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## Code Administrator Consultation Response Proforma

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

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@nationalenergygyso.com](mailto:cusc.team@nationalenergygyso.com) by **5pm on 17 March 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@uk.nationalenergygyso.com](mailto:milly.lewis@uk.nationalenergygyso.com) or [cusc.team@nationalenergygyso.com](mailto:cusc.team@nationalenergygyso.com)

Respondent details	Please enter your details	
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<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network Operator <input 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 checked="" 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 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 Code Administrator Consultation questions			
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	Mark the Objectives which you believe the proposed solution(s) better facilitates:	
		Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		WACM1	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		WACM2	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		WACM3	<input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input 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

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		<p>All WACMs better facilitate ACO (a), as the increase in threshold enables a quicker and more efficient connections process for smaller scale generation with minimal impact on the National Electricity Transmission System.</p> <p>The Original Proposal, WACM1, WACM2 and WACM5 better facilitate ACO (b) as these enable the timely connection of more smaller scale generation without the delays associated with the TIA process, helping to meet net zero and Clean Power 2030 targets. WACM3 and WACM4 introduce an arbitrary cap without an impact assessment, which can hinder competition by introducing additional costs to some projects without an appropriate assessment.</p> <p>The Original Proposal, WACM1, WACM2 and WACM5 better facilitate ACO (d) as these concentrate on projects that are more likely to have an impact on the Transmission System. The arbitrary cap in WACM3 and WACM4 introduces additional complexity, time, cost and lack of clarity for customers which may not be justified.</p>
2	Do you have a preferred proposed solution?	<p><input type="checkbox"/> Original</p> <p><input checked="" 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 type="checkbox"/> Baseline</p> <p><input type="checkbox"/> No preference</p> <p>WACM1 is our preferred solution as:</p> <ul style="list-style-type: none"> <li>The intent of the TIA threshold is to capture sites which are likely to materially impact the</li> </ul>

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		<p>transmission network, we consider that basing the threshold on export capacity rather than installed capacity is more appropriate.</p> <ul style="list-style-type: none"> <li>The present data exchange processes between network companies already include generators <math>\geq 1</math> and <math>&lt; 5</math> MW. When submitting applications for TIA, the fault level infeed data is provided, which is reflective of the total contribution from the installed generator capacity.</li> <li>Where there is limited fault level headroom, and the installed capacity is <math>&gt; 1</math> MW, the Distribution Network company can evaluate the fault level impact at the interface and where it reasonably believes a generator could have an impact on the transmission network (the fault level headroom would decrease to <math>&lt; 1</math> kA) trigger a submission. This would require receiving regular updates on the available fault level headroom at the T/D interface points, also including the impact of any new or future direct T-connected users.</li> </ul>
3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>SPEN supports the need to improve the current connections process to facilitate the timely connection of distribution projects with minimal impact on the National Electricity Transmission System, helping to meet net zero and Clean Power 2030 targets.</p> <p>To enhance the connections process for smaller Distributed Generation (DG) projects with minimal transmission system impact, we support the proposed threshold increase from 1 MW to 5 MW through WACM1 within the CUSC for England and</p>

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		<p>Wales. SPEN view that the implementation of CMP446 should be coordinated ahead of CMP435.</p> <p>We do not support the introduction of a codified threshold in the CUSC for central and southern Scotland as part of CMP446.</p>
4	Do you have any other comments?	<p>Appendix G could be updated to capture both Export and Installed Capacities.</p> <p>WACM 2 and WACM 5 require the NESO to publish a register for each GSP. The legal text does not limit this to England and Wales. However, if this register is to be GB wide, clarity is required on how and when the NESO will engage with SPT to get this information and the frequency/timing with which it is updated must be set out.</p> <p>Also, we believe the register should be for information only, as the level of required maintenance can prove difficult due to the dynamic nature of the queue and projects being at different contractual stages. This would allow for a lower threshold to be applied if, for example, a large number of applications is received at once prior to/in an Application Window necessitating a reduction in the TIA threshold.</p>
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 Code?	<div> <input checked="" type="checkbox"/> Yes           <input type="checkbox"/> No         </div> <div>Click or tap here to enter text.</div>