Public

CMP414 ‘CMP330/CMP374 Consequential Modification’

Workgroup 5 – 12 January 2026

Online Meeting via Teams

NESO
National Energy System Operator

WELCOME

Agenda

#	Topics to be discussed	Lead
1.	Welcome	Chair
2.	Objectives and Timeline	Chair
3.	Send Back issues - Actions Log update	Proposer
4.	Lack of clarity on risks of Sub-standard assets	Proposer
5.	Any Other Business	Chair
6.	Next Steps	Chair

Expectations of a Workgroup Member

- Contribute to the discussion
- Be respectful of each other's opinions
- Language and Conduct to be consistent with the values of equality and diversity
- Do not share commercially sensitive information
- Be prepared - Review Papers and Reports ahead of meetings
- Complete actions in a timely manner
- Keep to agreed scope
- Email communications to/cc'ing the .box email

Your Roles

- Help refine/develop the solution(s)
- Bring forward alternatives as early as possible
- Vote on whether or not to proceed with requests for Alternatives
- Vote on whether the solution(s) better facilitate the Code Objectives

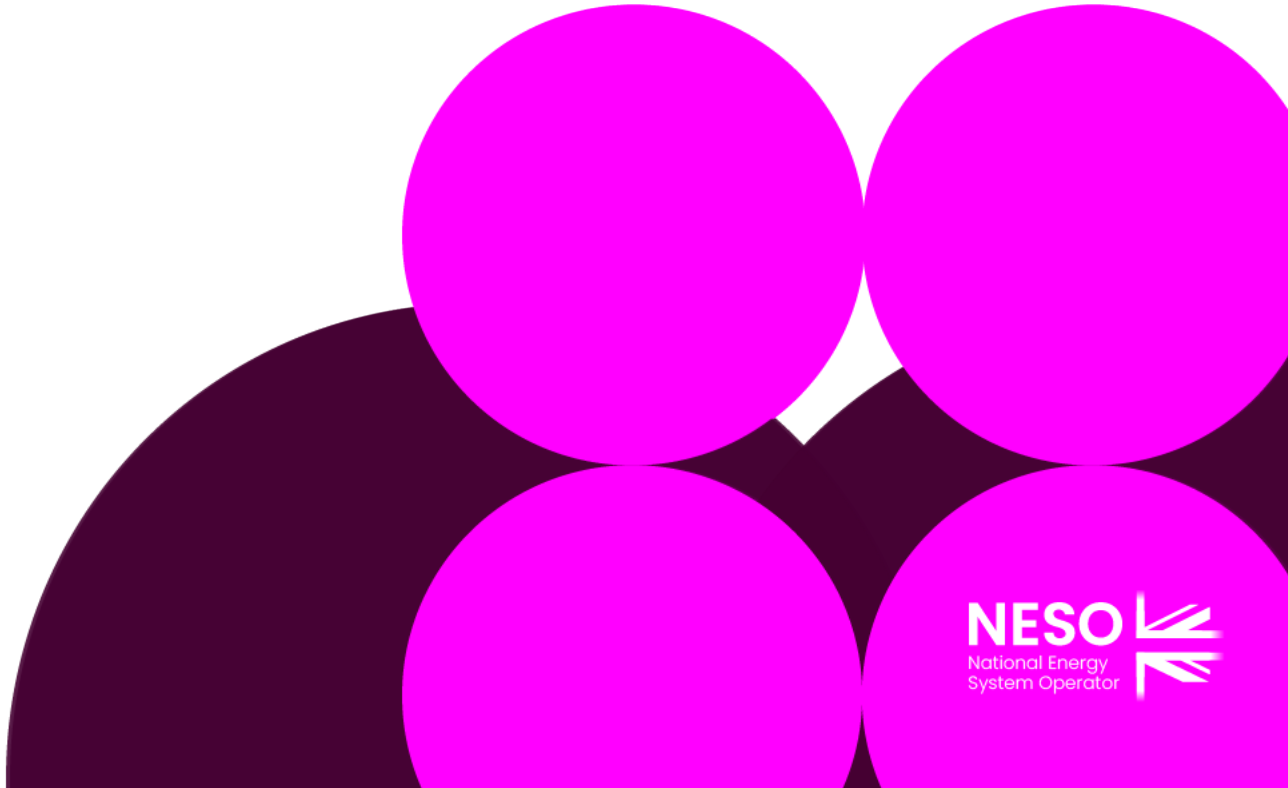
Timeline

Timeline for CMP414 as of 20 October 2025

Workgroups	
CMP414 Code Administrator Consultation	*01 June 2023 – 29 June 2023*
CMP414 Draft Final Modification Report to Panel	*20 July 2023*
CMP414 Final Modification to Ofgem	*10 August 2023*
Authority Send Back	*08 July 2024*
CMP414 Workgroup 1	*17 February 2025*
CMP414 Workgroup 2	*20 October 2025*
CMP414 Workgroup 3	*17 November 2025*
CMP414 Workgroup 4	*11 December 2025*
CMP414 Workgroup 5	12 January 2026
CMP414 Workgroup 6	19 January 2026
CMP414 Workgroup Consultation	26 January 2026 – 16 February 2026
CMP414 Workgroup 7	12 March 2026
CMP414 Workgroup 8	02 April 2026
CMP414 Workgroup 9	30 April 2026
CMP414 Workgroup 10	21 May 2026
CMP414 Workgroup Report to Panel	18 June 2026
Post Workgroups	
CMP414 2nd Code Administrator Consultation	29 June 2026 – 20 July 2026
CMP414 2nd Draft Final Modification Report to Panel	20 August 2026
CMP414 2nd Final Modification to Ofgem	10 September 2026
CMP414 Implementation Date	TBC

Send Back issues – Actions Log update

Neil Dewar – NESO



CMP414 – Action Update

Action	WG Raised	Owner	Action	Update
1	WG1	ND/MPS/AP	Obtain evidence from the ENA to obtain statistic on contestability	Closed
2	WG1	WG	Look into transmission regime for additional insights on managing substandard assets	Closed
3	WG1	RW	Ofgem to provide clarity on lack of analysis around incentives meaning	Open – Ongoing
4	WG2	All	Clarify the definition and scope of assets covered by CMP414, including examples and limitations for inclusion in the document	Ongoing – suggest discussion in next WG to be able to close this action down
5	WG2	All	Participate in fact finding to clarify the current status quo regarding ownerships and construction of transmission assets and align understanding between the Electricity Act, Licence Conditions, SQSS and CUSC	Ongoing

Action Update

Action	WG Raised	Owner	Action	Update
6	WG3	AP	Share the confidential cost benefit analysis from Energiekontor with the Workgroup, indicating which parts are confidential and can be included as a confidential appendix to the FMR	Ongoing – with AP and Energiekontor
6.1	WG3	ND	Investigate whether Eirgrid's previous cost benefit analysis on contestable works can be sourced and considered as part of the evidence base.	• Additional contacts from EirGrid found and email sent 15th December asking for a meeting wc 5 or 12 Jan. Awaiting responses
6.2	WG3	ND/AP MPS	Review available ENA data and independent analysis on financial and time-saving benefits.	ND to contact Scottish TO'S and set meeting up to understand what available evidence is available and can be shared – ongoing (email sent to SP 30 dec). (email to SSE 31 dec)
6.3	WG3	MPS	Provide a written note on the realistic scope and likely voltage levels of contestable works, especially regarding the rarity of long, high-voltage circuits in England and Wales	Closed

Action 6.1

Investigate whether Eirgrid’s previous cost benefit analysis on contestable works can be sourced and considered as part of the evidence base.

GB DNO example requirements

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Overview of works/items included within contestability

Contestable*	Non-contestable
1.Design of contestable works 2.Procurement/provision of equipment/materials 3.Preparation of site including circuit routes 4.Construction of contestable works 5.Connection of Extension Assets or diverted assets where the connection is made to an LV or HV underground cable 6.Recording of work done and provision of information to DNO 7.Provision of installation of metering equipment	**Existing system:** 1.Processing applications 2.Deciding point of connection 3.Connection of Extension Assets or diverted assets 4.Design, planning, specification and carrying out of reinforcement works **New system works:** 1.Specification of design and installation 2.Land rights/consents 3.Operation, repair and maintenance of plant and lines adopted 4.Inspection, monitoring and testing of works

*Must be done in accordance with approved design and specification

DNO technical requirements

The Contestable design element must comply with the appropriate part of Engineering Recommendation G81 and any other specific requirements

Following receipt of the design of the Contestable Work, DNO will approve or reject.

DNO can request additional features to be included in the design.

- Specifications for design, materials, installation and recording is governed by the Engineering Recommendation G81: 7 part national framework document administered by the ENA. Design can be supplemented by each DNO.
- G81 is broken down by three areas: Green field and brown field, industrial and commercial connections and divisionary and reinforcement works.

Inspection and monitoring

- DNOs inspect and monitor contestable connection projects
- Body undertaking contestable connections must complete a set number of projects without significant issues to move between levels of inspection
  - Successfully meeting standards means a part can move between levels
  - Failing means moving back levels.

Example of levels (P109 of Southern Electric Power Distribution methodology and charges for connection)

	Level 1	**Level 2**	**Level 3**
Low Voltage Inspection Level	40%	20%	2%
No of completed LV projects required to move to next Level	10	15	N/A
High Voltage Inspection Level	100%	50%	2%
No of completed HV projects required to move to next Level	5	10	N/A
Extra High Voltage Inspection Level	100%	100%	100%
No of completed EHV projects required to move to next Level	N/A	N/A	N/A

Public

EirGrid requirements

Irish contestability model

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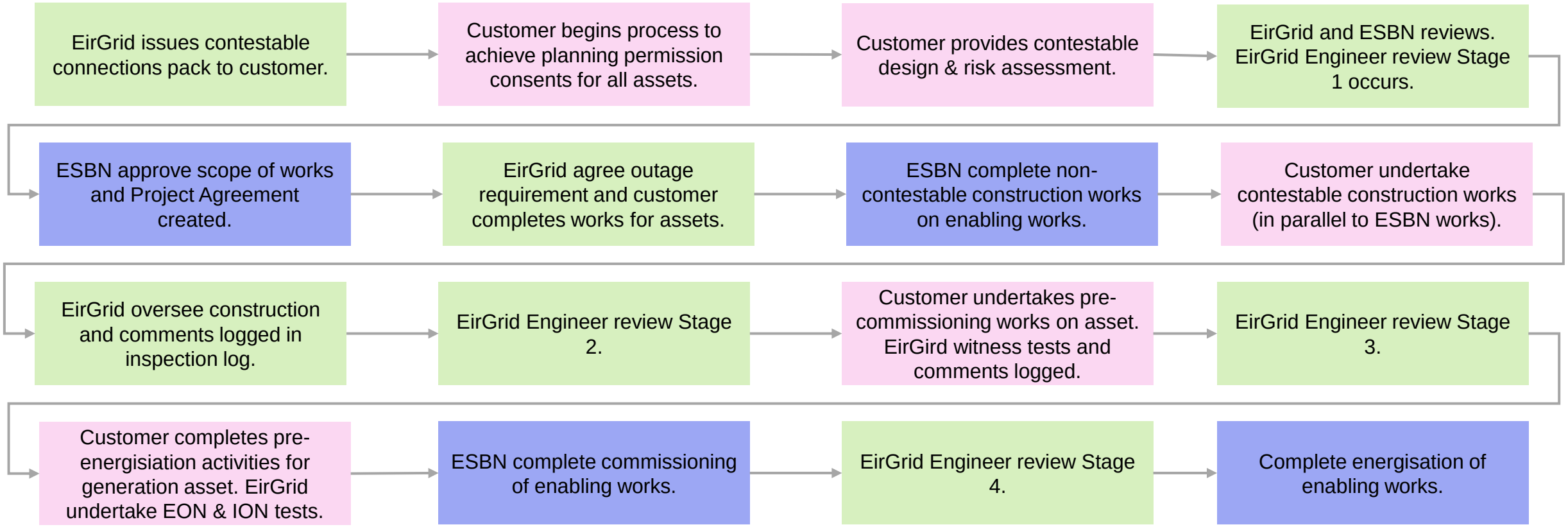
Illustrative overview of Irish model (some steps may occur in parallel)



Key
EirGrid: Transmission System Operator
ESBN: Transmission Asset Owner
Customer: Developer of contestable connection

Technical and asset transfer requirements

Contestable specification pack	• Functional specifications, standards and project specific specifications, policies and drawings • Technical parameters which all plants, equipment and installation practices must comply with • Client engineer will provide project specific requirements.
Contestable design review	• 3 designs required at following stages: 1) planning submission, 2) preliminary design and 3) detailed design • Design must be reviewed and approved by the EirGrid's client engineer • ESBN undertake a Due Diligence review following EirGrid review.
Quality assurance	• Customer must demonstrate that design, construction, testing and installation of any assets is safe and residual risks are identified to allow for safe energisation, operation and maintenance • Evidence provided in Asset Transfer folder.
Contestable construction / commissioning	• EirGrid provide oversight of physical construction of assets e.g. foundation and high voltage equipment installation • Customer must demonstrate Grid Code compliance to EirGrid • ESBN and EirGrid assess site and agree standards have been met before transferring asset to ESBN.

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Questions for workgroup members

1. Both SHED and NGED's Statement Of Methodology And Charges For Connections state that contestable connections cannot exceed 33kV. Previous workgroup discussions stated there is little opportunity for contestability in England and Wales as this already occurs at 132kV level. Could clarity be provided on this?

2. It appears that EirGrid permits contestability at all levels except 400kV. What are the challenges present in the GB electricity network that would prevent this from occurring above 33kV?

Action Update

Action	WG Raised	Owner	Action	Update
6.4	WG3	ND and DR	Explore the possibility of obtaining data on contestable connections directly from developers via industry associations such as Renewable UK, Scottish Renewables, and Solar UK, and report on feasibility and progress	• ND/DR presented to Scottish Renewables in Dec to request evidence – none provided so far. • ND to check with Ofgem to see if any evidence has been passed on a confidential basis • ND/DR to check with Scottish Renewables wc 5 Jan to see if any progress • ND /DR have a meeting with Renewables UK to discuss ask on 7 Jan
6.5	WG3	KE	Clarify what constitutes satisfactory empirical evidence for financial and time-saving benefits, including whether data from distribution contestability is available and relevant	Ongoing
6.6	WG3	MPS	Draft a written summary on the realistic scope and metrics for construction of sole use circuits over 2 kilometres at various voltage levels, including the likelihood and potential benefits, for consideration by the Workgroup	A written explanation for England and Wales – closing this element of action. However, ND WG have to investigate do similar for Scottish TO's – Ongoing – emails sent on 30/31 dec

Action Update

Action	WG Raised	Owner	Action	Update
7	WG3	ND/WG	Produce a risk register detailing risks and mitigations associated with substandard assets in contestable works, including consideration of legal and contractual protections, with input from the WorkGroup	• ND/DR to arrange a group call in Jan with WG members –
8	WG3	JO	Provide a summary of charging considerations and potential issues for contestable assets, especially regarding shared infrastructure and capital contributions	Ongoing
9	WG3	AP, MPS, ND	AP and MPS to work with ND on scenario analysis for anticipatory investment (AI), focusing on real-life examples and the impact on future network sharing	• No update on this – ongoing. • ND to set up a meeting with AP/WG members/ Scottish TO's for wc 5 / 12 Jan

Action Update

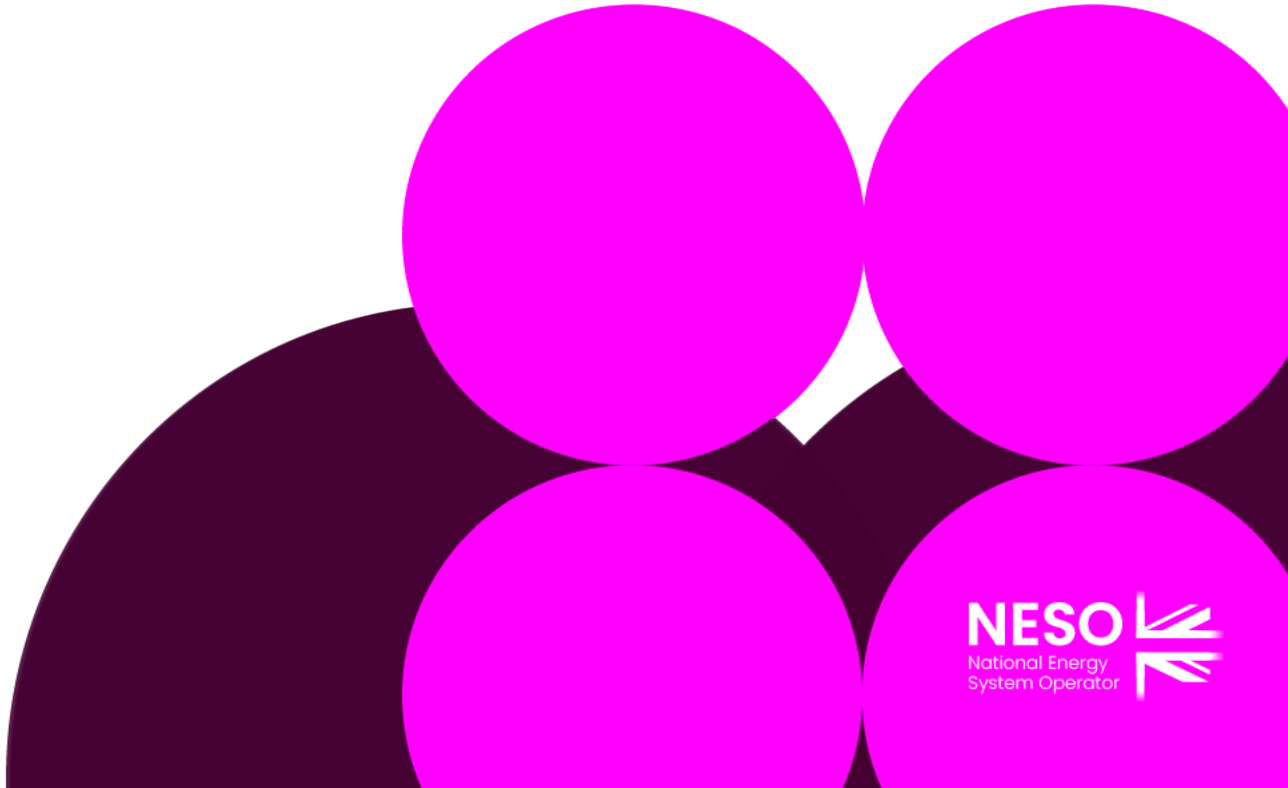
Action	WG Raised	Owner	Action	Update
10	WG3	ND/MPS	Review and align legal text between the CUSC and STC modifications, ensuring consistency in compensation and intervention clauses	• ND/ MPS had call with Steve Baker (SB) from NESO on how to deal with legal text discrepancies. • ND/SB to cross reference CUSC / STC legal texts and identify areas on 9 Dec • On review – no major issues have been identified • With NESO legal team for review – confirm position ahead of next WG
11	WG3	KE	Provide clarification on the Authority's expectations regarding TO and contractor incentives and how they relate to timeliness and quality of build. This to be part of general clarification on each of the send back points	
12	WG4	ND/RH	Reach out to Scottish Transmission Owners (TOs) to seek their involvement in the Workgroup and request their engagement and evidence for the process	Ongoing - Awaiting response – emails have been sent by RH/ND

Action Update

Action	WG Raised	Owner	Action	Update
13	WG 4	ND	Check with SONI (System Operator for Northern Ireland) to see if they could share information or have access to the CBA (Cost Benefit Analysis), as they might use similar contestability criteria as EirGrid and could have relevant data	DR sent email to SONI on 15 Dec – awaiting response 5 Jan
14	WG 4	RH	Circulate MPS written summary to the Workgroup in closing Action 6.3, and for the England and Wales element of Action 6.6	Complete

Lack of clarity on risks of Sub-standard assets

Neil Dewar – NESO



Lack of clarity on risks of Sub-standard assets

Draft risk register template

Risk	Mitigation	Like-lihood (H/M/L)	Impact (H/M/L)

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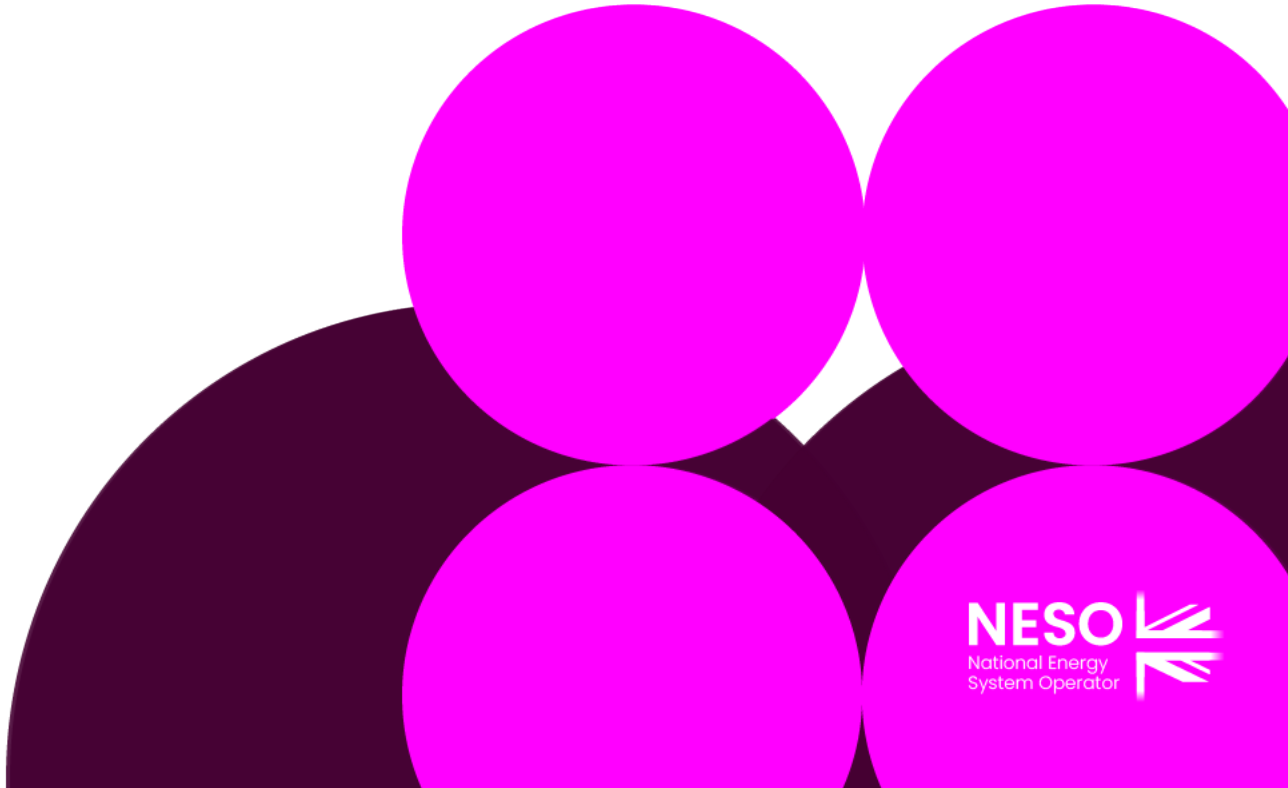
Any Other Business

Robert Hughes – Workgroup Chair



Next Steps

Robert Hughes – Workgroup Chair