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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@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>                        | Zivanayi Musanhi  |   |
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| <b>Phone number:</b>                           | 07875111989   |   |
| <b>Which best describes your organisation?</b> | <input type="checkbox"/> Consumer body<br><input type="checkbox"/> Demand<br><input checked="" type="checkbox"/> Distribution Network Operator<br><input type="checkbox"/> Generator<br><input type="checkbox"/> Industry body<br><input type="checkbox"/> Interconnector | <input type="checkbox"/> Storage<br><input type="checkbox"/> Supplier<br><input type="checkbox"/> System Operator<br><input type="checkbox"/> Transmission Owner<br><input type="checkbox"/> Virtual Lead Party<br><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:

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- 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  |
|  |  | We believe that all solutions better facilitate ACO (a) by eliminating the need for an Evaluation for Transmission Impact Assessment (TIA) for smaller projects with no/minimal impact on the transmission system. This will lead to quicker connections and enable concentrated efforts to assess larger projects that have significant impact on the transmission network. All solutions will better facilitate ACO (b) as they enable embedded generation schemes with no/minimal impact on the transmission system to connect to the network quicker driving down costs |

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|   |  | for the end consumer whilst decarbonising the electricity system. All solutions will better facilitate ACO (d) as they enable a more efficient connections process for smaller generation that is proportionate with their impact on the transmission network.   |
| 2 | Do you have a preferred proposed solution? | <p> <input type="checkbox"/> Original<br/> <input checked="" type="checkbox"/> WACM1<br/> <input type="checkbox"/> WACM2<br/> <input type="checkbox"/> WACM3<br/> <input type="checkbox"/> WACM4<br/> <input type="checkbox"/> WACM5<br/> <input type="checkbox"/> Baseline<br/> <input type="checkbox"/> No preference         </p> <p>We consider WACM1 to be more preferable.</p> <p>The Original solution proposes to use Installed capacity as a basis for establishing the TIA threshold which is a shift from the current industry practice that uses Export capacity. We believe that the use of this definition is disproportionate to the impact these projects will have on the transmission network. Furthermore, the Original solution as proposed will impede embedded demand customers from decarbonising their operations, as a behind the meter addition of renewable generation would still require an Evaluation for Transmission Impact Assessment even if they do not intend to export power onto the distribution network. This will lead to significant costs and long lead times for such projects which counteracts the objectives of this modification proposal.</p> <p>We support transparency regarding TIA thresholds in GSPs across England and Wales as proposed by WACM2 and WACM5. However, it is unclear what level of governance will be in place for any changes to the TIA threshold. We believe that WACM1 provides a more suitable level of governance for any future changes to these thresholds, ensuring a clearer and more consistent approach.</p> |

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|   |   | <p>It is our view that the 25MW limit proposed by WACM3 and WACM4 lacks sufficient analysis and does not account for variations in network size and available capacity at different GSPs across England and Wales. This cap also introduces inefficiency due to the additional administrative burden and limits the benefits where other drivers for GSP reinforcement might ensure additional capacity is added to the GSP. The volume of sub-5MW generation will continue to be monitored and reported by the DNO/IDNO as required by its licence conditions and the Grid Code. Furthermore, Grid Code modification proposal GC0139 proposes that DNOs/IDNOs forecast generation growth by technology type at each GSP. This will enable the monitoring of growth trends at each GSP (by both NESO and NGET) which will in turn facilitate appropriate proactive intervention to be taken for specific GSP.</p> |
| 3 | Do you support the proposed implementation approach?  | <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>We agree with CMP446 being implemented ahead of Connections Reform arrangements as it will enable sub 5MW generators to connect without being subject to the Gate 2 To Whole Queue process whilst promoting an efficient process for updating the relevant Bilateral Connection Agreements. This will avoid duplication of effort due to the need to reassess the existing transmission connection works, saving cost and time compared to if this were to be implemented after Connections Reform.</p>  |
| 4 | Do you have any other comments?                       | <p>Click or tap here to enter text.</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>   |

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|  | modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code? | We do not believe it has any direct impacts on the Electricity Balancing Regulation (EBR) Article 18 as it does not seek to change any existing Balancing Services. |
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