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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 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:	Brian Hoy	
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Which best describes your organisation?	<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*)

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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
		<p>All options better facilitate ACO(a) as relatively small projects that have limited impact on the transmission system can progress more quickly and at lower costs than they currently can. This will help meet CP30 targets.</p> <p>Most options better facilitate ACO(b) as it allows smaller projects the opportunity to progress without hindering their progress. Whilst the intent of WACMs</p>

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		<p>3 & 4 to mitigate against a dramatic change in future customer behaviour, the mechanism has not had sufficient time to be developed due to the urgency treatment of this modification. The ramifications of setting an effectively arbitrary threshold has not had time to be assessed fully and therefore could create competition issues.</p> <p>All options are neutral in facilitating ACO(c). Most options better facilitate ACO(b) as they remove costs and restrictions to 1-5MW projects that have marginal impact on the transmission network.</p> <p>WACMs 3 & 4, in introducing a threshold add additional complexity and in particular how this approach would be applied to the existing queue. This risks not giving clarity to any existing customers that are contracted but not yet connected as to whether they need to go through the Gate 2 assessment process.</p>
2	Do you have a preferred proposed solution?	<p><input type="checkbox"/> Original</p> <p><input type="checkbox"/> WACM1</p> <p><input type="checkbox"/> WACM2</p> <p><input type="checkbox"/> WACM3</p> <p><input type="checkbox"/> WACM4</p> <p><input checked="" type="checkbox"/> WACM5</p> <p><input type="checkbox"/> Baseline</p> <p><input type="checkbox"/> No preference</p> <p>The Original, WACM1, WACM2 and WACM5 overall are supported. WACM3 and WACM4 are not supported due to the additional complexity and risks due to them not being fully assessed.</p> <p>In terms of preference, WACM1 is preferred over the original. In particular, with the quantum of GSPs where there are fault level issues identified, this mitigates the risk of using export capacity, which ultimately is the impact seen on the network.</p> <p>WCAM5 is a further enhancement of WACM1 in that it adds extra transparency for customers. WACM5</p>

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		<p>also conveys the option for NESO to change the thresholds at each GSP and there provides a route to mitigate the impact if the risk of a dramatic change in customer behaviour materialises as opposed to the arbitrary cap proposed by WACMs 3 & 4.</p> <p>On balance therefore, WCAM 5 is preferred.</p>
3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>It is important that this is implemented so that the approach can be used in the assessment of the existing queue.</p>
4	Do you have any other comments?	No
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?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>