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## Workgroup Consultation Response Proforma

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

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@nationalenergyso.com](mailto:cusc.team@nationalenergyso.com) by **5pm** on **13 February 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@nationalenergyso.com](mailto:milly.lewis@nationalenergyso.com) or [cusc.team@nationalenergyso.com](mailto:cusc.team@nationalenergyso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Brian Hoy	
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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 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 Workgroup, 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 Workgroup Consultation questions												
1	Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/> A</td> <td><input checked="" type="checkbox"/> B</td> <td><input type="checkbox"/> C</td> <td><input checked="" type="checkbox"/> D</td> </tr> <tr> <td>Alternative Request 1</td> <td><input checked="" type="checkbox"/> A</td> <td><input checked="" type="checkbox"/> B</td> <td><input type="checkbox"/> C</td> <td><input checked="" type="checkbox"/> D</td> </tr> </table> <p>Both solutions increase the efficiency of the processes as 1-5MW projects will no longer have to go through the TIA/TEA processes and will be able to connect more quickly and without incurring TIA fees.</p>	Original	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D	Alternative Request 1	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
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Alternative Request 1	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D								
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>										
3	Do you have any other comments?	<p>We note the references to 4.95 being the threshold in the consultation. We think it would be simpler and clearer for all parties if the threshold was set at 5MW or above. This would be more intuitive for customers and avoid any issues arising for projects that are between 4.95 and 4.99.</p>										
4	Do you wish to raise a Workgroup Consultation	<p><input type="checkbox"/> Yes (the request form can be found in the <a href="#">Workgroup Consultation Section</a>)</p>										

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	Alternative Request for the Workgroup to consider?	<input checked="" type="checkbox"/> No  <a href="#">Click or tap here to enter text.</a>
5	Does the draft legal text satisfy the intent of the modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <p>We are not sure that adding an additional paragraph is helpful. In the existing text, 6.5.1(b) describes when an Evaluation of Transmission Impact is needed and therefore, we would suggest any amendments are made to this paragraph. The purpose of the existing 1MW threshold was to establish criteria so that the need for a TIA was clearer for both DNOs and customers wishing to connect to the Distribution network.</p> <p>An alternative solution is just to change the definition of Relevant Embedded Small Power Station to set the 5MW threshold.</p> <p>Legal drafting will need to be considered if CMP 434 is approved or WCAM 1 of the same consultation.</p>
6	Do you agree with the Workgroup's assessment that the modification does not impact the European Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <a href="#">Click or tap here to enter text.</a>

### Specific Workgroup Consultation questions

7	Do you believe that a codification of Scotland threshold is required for CMP446?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <p>It is currently not codified and therefore this change only seeks to change what is codified. Codify for Scotland should be considered under a separate modification.</p>
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8	Is it clear that the change in threshold is cumulative not incremental?	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No
		The intention of the proposal is clear but the final form of the legal text will need checking to ensure that intention follows through.
9	Do you believe 5MW is the correct threshold and if not why and to what threshold level should it be? (Providing rationale and justification for any alternative MW threshold)	<input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No
		Whilst we support the move to increase this lower threshold, the impact of any further increase is unclear. We would support further analysis to understand the impact if the threshold was increased to say 7MW. A 7MW threshold would broadly align with the connection being made to the HV distribution network in most situations. We believe that the existing obligations would place a duty on DNOs to put the project through the TIA process if it thought it would have a significant impact on the transmission network.
10	Are there any other generic scenarios (over and above those shown in Figure 2 and Figure 3 (Annex 7) that need to be considered by the Workgroup, please provide details of them and explain why they are relevant?	<input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No
		Click or tap here to enter text.
11	It is intended that where there is a fault level headroom that is less than 1kA or zero as stated by NGET at a GSP, then a project is required to go through the TIA irrespective of the change in threshold (from 1MW to 5MW) – do	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No
		We understand the safety risks and accept that this is a sensible approach. Transparency of the affected GSPs is important for both DNOs and customers as it will have an affect on costs and timescales for projects applying to connect.

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	you agree with this and if not, why?	
12	Do you agree that the Workgroup has identified the relevant risks if CMP446 is approved. If not, what further risks haven't been identified yet, and why are they relevant?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Click or tap here to enter text.
13	Do you believe that as consequence of CMP446 there will be an increase in <5MW projects which is likely to have an impact on the Transmission Network? If so, what kind of projects could drive this?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  We are unclear what this question is asking, had it said <5MW that would have been more understandable.  The following comments relate to <5MW. We would expect some increase in more projects in the 1-5MW range as this will be a natural reaction to any threshold where there are different treatments either side of the threshold. All projects have <u>some</u> impact on the transmission network but it is unlikely to be significant. The proposal is to instigate some tracking of these projects so this will give early sight of any change in customer behaviour.  The types of project that will move to <5MW is difficult to predict and may depend on how the 5MW threshold is defined (ie installed vs export). If it was based on export capacity, then some battery installations might look to become long duration storage.
14	Do you have any suggestions for any additional mitigation measures for the identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Additional criteria could be added that prevents a development of 20MW being split into four smaller 5MW projects.

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15	Do you understand that as a consequence of CMP446 that the curtailment assumptions for an accepted Technical Limits offer could be impacted?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  They may be but we expect the impact to be marginal. We would also note that Technical Limits is a short-term arrangement until the necessary reinforcement work is completed.
16	Is the timeline of interactions understood?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Click or tap here to enter text.
17	Do you believe it is appropriate/ within scope of CMP446 for the Workgroup to consider this further, and if so why?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  We think this is an unnecessary complication.