

Public

# CUSC Alternative and Workgroup Vote

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

**Please note:** To participate in any votes, Workgroup members need to have attended at least 50% of meetings.

### Stage 1 – Alternative Vote

If Workgroup Alternative Requests have been made, vote on whether they should become Workgroup Alternative CUSC Modifications (WACMs).

### Stage 2 – Workgroup Vote

2a) Assess the original and WACMs (if there are any) against the CUSC objectives compared to the baseline (the current CUSC).

2b) Vote on which of the options is best.

### Terms used in this document

Term	Meaning
<b>Baseline</b>	The current CUSC (if voting for the Baseline, you believe no modification should be made)
<b>Original</b>	The solution which was firstly proposed by the Proposer of the modification
<b>WACM</b>	Workgroup Alternative CUSC Modification (an Alternative Solution which has been developed by the Workgroup)

### 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\*;*

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- 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.*

## Workgroup Vote

### Stage 1 – Alternative Vote

Vote on Workgroup Alternative Requests to become Workgroup Alternative CUSC Modifications.

*The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.*

*Should the majority of the Workgroup OR the Chair believe that the potential alternative solution may better facilitate the CUSC objectives than the Original proposal then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative CUSC modification (WACM) and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.*

*"Y" = Yes*

*"N" = No*

*"Abstain"*

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Workgroup Member	Alternative 1 (SSE Generation, Using Export Capacity)	Alternative 2 (Centrica, Threshold to 10MW at 11kV)	Alternative 3 (Lightsource bp, TIA threshold at GSPs using Registered Capacity)	Alternative 4 (Centrica, Combined Alternative 1 and Alternative 2)	Alternative 5 (Low Carbon, Capping capacity of projects )	Alternative 6 (Low Carbon, Capping capacity of projects combined with WACM1)	Alternative 7 (Lightsource bp, TIA threshold at GSPs using Export Capacity)
Brian Hoy, Electricity North West	Y	Y	Y	Y	Abstain	Abstain	Y
Ciaran Fitzgerald/ Morgan Joyce , Scottish Power Renewables	Y	N	Y	N	Y	Y	Y
Richard Woodward, National Grid Electricity Transmission (nominated by NESO)	N	N	Y	N	N	N	Y
Drew Johnstone, Northern Powergrid	Not present	Not present	Not present	Not present	Not present	Not present	Y
Garth Graham, SSE Generation	Y	N	Y	N	Y	Y	Y
Grant Rogers, Qualitas Energy	Y	N	Y	N	Y	Y	Y
Helen Stack, Centrica	Y	Y	N	Y	N	N	Abstain
Jack Purchase, National Grid Electricity Distribution	Y	N	N	N	N	N	Abstain
Joe Colebrook, Innova Renewables	Y	Y	Y	Y	Y	Y	Not present
Kate Teubner, Low Carbon	Y	N	Y	N	Y	Y	N

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Kyran Hanks, WWA (nominated as a CUSC Panel Member)	Y	Y	Y	Y	N	N	Not present
Nina Sharma, Drax	Y	N	Y	N	Y	Y	N
Ross O'Hare, SSEN	Y	N	Y	N	N	N	Y
Zivanayi Musanhi/ Mohammed Bilal, UK Power Networks	Y	N	N	N	N	N	N
Martin Cahill, NESO	N	N	N	N	N	N	N
<b>Yes</b>	<b>12</b>	4	<b>10</b>	4	6	6	<b>7</b>
<b>No</b>	2	10	4	10	7	7	4
<b>Saved by Chair</b>	-	N	-	N	<b>Y</b>	<b>Y</b>	-
<b>WACM</b>	<b>WACM1</b>	-	<b>WACM2</b>	-	<b>WACM3</b>	<b>WACM4</b>	<b>WACM5</b>

## Stage 2a – Assessment against objectives

To assess the original and WACMs against the CUSC objectives compared to the baseline (the current CUSC).

You will also be asked to provide a statement to be added to the Workgroup Report alongside your vote to assist the reader in understanding the rationale for your vote.

ACO = Applicable CUSC Objective

"Y" = Yes

"N" = No

"-" = Neutral (Stage 2 only)

"Abstain"

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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Brian Hoy, Electricity North West					
<b>Original</b>	Y	Y	–	Y		Y
<b>WACM 1</b>	Y	Y	–	Y		Y
<b>WACM 2</b>	Y	Y	–	Y		Y
<b>WACM 3</b>	Y	N	–	N		N
<b>WACM 4</b>	Y	N	–	N		N
<b>WACM5</b>	Y	Y	–	Y		Y
<b>Voting Statement:</b>  <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 3 &amp; 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).</p> <p>Most options better facilitate ACO(b) as they remove costs and restrictions to 1-5MW projects that have marginal impact on the transmission network. WACMs 3 &amp; 4, in introducing a threshold add additional complexity and in particularly 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>						

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The Original, WACM1, WACM2 and WACM5 overall are supported but WACM3 and WACM4 are not due to the additional complexity and risks due to them not being fully assessed.

In terms of voting 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. WACM5 is a further enhancement of WACM1 in that it adds extra transparency for customers and therefore was seen as the best option. WACM5 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.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Morgan Joyce , Scottish Power Renewables					
<b>Original</b>	Y	Y	–	Y		Y
<b>WACM 1</b>	Y	Y	–	Y		Y
<b>WACM 2</b>	Y	Y	–	Y		Y
<b>WACM 3</b>	Y	Y	–	Y		Y
<b>WACM 4</b>	Y	Y	–	Y		Y
<b>WACM 5</b>	Y	Y	–	Y		Y

### Voting Statement:

Overall, we see this as a positive change which can better facilitate competition. It will give smaller generators, which may require shorter development timescales and have complex funding models, a more straightforward path to connection. This will increase the likelihood of these projects developing successfully and connecting, which brings additional competition.

Through the workgroup discussions, it has been discussed that the network impact will be minimal, due to the relatively small cumulative capacity of the projects that

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will benefit from the change. This will increase the efficiency of the process, by removing the obligation for NESO and the TOs to facilitate and carry out the TIA assessments for these projects. Resource freed up from this can then be utilised for the timely completion of the remaining TIA assessments.

**WACM 1** – We support for WACM1 as we believe that using ‘Export Capacity’ is more appropriate than Registered Capacity. This is because the power exported by the generator onto the network should never exceed the contracted export capacity, and therefore it is the more appropriate value to use. The registered capacity could be higher but would not be reflective of the power being exported onto the network.

**WACM 2/5** – We support WACM 2 and 5 as they look to address the complexity arising from the GSPs identified without fault level headroom. We think this is one of the biggest issues with the modification, so this provides some mitigation against the confusion and challenges that the ‘exceptions to the rule’ could bring. Our preference of the two is WACM 5 as it uses export capacity.

**WACMs 3/4** – A number of risks have been identified during the workgroup discussions that arise if there is too much capacity which does not need to go through the TIA process. This will be exasperated if developers manipulate the system by getting multiple connections or using others means, as a way of avoiding the time and cost associated with TIAs. Workgroup members have stressed their concerns that this is a real and active risk, hence there is an need to provide mitigations. WACM 4 attempts to address this risk and we believe it is a good mitigation and we support it. Of WACM 3/4, our preferred WACM is WACM4 as it combines the risk mitigation of WACM 3 with the use of export capacity in WACM1.

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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Dan Clarke, National Grid Electricity Transmission (nominated by NESO)					
<b>Original</b>	Y	Y	–	Y		Y
<b>WACM 1</b>	N	N	–	N		N
<b>WACM 2</b>	Y	Y	–	Y		Y
<b>WACM 3</b>	N	N	–	N		N
<b>WACM 4</b>	N	N	–	N		N
<b>WACM 5</b>	Y	Y	–	Y		Y

### Voting Statement:

As the Transmission Owner responsible for building and maintaining network infrastructure in England and Wales, we support the intent of CMP446 to apply a more proportionate consideration of potential network impacts for England & Wales embedded connection applications.

We believe that the original proposal and WACM2 (increase the TIA threshold to 5MW based on Registered Capacity) has a positive impact in respect of applicable Objective A and B.

These proposals ensure that embedded customers can avoid the added complexity of pursuing a TIA with NGET, which may/may not lead to substantive works, whilst enabling NGET to deploy its engineering and contracting resource in a more effective manner. However, we do believe that there are some potential consequential impacts of applying the modification – not least the link to the Clean Power 2030 action plan – which can be monitored post implementation.

In respect of the other WACMs proposals (which refers to Export Capacity instead of Registered Capacity for the TIA level) – we believe this could have a negative consequence on the facilitation of the applicable objectives. We believe that it will have a greater consequence on the transmission system as Embedded Power



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Stations with installed capacity greater than the threshold will not be included within the fault level assessments and this could lead to under-investment or sub-optimal timing of investments.

In terms of voting preference, the Original is preferred over the others. In particular, with the number of GSPs where there are fault level issues identified, this mitigates the risk to the system of using Export Capacity. As an alternative to the Original, WACM2 is also a solution supported.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Drew Johnstone, Northern Powergrid					
<b>Original</b>	Y	Y	–	Y		Y
<b>WACM 1</b>	Y	Y	–	Y		Y
<b>WACM 2</b>	Y	Y	–	Y		Y
<b>WACM 3</b>	Y	N	–	–		N
<b>WACM 4</b>	Y	N	–	–		N
<b>WACM 5</b>	Y	Y	–	Y		Y

### Voting Statement:

**Original Proposal:** We believe that the original proposal will positively impact applicable objectives (a) and (b). However, all five proposals are neutral concerning Applicable Objective (c).

**WACM1:** In our view, this is an enhancement of the original proposal as Export Capacity better reflects the potential network effects on existing systems, determining if a TIA is required or not. Therefore, it better facilitates applicable objectives (a), (b), and (d), making it overall positive.

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**WACM2:** Again, we believe that this proposal enhances the original proposal by providing enhanced transparency regarding GSP data. This results in more efficient network use and better facilitates applicable objectives (a), (b), and (d), making it overall positive.

**WACMs 3 & 4:** These proposals are identical except for the use of Registered Capacity vs. Export Capacity, so we have assessed them collectively. Although WACMs 3 & 4 aim to mitigate the potential risk of foreseen customer behaviour, they introduce an arbitrary threshold that has not been fully considered due to the urgency of this proposal. Therefore, they are negative concerning Applicable Objective (a), making both WACMs 3 and 4 negative.

**WACM5:** We believe that this proposal is a further enhancement to both WACM1 and WACM2, sharing all their benefits. Additionally, this proposal provides the option for NESO to change the thresholds at each GSP, mitigating the impact of any negative change in customer behaviour should it materialize, unlike the arbitrary cap proposed by WACMs 3 & 4. Hence, it is overall positive and deemed the best overall solution.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Andrew Colley, SSE Generation					
<b>Original</b>	Y	Y	–	Y		Y
<b>WACM 1</b>	Y	Y	–	Y		Y
<b>WACM 2</b>	Y	Y	–	Y		Y
<b>WACM 3</b>	N	Y	–	–		N
<b>WACM 4</b>	N	Y	–	–		N
<b>WACM 5</b>	Y	Y	–	Y		Y
<b>Voting Statement:</b>						
The case for the <u>Original</u> has been set out by the Proposer and from the deliberations within the Workgroup (as well as taking into account the responses						

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to the Workgroup consultation) it is clear that this change, if approved, will be positive in terms of Applicable Objectives (a), (b) and (d). Overall, this is a positive change.

Likewise, WACM1 (which I proposed) has all these positive attributes (that the Original has) which are (in my view) enhanced by being based on the 'Export Capacity' rather than 'Registered Capacity' which better reflects the potential network effects (from a planned new connection to the distribution system) which warrants a TIA being required. Overall, this is a positive change.

WACM2 has all the Original's positive attributes, with the further enhancement of improved transparency of the GSP data. As has already been established (beyond contestation) transparency of energy data will result in a more efficient network and better outcomes for end consumers. Therefore, this WACM better facilitates Applicable Objectives (a), (b) and (d). Overall, this is a positive change.

WACM5, as a combination of WACM1 and WACM2, has all the positive attributes of the Original proposal, and, in addition, all the benefits of 'Export Capacity', better reflecting potential network effects which warrants TIA requirement; as well all the benefits of improved transparency of the GSP data. Therefore, this WACM better facilitates Applicable Objectives (a), (b) and (d) and, overall, is a positive change.

WACMs 3 and 4 are near identical, except for the treatment of 'capacity' ('Registered' v 'Export') and I have considered them together (as the 'capacity' difference does not, in my view, outweigh the negative aspects of the core of these two proposals).

In my view the limitations, per GSP, will negatively impede *'the efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence'* and thus these two WACMs are negative in terms of Applicable Objective (a).

However, these two proposals do have positive merits in terms of Applicable Objective (b) (that are at least equal to the Original, plus WACMs 1 and 2) whilst being neutral in terms of (d).

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Overall, WACMs 3 and 4 are negative.

For the avoidance of doubt, all five options (Original plus the four WACMs) are neutral in terms of Applicable Objective (c).

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Grant Rogers, Qualitas Energy					
<b>Original</b>	Y	Y	–	Y		Y
<b>WACM 1</b>	Y	Y	–	Y		Y
<b>WACM 2</b>	Y	Y	–	Y		Y
<b>WACM 3</b>	Y	Y	–	Y		Y
<b>WACM 4</b>	Y	Y	–	Y		Y
<b>WACM 5</b>	Y	Y	–	Y		Y

### Voting Statement:

I believe the original and WACM's facilitated the objectives outlined.

The principle of allowing smaller scale generation (sub 5mW) at lower voltages access to connections without the need for a lengthy TIA process is a positive one. There are concerns about the effect of this if adopted on a mass scale (cumulative effect) or the system being gamed by larger scale connections however this has been covered within the WACM's (WACM 4 I believe) and is supported as our preferred overall option.

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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Helen Stack, Centrica					
<b>Original</b>	Y	Y	Y	Y		Y
<b>WACM 1</b>	Y	Y	Y	Y		Y
<b>WACM 2</b>	N	N	N	N		N
<b>WACM 3</b>	N	N	N	N		N
<b>WACM 4</b>	N	N	N	N		N
<b>WACM 5</b>	N	N	N	N		N

### Voting Statement:

I believe both **WACM1** and the **Original** better facilitate all ACOs and therefore also facilitate the objectives overall.

I believe **WACM1** best meets the applicable CUSC objectives.

**Original** – I believe ACOs (a) and (d) are better delivered by increasing the efficiency of the connections process and freeing up NESO and network time to focus efforts on projects that have a more significant impact on the Transmission System.

I believe ACO (b) is better facilitated by enabling a wider range of generation participants into the market – notably smaller parties, new-entrants and community energy. As demand sites looking to self-generate will be a key beneficiary, the Original will also facilitate competition in the supply market.

I've also marked ACO (c) as positive as it removes a disincentive to the development of self-generation assets on industrial and commercial and public sector sites seeking to reduce their energy costs and decarbonise. The current 1MW threshold is a barrier to these types of projects.

**WACM1** – I believe WACM1 better facilitates the ACOs for the same reasons as for the Original, but the benefits are enhanced. The difference is that by referencing

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Export Capacity WACM1 provides small sites to make more efficient design decisions – especially demand sites looking to add behind-the-meter generation.

**WACM2** – I believe WACM2 fails to address the defect by removing the ‘hard coding’ of a MW value for a TIA threshold from the CUSC. This means WACM2 is potentially worse than the Baseline. Additionally, it adds uncertainty and the risk that NESO could change a GSP TIA threshold at any time and for any reason.

I support increasing transparency of TIA thresholds at GSPs and suggest NESO publishes the table of data described in WACM2 as part of its implementation of the Original or WACM1, for the purpose of showing where fault level headroom impacts the threshold. I believe NESO would be required to publish that data under Ofgem’s Data Best Practice Guidance.

**WACM3** – My concern with WACM3 is that it overly limits the potential for CMP446 to deliver the Connections Action Plan (CAP) action aimed at accelerating connection timescales for distribution customers, where the focus was on smaller projects key for decarbonisation and growth that have minimal impact on the Transmission System. Any temporary improvement WACM3 could provide under ACO (b) by allowing some queued 1-5 MW projects to connect earlier is outweighed by the application of the arbitrary 25 MW cap to those that follow. Especially as that cap could be reached quickly. I believe concerns around gaming are overstated, mainly because project economics would be severely impacted if developers try to divide standalone larger merchant projects into 5MW parcels that have sufficient physical separation to qualify. Any concerns that the 5MW threshold could be abused would be better dealt with outside of CUSC via NESO and DNO guidance on what constitutes a separate 5MW project.

I believe WACM3 is negative for ACOs (a) and (d) due to the additional complexity it adds, whilst the cap limits the potential to address to defects that the Original seeks to remedy.

**WACM4** – As for WACM3. I support the addition of ‘Export Capacity’ from WACM1, but this does not outweigh the disadvantages of WACM3.

**WACM5** – As for WACM2. I support the addition of ‘Export Capacity’ from WACM1, but this does not outweigh the disadvantages of WACM2.

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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Jack Purchase, National Grid Electricity Distribution					
<b>Original</b>	Y	Y	–	Y		Y
<b>WACM 1</b>	Y	Y	–	Y		Y
<b>WACM 2</b>	N	N	–	N		N
<b>WACM 3</b>	N	N	–	N		N
<b>WACM 4</b>	N	N	–	N		N
<b>WACM 5</b>	N	N	–	N		N
<b>Voting Statement:</b>  <p>We believe that WACM1 provides the best overall option for CMP446 since this will benefit the greatest number of customers, including high users of electricity looking to install generation behind an existing meter.</p> <p>Whilst we support the intent of WACM2 we feel that this isn't the appropriate place for it to be raised, it should be incorporated as part of the improvement to data visibility overall. It is important that data offered by NESO aligns with that offered by DNOs and TOs. We would like to see it afforded more time and further development.</p> <p>We cannot support WACM3, 4 or 5 as we do not feel these have been considered adequately in the time available and as such it would be inappropriate for them to form part of the solution. We also have concerns regarding the proposed threshold and the impact on commercial markets when each 5 year period ends.</p>						

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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Joe Colebrook, Innova Renewables					
<b>Original</b>	Y	Y	–	Y		Y
<b>WACM 1</b>	Y	Y	–	Y		Y
<b>WACM 2</b>	Y	Y	–	Y		Y
<b>WACM 3</b>	Y	Y	–	Y		Y
<b>WACM 4</b>	Y	Y	–	Y		Y
<b>WACM 5</b>	Y	Y	–	Y		Y
<b>Voting Statement:</b>  <p>I believe the original and all WACMs meets Objective a) as they will provide a more efficient Transmission/Distribution interface which will help the efficient discharge of network licence obligations (NESO, NGET and DNOs) by reducing the administrative burden on networks for projects that have limited impact on the transmission system.</p> <p>The Original and all WACMs meets Objective b) as it will allow quicker connections for viable projects needed to deliver Net Zero. Currently project developers are waiting to connect due to the requirement to go through a Transmission Impact Assessment (TIA) even though the project has limited impact on the transmission network, and this is hindering progress to deliver Net Zero.</p> <p>Objective c) is neutral as the baseline, the original and all WACMs comply with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.</p> <p>The Original and all WACMs better facilitate Objective d) as the existing process creates ambiguity due to the poorly defined Transmission Impact Assessment (TIA) threshold. The Original and all WACMs provide greater clarity for networks and embedded generators.</p>						



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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Kate Teubner, Low Carbon					
<b>Original</b>	N	N	-	-		N
<b>WACM 1</b>	-	Y	-	Y		Y
<b>WACM 2</b>	Y	N	-	N		N
<b>WACM 3</b>	Y	Y	-	Y		Y
<b>WACM 4</b>	Y	Y	-	Y		Y
<b>WACM 5</b>	Y	N	-	N		N

### Voting Statement:

We believe that the best solutions are those that either impose a limit or leave the option for a limit to be implemented if an impact is made on the Transmission network.

- A) This is better facilitated by proposals that either limits or can limit the number of projects/MWs connecting in a certain area.
- B) Solutions where a limit to the number of 1-5MW schemes is set for each GSP help to mitigate the risk that the Transmission network may be impacted should an influx of new 1-5MW connection applications be submitted. Without this, there is a possibility that investor confidence for existing accepted to connect >5MW connections and therefore disadvantage them.
- C) All proposals are neutral as they neither worsen or better facilitate the objective.
- D) This objective is better facilitated by the proposals (WACM3 & 4) that clearly set out additional rules (i.e. a cap) for Distribution Network Operators to manage. In addition, it would likely be easier to raise a future Code Modification if the 25MW threshold per GSP per 5 year period was already in the CUSC

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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
	Kyran Hanks, WWA (nominated as a CUSC Panel Member)				
<b>Voting Statement:</b>					
Did not attend the Workgroup Meeting on 26 February 2025 when the Workgroup Vote was completed					

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
	Nina Sharma, Drax				
<b>Original</b>	Y	Y	-	-	Y
<b>WACM 1</b>	Y	Y	-	Y	Y
<b>WACM 2</b>	-	Y	-	N	N
<b>WACM 3</b>	Y	N	-	-	N
<b>WACM 4</b>	Y	Y	-	-	Y
<b>WACM 5</b>	-	Y	-	N	N
<b>Voting Statement:</b>  We support the view that increasing the lower threshold from 1MW to 5MW in England and Wales would support the acceleration of projects moving through the connections process. Our preference is that the threshold should be equal with for Scotland should be codified and the threshold equalised to ensure a level playing field nationally.  Against AO(a) we assess the impact of the original solution as neutral as there has been little assessment to mitigate the option for projects to use this change as a loophole, to get a project through the connections process that has previously not met the Clean Power 2030 criteria; such as by splitting a larger project into a number of smaller Distribution connections at less than the 5 MW threshold, e.g.					

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splitting a 25MW project into five separate 5MW Distribution connections. With this risk not being fully considered, we do not consider AO (a) to be better facilitated compared to the baseline.

We consider AO(b) to be positive as this increase encourages a quicker connections process for viable projects needed to deliver Net Zero for the original solution and WACMs (except for WACM3). We judge that AO(c) is neutral for all solutions. For AO(d) we also consider the original proposal is neutral as it does remove the need for smaller projects to undergo a TIA however, there is little evidence to suggest that these proposals will increase efficiency if projects split a larger project into smaller projects.

We consider the use of export capacity as a preferred option compared to the original proposal of installed capacity and retain this view across the WACMs.

While we are supportive of opportunities to increase transparency as proposed in WACM2 and WACM5, the urgent timeline and implementation may not be practical and therefore, WACM1 is better suited to govern any potential changes in the future to thresholds.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Ross O'Hare, SSEN					
<b>Original</b>	Y	Y	–	Y		Y
<b>WACM 1</b>	Y	Y	–	Y		Y
<b>WACM 2</b>	Y	Y	–	Y		Y
<b>WACM 3</b>	Y	N	–	N		N
<b>WACM 4</b>	Y	N	–	N		N
<b>WACM 5</b>	Y	Y	–	Y		Y
<b>Voting Statement:</b>						
SSEN Distribution feel the original solution better facilitates ACO (a), (b) and (d) as the change in TIA threshold offers a more efficient and effective solution. This will						

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lead to smaller projects connecting quicker, with Transmission resource being able to focus on larger projects, meeting ACO (a) and (d). By increasing the threshold, this will allow a wider range of projects to connect quicker without paying a fee or waiting for TIA works, including community generated projects, which meets ACO (b) of effective competition.

WACM 1 is our preferred solution as the definition of 'export capacity' is better suited to the TIA threshold increase than the original. We support this WACM for the same reasons as the original and against objectives (a), (b) and (d).

We support WACM 2 against ACO (a), (b) and (d) as having transparency at each GSP offers guidance for customers. This allows customers to see where fault level headroom affects a GSP, creating a more efficient and effective solution.

Overall, we do not support WACM 3 as feel against ACO (b), this does not offer effective competition. CMP446 was raised to help connect more projects but this WACM will limit the number of customers able to take advantage of this. Against ACO (d), WACM 3 does not promote efficiency in the TIA threshold as this could create more complexity in implementation. Additionally, with this code being raised urgently there has not been enough analysis on why 25MW is the most viable capacity at each GSP. This could alter across GSPs depending on network size and framework and so we are not in full support of this WACM. However, we believe the volume of connections under 5MW should be monitored closely after CMP446 is implemented to understand if there are any significant impacts on the Transmission network of this modification.

Similar to WACM 3, we are not in overall support of this WACM against ACO (b) and (d).

Similarly to WACM 2, we are in support for WACM 5 and feel it better facilitates ACO (a), (b) and (d).

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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Mohammad Bilal, UK Power Networks					
<b>Original</b>	Y	Y	–	Y		Y
<b>WACM 1</b>	Y	Y	–	Y		Y
<b>WACM 2</b>	Y	Y	–	Y		Y
<b>WACM 3</b>	Y	Y	–	Y		Y
<b>WACM 4</b>	Y	Y	–	Y		Y
<b>WACM 5</b>	Y	Y	–	Y		Y

### Voting Statement:

I believe that all solutions better facilitate ACO (a) by eliminating the need for an Evaluation for Transmission Impact Assessment (TIA) for smaller projects. 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 generation schemes with no transmission impact to connect to the network quicker driving down costs 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.

I consider **WACM1** to be more preferable.

The **Original** solution proposes to use Installed Capacity as a basis for establishing the TIA threshold. I 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

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lead to significant costs and long lead times for such projects which counteracts the objectives of this modification proposal.

I support transparency regarding TIA thresholds in GSPs across England and Wales as proposed by **WACM2** and **WACM5**. However, I believe that **WACM1** provides a more suitable level of governance for any future changes to these thresholds, ensuring a clearer and more consistent approach.

It is my 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, GC0139 proposes that DNOs/IDNOs forecast generation growth by technology type at each GSP. Should NGET or NESO deem that the increase in sub 5MW embedded connections impacts the transmission network, a subsequent CUSC modification can be raised to review the lower TIA threshold.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)		Overall (Y/N)
	Martin Cahill, NESO					
<b>Original</b>	Y	Y	–	Y		Y
<b>WACM 1</b>	N	Y	–	Y		N
<b>WACM 2</b>	Y	Y	–	Y		Y
<b>WACM 3</b>	Y	N	–	N		N
<b>WACM 4</b>	N	N	–	N		N
<b>WACM 5</b>	N	Y	–	Y		N
<b>Voting Statement:</b>						

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We believe that the Original solution and WACM2 will better facilitate the Applicable Objectives. These will both remove the need for a TIA for smaller projects, allowing these projects to connect quicker and help deliver Net Zero (Objective B) and improve the overall process by focussing assessment on projects which have a more significant impact on the Transmission System (Objective A). We believe there is also a positive impact of both on Objective D by increasing the efficiency of the connections process.

While we welcome the intention of the other WACMs, we cannot support any variant for a modification relating to Transmission impact which is not agreeable by the Transmission Operator. NGET are best placed to agree what threshold is acceptable for these projects and have informed the workgroup that the threshold should in their view be based on Registered Capacity. Therefore we believe that WACM 1, 4 and 5 are negative against Objective A and do not better facilitate the objectives overall.

We believe that WACM3 and WACM4 have a negative impact on Objective B as the cap would be breached by projects which are already in the Connections Queue, and any potential risk of increasing the threshold is more to do with newer projects/changes which are not yet in the queue. These WACMs add a significant amount of complexity in administering (Objective D) while any future increase in impact from connections in the 1 to 5MW range could be addressed by a future change. There is also an interaction with CP2030 buckets where a Power Station could miss out on the ability to go through without a TIA, but then also not be able to connect because CP2030 buckets are full.

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Of the 14 votes, how many voters said this option was better than the Baseline.

Option	Number of voters that voted this option as better than the Baseline
Original	13
WACM 1	12
WACM 2	10
WACM 3	5
WACM 4	6
WACM 5	9

## Stage 2b – Workgroup Vote

Which option is the best? (Baseline, Proposer solution (Original Proposal), WACM1, WACM2, WACM3, WACM4 or WACM5)

Workgroup Member	Company	Industry Sector	Best Option?	Which objective(s) does the change better facilitate?
Brian Hoy	Electricity North West	Network Operator	WACM5	a, b, d
Morgan Joyce	Scottish Power Renewables	Network Operator	WACM4	a, b, d
Dan Clarke	National Grid Electricity Transmission (nominated by NESO)	Offshore Transmission Licensee	Original	a, b, d
Drew Johnstone	Northern Powergrid	Network Operator	WACM5	a, b, d



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Andrew Colley	SSE Generation	Generator	WACM5	a, b, d
Grant Rogers	Qualitas Energy	Generator	WACM4	a, b, d
Helen Stack	Centrica	Generator	WACM1	a, b, c, d
Jack Purchase	National Grid Electricity Distribution	Network Operator	WACM1	a, b, d
Joe Colebrook	Innova Renewables	Generator	No preference	
Kate Teubner	Low Carbon	Developer - Generation	WACM4	a, b, c, d
Nina Sharma	Drax	Generator	WACM4	a, b
Ross O'Hare	SSEN	Network Operator	WACM1	a, b, d
Mohammad Bilal	UK Power Networks	Network Operator	WACM1	a, b, d
Martin Cahill	NESO	System Operator	Original	a, b, d