

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](mailto: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](mailto:milly.lewis@uk.nationalenergyiso.com) or [cusc.team@nationalenergyiso.com](mailto:cusc.team@nationalenergyiso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Jack Purchase	
<b>Company name:</b>	National Grid Electricity Distribution	
<b>Email address:</b>	jpurchase@nationalgrid.co.uk	
<b>Phone number:</b>	01209 616645	
<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 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:

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence\*;
- 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;

## Public

- 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?	<p>Mark the Objectives which you believe the proposed solution(s) better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> <tr> <td>WACM1</td> <td><input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> <tr> <td>WACM2</td> <td><input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D</td> </tr> <tr> <td>WACM3</td> <td><input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D</td> </tr> <tr> <td>WACM4</td> <td><input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D</td> </tr> <tr> <td>WACM5</td> <td><input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D</td> </tr> </table> <p>Click or tap here to enter text.</p>	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 type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	WACM3	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	WACM4	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D	WACM5	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
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 type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D													
WACM3	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D													
WACM4	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D													
WACM5	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D													
2	Do you have a preferred proposed solution?	<p> <input type="checkbox"/>Original  <input checked="" type="checkbox"/>WACM1  <input type="checkbox"/>WACM2  <input type="checkbox"/>WACM3  <input type="checkbox"/>WACM4  <input type="checkbox"/>WACM5  <input type="checkbox"/>Baseline  <input type="checkbox"/>No preference         </p> <p>WACM1 will provide the biggest benefit to the largest number of customers. Particularly high</p>												

## Public

		energy customers looking to decarbonise by installing generation on a demand site with an existing meter.
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>To gain the full benefit of this modification implementation would be completed prior to the Gate 2 to Whole Queue exercise under CMP435. We are supportive of the urgent approach taken.</p>
4	Do you have any other comments?	<p>We are not supportive of WACM3 or WACM4, there has not been sufficient time to consider the impact of these proposals. It is likely that they would reduce the overall effectiveness of the modification and slow progress towards a Net Zero network.</p> <p>Two possible consequences of CMP446 to note are &lt;5MW schemes will not be compelled to participate in TANM for both forward and reverse power flow:</p> <ul style="list-style-type: none"> <li>• This will introduce some inconsistencies between the DANM and TANM LIFO queues, and</li> <li>• The TANM curtailment for schemes &gt;5MW will likely be adversely impacted as the cumulative total volume of &lt;5MW increases over time.</li> </ul> <p>Under the proposal where the fault level headroom was less than 1kA or zero projects will be required to go through the TIA irrespective of the change in threshold (from 1MW to 5MW). Our current view is that &lt;5MW schemes should not have to go through a formal TIA, but DNOs should be able to put these schemes on 'hold' pending completion of the relevant fault level reinforcement scheme as is already the case with the current threshold.</p> <p>We are not supportive of WACMs 2 and 5. We believe the issues raised as part of these alternatives should be discussed more broadly in</p>

## Public

		the context of Connections Reform to maximise the benefit for industry.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Click or tap here to enter text.