

		are several areas of Scotland (especially former or current industrial areas) that have significant electrical networks that are comparable to England and Wales.
8	Is it clear that the change in threshold is cumulative not incremental?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Click or tap here to enter text.
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  As per answer to question 1, the threshold appears to have been derived using high level statistical analysis. In reality the actual figure that can be connected is massively circumstantial and a more robust solution would be to provide details at either GSP or regional levels.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Where on the network the generation is to be installed needs to be considered e.g an 11KV behind the meter likely has two voltage levels (33KV & 132KV) between the generation and the GSP; due to the amount of load and impedance in this scenario it is very unlikely that this would have much (if any) impact on the transmission network. Also, given the 5MW threshold, it is more than likely that most connections that benefit from the increased threshold will be connected at the lower distribution voltages due 5MW connections at 33KV and above being financially unviable.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No  As per my answer to question 10, the network parameters between the proposed generation connection and the GSP need to be considered rather than applying an arbitrary level. The tools should be provided to allow customers to provide a model to demonstrate that additional short circuit current contributions on the network as a

## Public

		<p>result of the new generation will have a negligible impact at the transmission level.</p> <p>Also, the workgroup pointed out that NGET would need to publish which GSP's currently have restrictions due to fault level, this list would need to be revised and updated as the network evolves.</p>
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?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>There is a risk that customers will be contracted to 5MW of export when all they are actually looking for is a means of installing generation for self consumption. Additional measures should be put in place to ensure that the DNO has this conversation with the customer to avoid unnecessary contracted generation that could impact generation being connected that supports the whole system and a solution that benefits the customer and the DNO is provided.</p> <p>Also, there needs to be further clarification around the options for customers to be more flexible with their generation and demand that will benefit both the customer and the network.</p>
13	Do you believe that as consequence of CMP446 there will be an increase in <5MW projects which is likely to have an impact on the Transmission Network? If so, what kind of projects could drive this?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>As per my answer to question 10, I believe that most connections that benefit from this will be at the lower voltages so the impact to the transmission network will be negligible. However, an impact assessment could look at the potential worst case scenario e.g max export when load is minimal; could there be some mitigation for this event to ensure that renewables are not hamstrung by credible but statistically unlikely events? E.G could the DSO's use historical load data along with predicted export to request generation to be turned down/off based on real time information?</p>
14	Do you have any suggestions for any additional mitigation measures for the identified risk?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Customers should be able to demonstrate additional control measures to confirm that the generation will not have an impact on the transmission network e.g fault level limitation devices, G100 devices to control export, control devices that match generation to load.</p>

## Public

15	Do you understand that as a consequence of CMP446 that the curtailment assumptions for an accepted Technical Limits offer could be impacted?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		Would it be possible to provide more information on how projects with TL applied will be affected?
16	Is the timeline of interactions understood?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Click or tap here to enter text.
17	Do you believe it is appropriate/ within scope of CMP446 for the Workgroup to consider this further, and if so why?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>It is likely that the vast majority of connections that will benefit from this proposed change will be connected at either LV or 11KV. Assuming that the amount of 'network' between the connection and the GSP is a factor (e.g the huge amount of impedance involved with the upstream voltages) in allowing the increase in threshold, it seems reasonable to suggest that this be made part of the accepted practise to avoid this becoming a problem.</p> <p>This could be especially helpful in aligning with the alternative proposal in question 1.</p>