

Public

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@nationalenergyiso.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.nationalenergyiso.com or cusc.team@nationalenergyiso.com

Respondent details	Please enter your details	
Respondent name:	Ciaran Fitzgerald	
Company name:	Scottish Power Renewables	
Email address:	Cfitzgerald@scottishpower.com	
Phone number:	07867 191168	
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 Panel or the industry for further consideration)

For reference the Applicable CUSC (non-charging) Objectives are:

Public

- 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 checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		WACM4 <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		WACM5 <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		<p>We view this proposal, and each of the WACMS, as a positive change which can better facilitate competition within the industry. This is because it will give smaller generators, which may have more complex funding models and require shorter connection timescales, a more straightforward and less costly path to connection. This will increase the likelihood of these projects developing successfully and connecting, which brings additional competition to the market. Therefore, Applicable Objective B is better facilitated.</p> <p>Although there are potential unintended consequences, which should be monitored and are noted in the responses to questions 2 and 3, this network impact will be potentially minimal. This is because of the relatively small cumulative</p>

Public

		capacity of the projects that will benefit from the change. In removing the obligation for NESO and the TOs to facilitate and carry out the TIA assessments for these projects, this will increase the efficiency of the processes being carried out by NESO and the TOs. Furthermore, resource freed up from the assessments no longer being undertaken can be utilised for the timely completion of the remaining TIA assessments and other activities. Therefore, Applicable Objective's A and C are better facilitated.
2	Do you have a preferred proposed solution?	<p> <input type="checkbox"/> Original <input type="checkbox"/> WACM1 <input type="checkbox"/> WACM2 <input type="checkbox"/> WACM3 <input checked="" type="checkbox"/> WACM4 <input type="checkbox"/> WACM5 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference </p> <p>As noted in the response to Q1, we believe the original and each WACM facilitates the objectives better than the baseline.</p> <p>WACM 1 - Our view is that the threshold should be based on the 'Export Capacity' rather than 'Registered Capacity'. Its possible that registered capacity will be higher than the export capacity, but generators are only ever permitted to export to their export capacity, and therefor it is the more appropriate value to use. We prefer WACM1 to the Original.</p> <p>WACMs 2 and 5 – We agree with the proposer of WACMs 2 and 5 that there needs to be as much clarity and transparency as possible of the TIA thresholds. It is unfortunate that the challenge around fault level headroom at GSPs makes it impossible to have a consistent threshold across England and Wales. However, we understand that this is unavoidable for safety reasons and agree it is still best to proceed with the mod and manage this issue. WACMs 2 and 5 are positive ways of addressing the issue and allowing developers to be knowledgeable and informed. We prefer both the original and prefer WACM 5 to WACM 2 for the reasons outlined on WACM 1.</p> <p>WACMs 3 and 4 – We believe there is a risk of unintended consequences from this mod which could have an adverse effect on the network or projects with capacity > 5MW. The primary risk is that there will be too many projects applying</p>

Public

		<p>with capacity less than 5MW. This could come from natural variations in application types, projects with capacity just over 5MW reducing their capacity to take advantage of the mod or develops gaming the system and getting multiple connections with each capacity < 5MW. This WACM is one means of mitigating against that risk and therefore we support it. We prefer WACMs 3 and WACM4 to the baseline and our preference is WACM4 of the two.</p> <p>Overall, our preference is WACM4 as it deals with the most significant issue, but a combination of WACM4 and WAC5 would be the optimal option.</p>
3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>For the benefits to be fully realised, we agree that the modification must be complete prior to the Gate 2 to Whole Queue process commencing.</p>
4	Do you have any other comments?	<p>It would be preferable to have a harmonized approach across GB, with the threshold being codified, or not, across Scotland, England and Wales. If the decision is taken to codify the threshold in England and Wales, then a timeline should be set out for Scotland to do the same.</p> <p>If the mitigations proposed in WACM3 and WACM4 do not form part of the proposed solution, then we strongly believe an alternative mitigation to the risk of the category of <5MW capacity projects being oversubscribed. During the workgroup discussions, this was repeatedly raised as a real risk and developers shared their experience of potential applicants looking to take advantage of the mod – either through a legitimate opportunity or through ‘gaming’. An alternative mitigation is required – as a minimum this should be a regular and structured review process undertaken by NESO.</p>
5	Do you agree with the Workgroup’s assessment that the	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

Public

	modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code?	N/A
--	---	-----