

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

Workgroup Meeting 6, 19 February 2025

Online Meeting via Teams

# WELCOME

# Agenda

Topics to be discussed	Lead
Welcome	Chair
Actions update	Proposer
Workgroup Consultation Responses Summary and Feedback Discussion	Chair
Alternative Requests and Potential Vote	Chair
Any Other Business	All
Next Steps	Chair

# 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	Eligibility to Vote
Proposer	Martin Cahill	NESO	Eligible
Workgroup Member	Brian Hoy	Electricity North West	Eligible
Workgroup Member	Ciaran Fitzgerald	Scottish Power Renewables	Eligible
Workgroup Member	Dan Clarke	National Grid Electricity Transmission (nominated by NESO)	Eligible
Workgroup Member	Drew Johnstone	Northern Powergrid	Eligible
Workgroup Member	Garth Graham	SSE Generation	Eligible
Workgroup Member	Grant Rogers	Qualitas Energy	Eligible
Workgroup Member	Helen Stack	Centrica	Eligible
Workgroup Member	Jack Purchase	National Grid Electricity Distribution	Eligible
Workgroup Member	Joe Colebrook	Innova Renewables	Eligible
Workgroup Member	Kate Teubner	Low Carbon	Eligible
Workgroup Member	Kyran Hanks	WWA (nominated as a CUSC Panel Member)	Eligible
Workgroup Member	Nina Sharma	Drax	Eligible
Workgroup Member	Ross O'Hare	SSEN	Eligible
Workgroup Member	Zivanayi Musanhi	UK Power Networks	Eligible
Authority Representative	Alasdair MacMillan	Ofgem	N/A

# 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.

# Timeline for CMP446 on 17 February 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 Meeting 4	05/02/2025	Workgroup Consultation Review
CMP446 Workgroup Meeting 5	06/02/2025	Workgroup Consultation Review
CMP446 Workgroup Consultation	07/02/2025 - 13/02/2025	
<b>CMP446 Workgroup Meeting 6</b>	<b>19/02/2025</b>	<b>Workgroup Consultation feedback and any Alternative votes</b>
CMP446 Workgroup Meeting 7	24/02/2025	Finalise legal text and ToR Confirmation, Workgroup Vote
CMP446 Workgroup Meeting 8	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	29/04/2025	
CMP446 Implementation Date	02/05/2025	

# Terms of Reference

## Workgroup Term of Reference

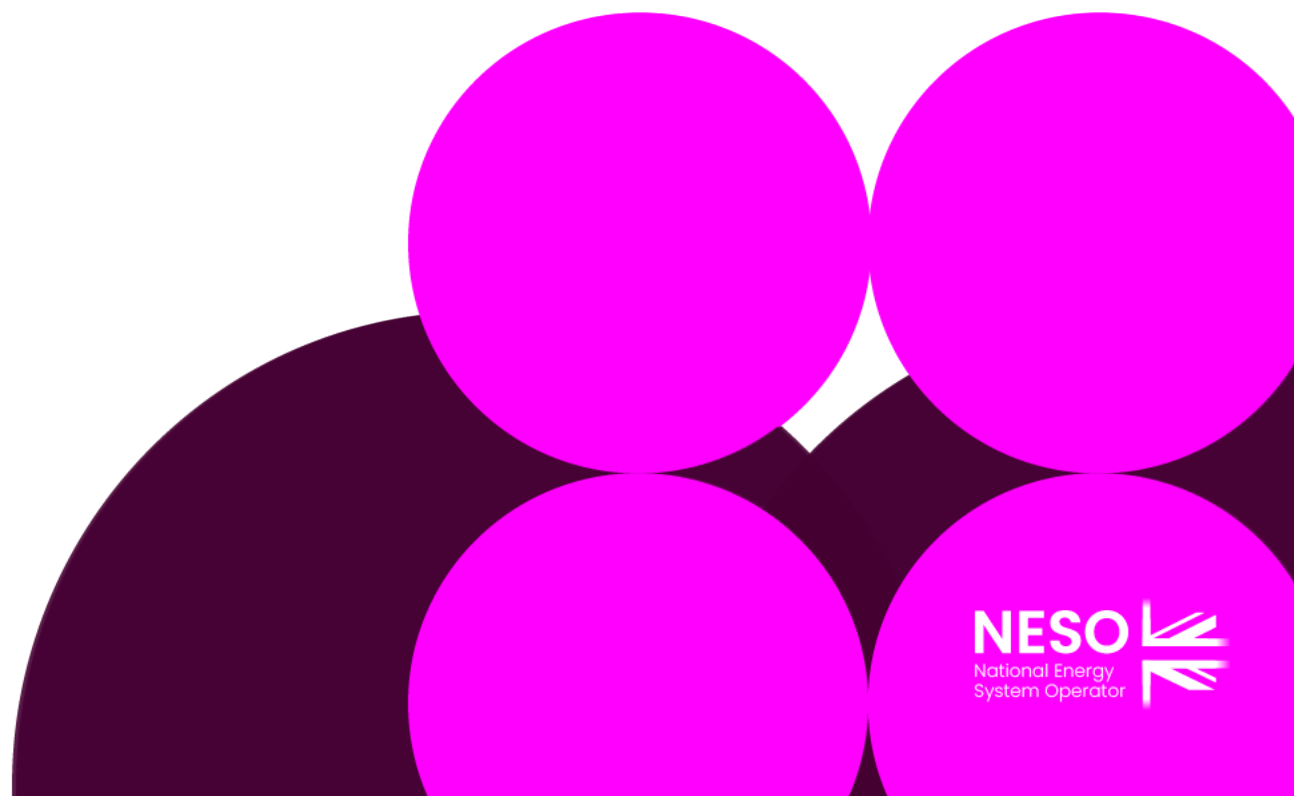
- |    |  |
|----|--|
| a) | Consider EBR implications  |
| b) | Consider the scope of work identified and whether this is achievable within the timeframe outlined in the Ofgem Urgency decision letter.   |
| c) | Consider the legal and practical implementation of this modification alongside CMP434/CMP435 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 (4MW to 6MW), and projects that reduce to be below the threshold. |
| j) | Consider potential for interlinked impact of cumulative/aggregated <5MW projects which would otherwise breach the proposed 5MW threshold.  |
| k) | Consider the interaction with Technical (Planning) limits and Distribution (DNO) managed Active Network Management (ANM) schemes   |

# Public Actions

Action number	Action	Status
15	Confirm the plan for communications for existing projects, whether they do or do not have to do apply for Gate 2. It was noted that this could be the responsibility of DNOs, however this will be confirmed.	Open
24	The Proposer took an action to ensure that the fault level headroom considerations are clearly documented in the Workgroup consultation, including any necessary legal text adjustments.	Open
25	It was confirmed by NGET that a list of GSPs that have no fault level headroom will be made available next week, and that the Proposer will consider what the enduring solution will be for the list to be made available publicly.	Open
26	The Proposer of Alternative 1 took an action to consider changing the terminology within this proposal from "MVA" to "MW".	Open
32	The NESO Representative took an action to revise the wording to make the explanation of technical limits clearer and to include a link to the public-facing rule book. A further discussion will be held with Workgroup members on this post-consultation.	Open

# Action Updates

Martin Cahill / Alex Markham - NESO



# Action 15 Communications

NESO Connections Reform Communications will include:

- Webinars
- Press Release
- Social Media
- Web age updates
- Connections Forum
- Customer Seminar
- NESO Newsletter
- FAQs

# Action 24 Fault Level Headroom Considerations

1. Workgroup Consultation Document was updated with considerations for fault level headroom
2. Since the last Workgroup meeting we have considered additional interactions, such as impact on CP2030

Our view is that, as per legal text (where a connection at a GSP with no fault level headroom would be considered an exception), a generator sized 1-5MW applying at a GSP with no fault level headroom should be classed as a Relevant Power Station and therefore included in Appendix G and CP2030 buckets

3. While legal text includes an exception, as this is a scenario that is expected to happen at certain GSPs, it may benefit from slight re-wording

*(f) In England and Wales, it is acknowledged that (unless notified otherwise by The Company and on basis this should be the exception rather than the norm) only an Embedded Small Power Station which [has a Registered Capacity (as defined in the Distribution Code) of][is] 5MW or above is a Relevant Embedded Small Power Station requiring the submission of an Evaluation of Transmission Impact to The Company in accordance with Paragraph 5.1(a) above."*

## Action 25 Fault Level Headroom at GSPs

- Out of 175 GSPs, 40 have FL <1. 22% of sites are affected currently by FL
- 682MW of the 852MW identified in the queue would still go through the process without requiring a TIA
- 170MW would have to go through the process due to applying at a GSP affected by fault level headroom
- NESO to publish a list of sites than fall below <1 kA, 1 month before a gated window opens.

# Action 25 Fault Level Headroom at GSPs

ENWL	NGED		NPG	SEPD	SPManweb	UKPN	
Bold	Aberthaw	Melksham	Willington	East Claydon	Capenhurst	Biggleswade	Sundon
Harker	Abham	Pembroke	Poppleton	Melksham	Kirkby	Bolney	Walpole
Heysham	Alverdiscott	Rugeley	Thorpe Marsh	Minety		Braintree	West Weybridge
Hutton	Cellarhead	Shrewsbury	Tynemouth			Canterbury North	
Kearlsey	East Claydon (WM)	Walpole				Eaton Socon	
South Manchester	East Claydon (EM)	West Burton				Norwich	
Stalybridge	Ironbridge	Willington				Rayleigh	

# Links to DNO data sources

DNO	Link
UKPN	<a href="https://www.ukpowernetworks.co.uk/guide-pages/pre-application-support">https://www.ukpowernetworks.co.uk/guide-pages/pre-application-support</a>
NGED	<a href="https://www.nationalgrid.co.uk/our-network/statement-of-works/appendix-g-information">https://www.nationalgrid.co.uk/our-network/statement-of-works/appendix-g-information</a>
ENWL	<a href="https://www.enwl.co.uk/get-connected/network-information/heatmap-tool/">https://www.enwl.co.uk/get-connected/network-information/heatmap-tool/</a>
NPG	<a href="https://northernpowergrid.opendatasoft.com/explore/dataset/gsp-appendix-g-information/export/">https://northernpowergrid.opendatasoft.com/explore/dataset/gsp-appendix-g-information/export/</a>
SSE	
SPManweb	

# Action 32 Technical Limits

*Technical Limits Rulebook:*

<https://www.energynetworks.org/publications/grid-supply-point-technical-limits-for-accelerated-non-firm-connections>

- Technical Limits is a new tool which looks to accelerate projects on a non-firm basis connecting before their Transmission Works have completed.
- Once associated works are completed, they could connect on a firm basis however Transmission reinforcement works could no longer be deemed required.
- Calculation is based on projects captured within an Appendix G.
- If CMP446 is approved, NESO plan to remove projects under the threshold and not yet connected from BCAs and Appendix G
- This could reduce the technical limits that other projects above the TIA must comply with and could also mean less curtailment if projects being removed from the agreement are higher in LIFO stack

# Workgroup Consultation Responses Summary and Feedback Discussion

Milly Lewis – NESO Code Administrator

# Overview of responses

Q1 - Do you believe that the Original Proposal better facilitate the Applicable Objectives?

	None	a	b	c	d
Original	3	18	15	7	17
Alternative Request 1	4	17	16	4	14

	Yes	No	No response
Q2 - Do you support the proposed implementation approach?	19	1	0
Q3 - Do you have any other comments?	13	7	0
Q4 - Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider?	2	18	0
Q5 - Does the draft legal text satisfy the intent of the modification?	13	6	1
Q6 - 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?	20	0	0
Q7 - Do you believe that a codification of Scotland threshold is required for CMP446?	8	12	0
Q8 - Is it clear that the change in threshold is cumulative not incremental?	18	2	0
Q9 - 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)	10	10	0
Q10 - Are there any other generic scenarios (over and above those shown in Figure 2 and Figure 3) that need to be considered by the Workgroup, please provide details of them and explain why they are relevant?	5	15	0
Q11 - 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?	11	8	1
Q12 - 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?	12	6	2
Q13 - 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?	12	5	3
Q14 - Do you have any suggestions for any additional mitigation measures for the identified risk?	10	10	0
Q15 - Do you understand that as a consequence of CMP446 that the curtailment assumptions for an accepted Technical Limits offer could be impacted?	17	2	1
Q16 - Is the timeline of interaction understood?	20	0	0
Q17 - Do you believe it is appropriate/within scope of CMP446 for the Workgroup to consider this further, and if so why?	4	15	1

# Public Workgroup Consultation Responses alignment with Terms of Reference

Workgroup Term of Reference	Related Workgroup Consultation question	Feedback
a) Consider EBR implications	Question 6	100% agreement that there are no implications
b) Consider the scope of work identified and whether this is achievable within the timeframe outlined in the Ofgem Urgency decision letter.	Question 7 and Question 17	Majority of respondents felt that Scottish codification and high voltage connections were out of scope
c) Consider the legal and practical implementation of this modification alongside CMP434/CMP435 and any other relevant in flight CUSC modifications.	Question 2, Question 16	All respondents confirmed that they understood the timeline of implementation and the majority agreed with the proposed implementation approach.  Some legal text suggestions were posed to provide clarity
d) Consider any cross-code impacts.	No questions	
e) Consider data and any other requirements from DNOs to implement	No questions	
f) Consider how CMP446 would be compatible with the requirement for the NESO acting in a non-discriminatory manner	Question 7	The majority of the 12 respondents who didn't believe that Scotland needed to be codified for CMP446 stated that it would be desirable longer term
g) Consider how CMP446 would be compatible with the requirement for harmonised rules for generator connections in GB.	Question 7	The majority of the 12 respondents who didn't believe that Scotland needed to be codified for CMP446 stated that it would be desirable longer term

Workgroup Term of Reference	Related Workgroup Consultation question	Feedback
h) Consider what the MW capacity relates to: for example, export capacity or installed capacity or developer capacity?	Question 1 and Question 5	The difference between the Original and Alternative Request 1 pivots around the chosen definitions. Whilst the majority of respondents agreed that both better met the AO than the baseline there was a preference for Alternative Request 1 (Export 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 (4MW to 6MW), and projects that reduce to be below the threshold.	Question 10	The majority of respondents agreed that the scenarios (both for new and existing) had been considered by the Workgroup
j) Consider potential for interlinked impact of cumulative/aggregated <5MW projects which would otherwise breach the proposed 5MW threshold.	No questions	
k) Consider the interaction with Technical (Planning) limits and Distribution (DNO) managed Active Network Management (ANM) schemes	Question 15	The majority of respondents believed that the Workgroup had explained the link between Technical limits and the modification

# Further breakdown to come...

# Alternative Requests and Potential Vote

Milly Lewis – NESO Code Administrator

**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.

There are 3 Alternative Requests for **CMP446**:

Alternative 1 – Export Capacity

Alternative 2 – Threshold to 10MW at 11kV

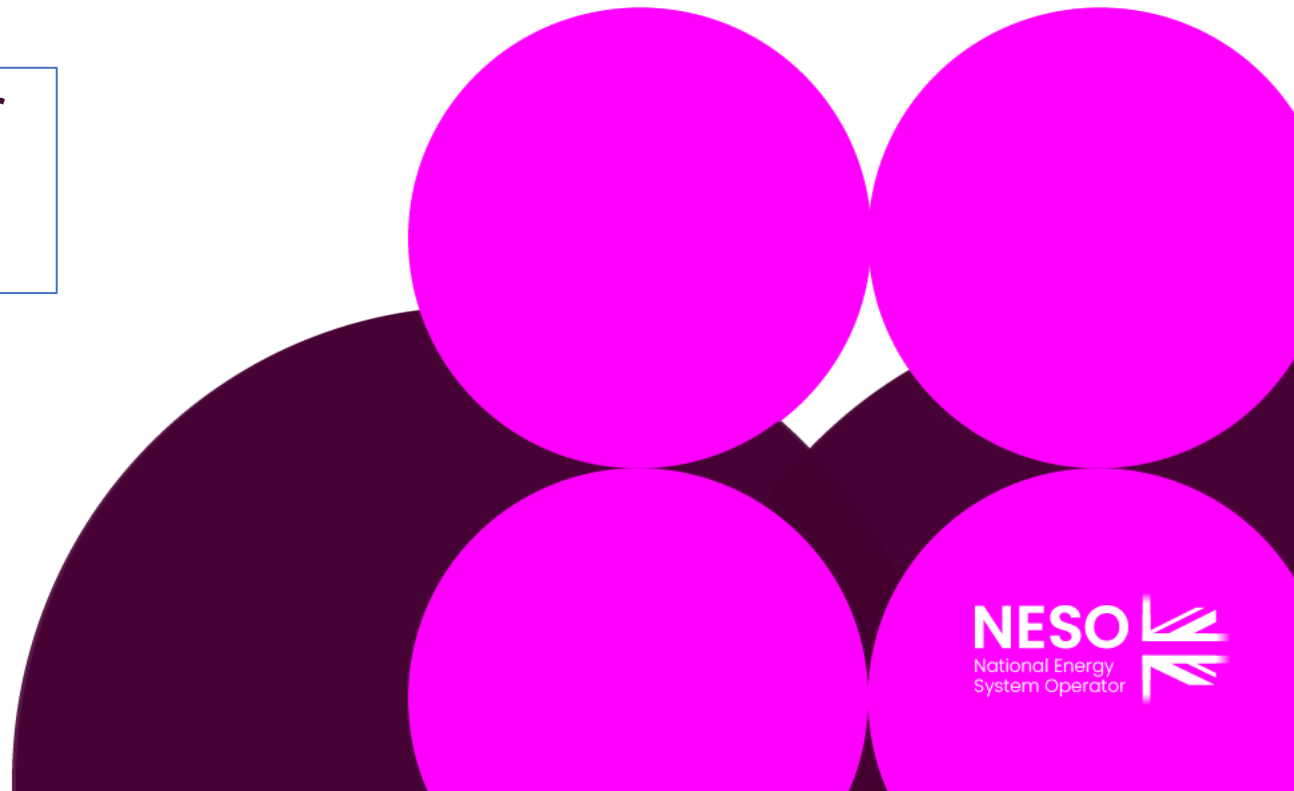
Alternative 3 – TIA threshold at GSPs

**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.

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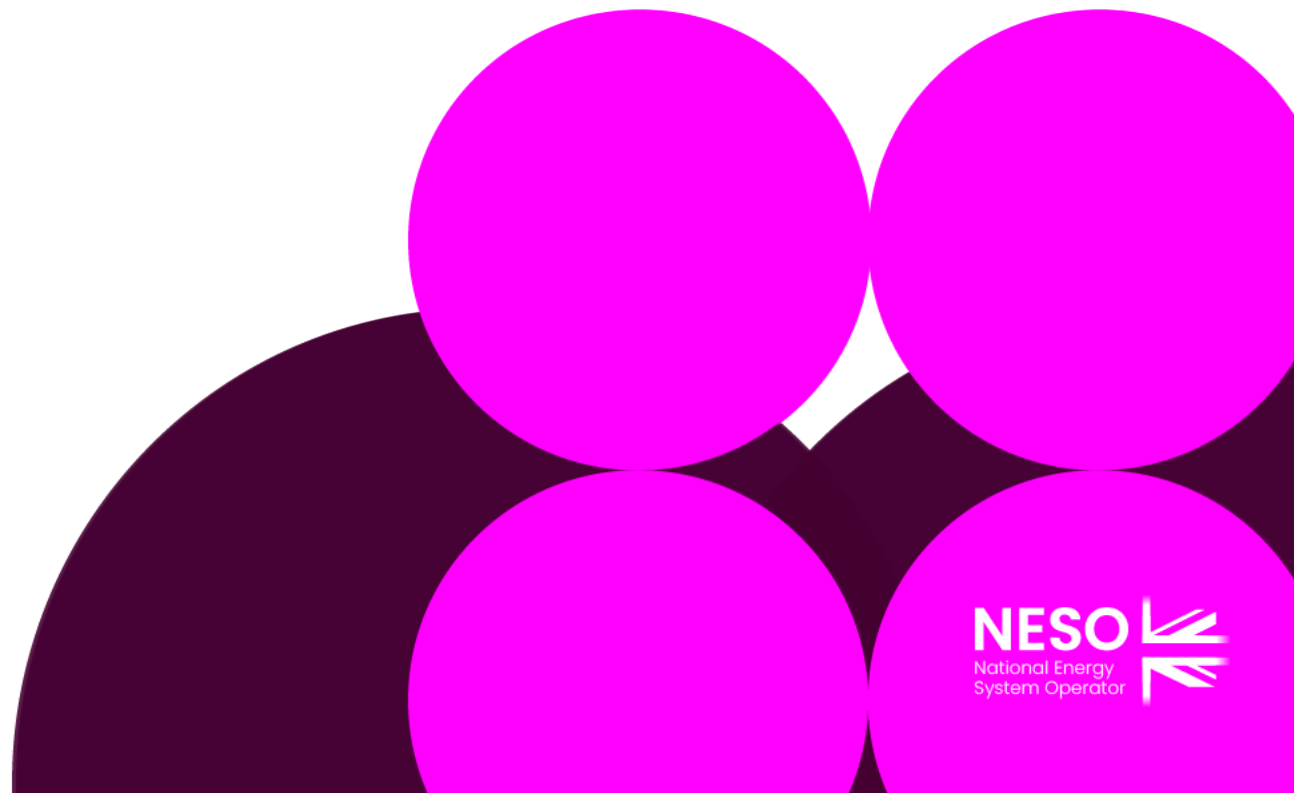
# Any Other Business

Milly Lewis – NESO Code Administrator



# Next Steps

Milly Lewis – NESO Code Administrator



# Timeline for CMP446

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