Public

CMP414 ‘CMP330/CMP374 Consequential Modification’

Workgroup 8 – 16 March 2026

Online Meeting via Teams

NESO
National Energy System Operator

WELCOME

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

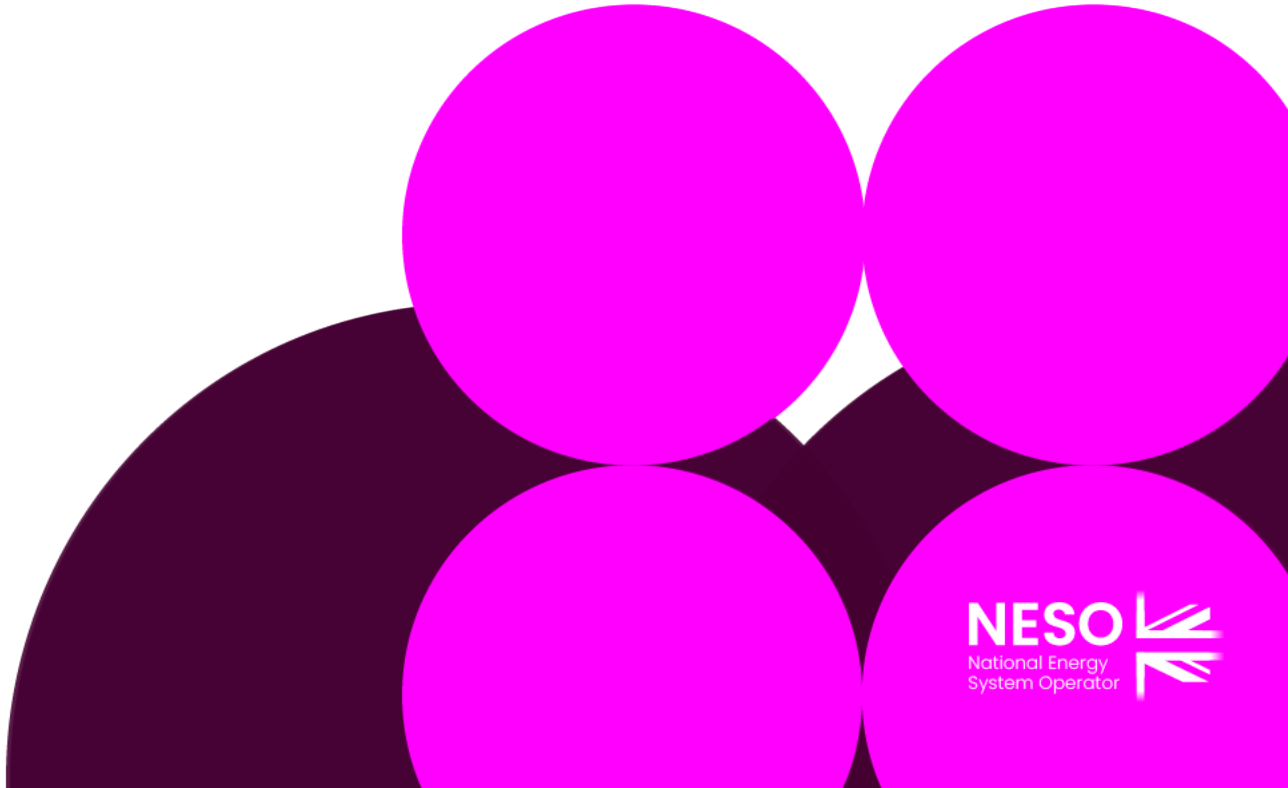
- Help refine/develop the solution(s)
- Bring forward alternatives as early as possible
- Vote on whether or not to proceed with requests for Alternatives
- Vote on whether the solution(s) better facilitate the Code Objectives

Agenda

#	Topics to be discussed	Lead
1.	Welcome	Chair
2.	Objectives and Timeline	Chair
3.	Overview of contestability in Ireland	Stacy Feldmann
4.	Legal text	Proposer
5.	Send Back issues - Actions Log update	Chair
6.	Terms of Reference	Chair
7.	Any Other Business	Chair
8.	Next Steps	Chair

Objectives and Timeline

Robert Hughes – Workgroup Chair



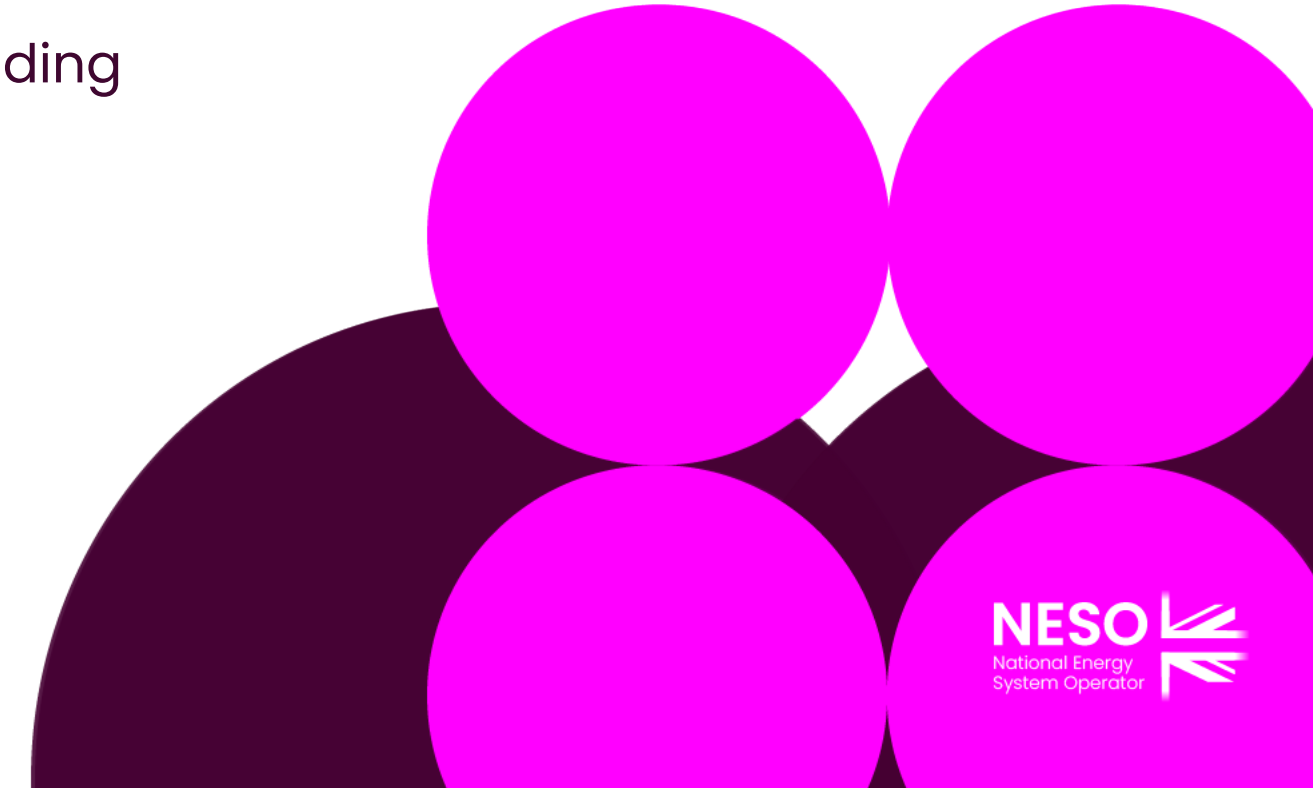
Timeline

Timeline for CMP414 as of 02 March 2026

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	*02 February 2026*
CMP414 Workgroup 7	*02 March 2026*
CMP414 Workgroup 8	16 March 2026
CMP414 Workgroup 9	23 March 2026
CMP414 Workgroup Consultation	27 March 2026 – 21 April 2026
CMP414 Workgroup 10	30 April 2026
CMP414 Workgroup 11	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

Overview of contestability in Ireland

Stacy Feldmann – ESB Generation and Trading



Energy for generations

Overview of contestability in Ireland

Stacy Feldmann

ESB

Agenda

Set out the landscape

Try to provide details on the quantitative and qualitative benefits of contestability given ESB's experience

Try to provide insight into the process

Context for contestability in Ireland

The Republic of Ireland's contestability model has been successfully employed since 2000

Contestability in ROI is underpinned by Section 34 of the Electricity Regulation Act 1999, as amended by Statutory Instrument (S.I) No. 445 of 2000 and Statutory Instrument (S.I.) No. 226 of 2009.

Developers in ROI can construct connection works, while the TSO (EirGrid) and TAO (ESB Networks) retain control over connection method, system-routing, and transfer rules.

Contestability is supported by detailed technical standards and commissioning specifications (bibliography of key documents is listed in the last slide)

Contestability also has well-understood roles and responsibilities, most specifically identifiable with land consents and wayleaves.
-ESBN and EirGrid will adopt lines
-they set out clear minimum criteria for completion of contestable works
-CRU has power to allow for the transfer of ESBN powers for land access for developers to complete contestable works

Questions which drove our analysis

1. Can we quantify or qualify the impact of contestability in Ireland to support CMP414 for GB?
2. Can we demonstrate speed and cost savings?
3. Can we provide details on the policy and framework in Ireland that governs contestability?

Quantitative case study

Considering the BAFO prices from ESB's recent experience, contestability can provide cost and savings:

Cost

- 20% in cost savings for a developer for a standard 110 kV loop-in connection compared to current EirGrid cost methodology (Cost and rebating methodology under ECP-GSS)

Time

Considering the timelines of two of our existing projects , we were able to provide some learnings in terms of speed of connections with contestability included

- The Irish Regulator CER/CRU set out the standard trasnmission timeline for EirGrid's connection offers in 2009 in the CER09077 decision. At the time, the standard lead time for a 110kV loop was considered to be 35 months.
- Considering this against recent projects ESB has completed we estimate a saving of between 5 and 11 months compared to the CRU standard timelines (depending on planning complexities)
- For planned future projects, contestability could reduce delivery timelines by up to 11 months (we assume a 24-month lead time)

Qualitative Benefits and challenges

Benefits

a) Greater Flexibility and Control: Contestability has enabled developers to manage design and construction, enabling tailored solutions.

b) Cost Efficiency and Faster Delivery: Competitive procurement and parallel processes has reduced costs and accelerated timelines for developers seeking to connect.

c) Innovation and Market Development: Contestability fosters competition among contractors, encouraging technical innovation.

d) Alignment with Policy Goals: When well-integrated, contestability can support renewable targets and system expansion objectives.

Challenges

- Coordination amongst multiple parties can be fragmented
- Grid reinforcement lead times
- Asset transfer can be delayed
- Charging and rebating rules can be challenging (currently not fully resolved in Ireland under connection policy framework)

Bibliography of links (frameworks for ensuring standard of work and high adoption rate)

contestability paper oct 2007 16-10-07.doc --details of contestability--EirGrid

Connection Asset Costs: Guiding Principles —principles around charging

Microsoft Word - Contestable builds and financing of SO Preferred Connection Method - For Consultation .docx CRU initial principles

Microsoft Word - Contestability for Distribution Decision paper cer-10-056 15-04-10.docx CRU decision on contestability

Contestability-and-Connection-Assets.pdf initial 2002 principles for contestability—when contestability was first established in ROI.

Distribution Department ESBN contestability guide 2010

Contestability-Guidelines-Version-2-2016-05-30_SONI contestability guide

https://cms.eirgrid.ie/sites/default/files/publications/Onshore-Getting-Connected-Document-V1-September-2025.pdf connection guide EirGrid

Microsoft Word - Joint DSO-TSO GPA Pricing Paper Final 27-02-07_2_.doc pricing framework

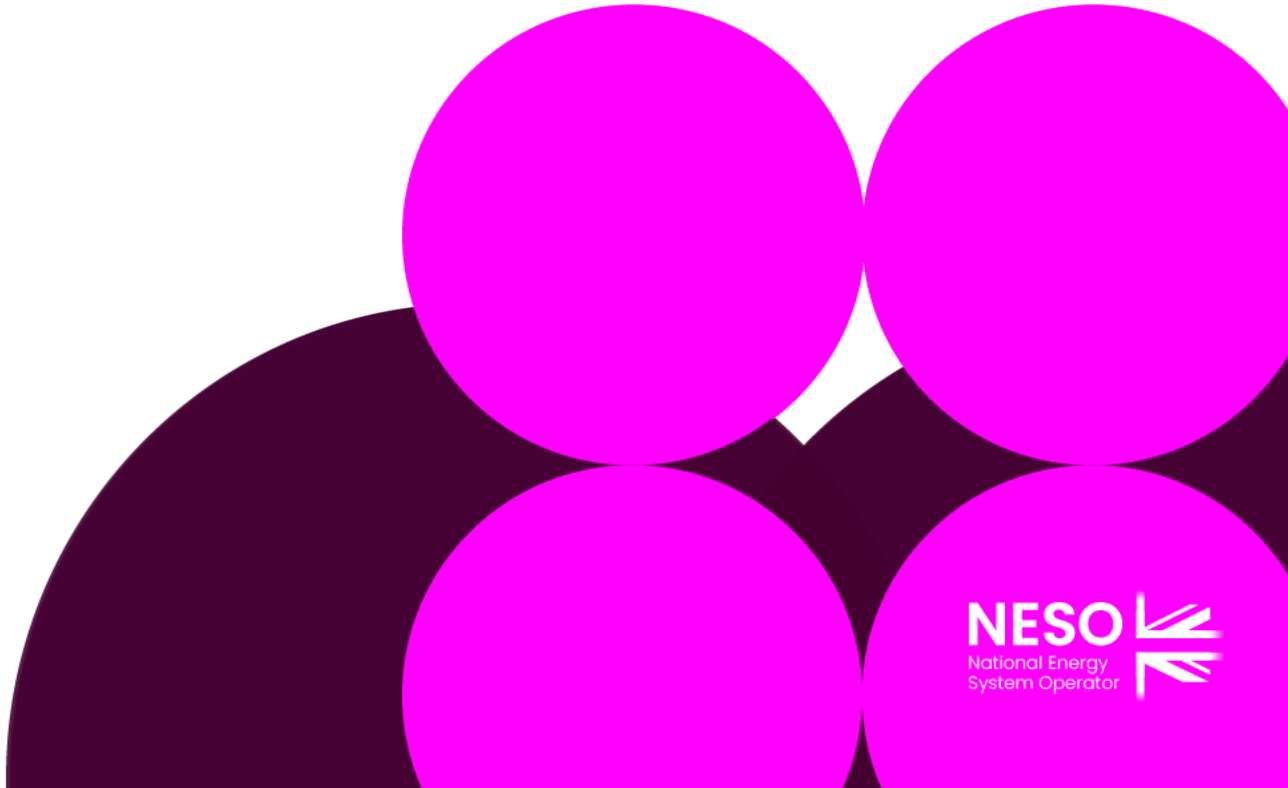
Questions?

Energy for generations

Legal text

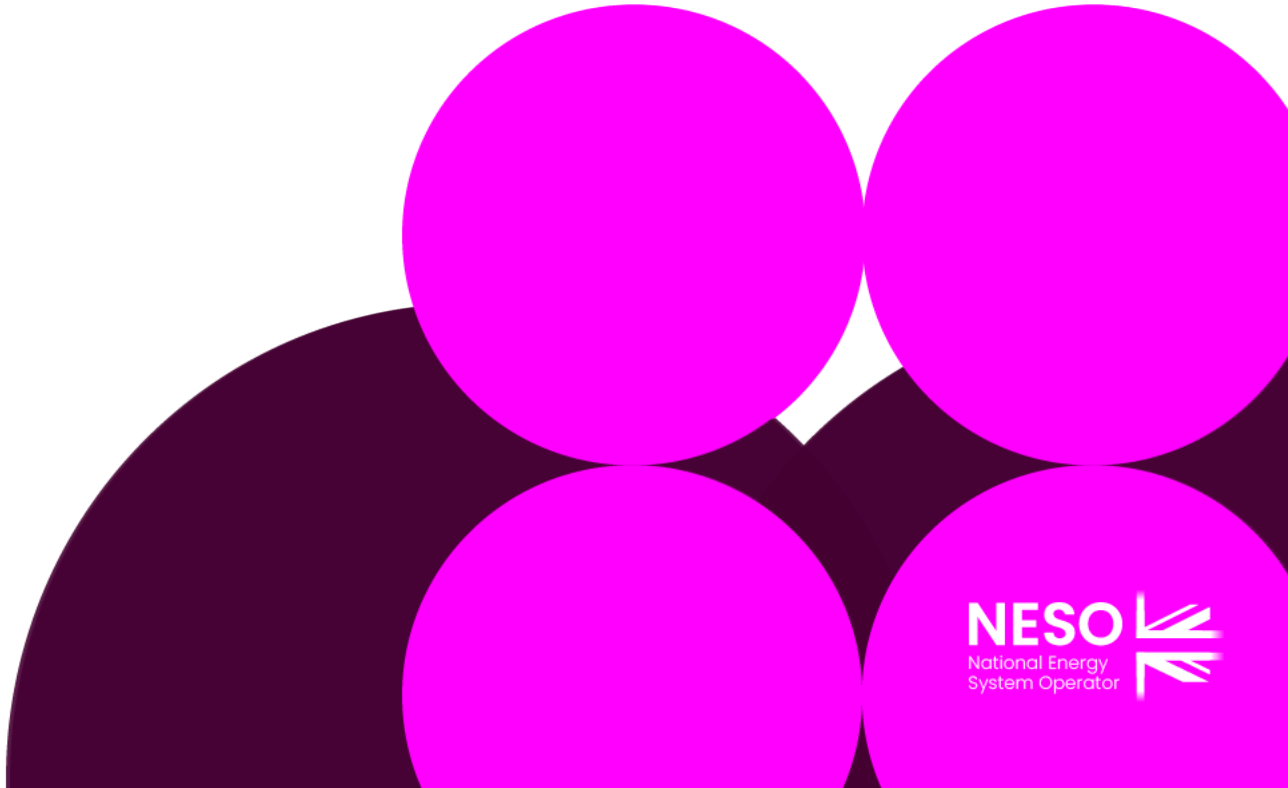
(Files circulated with papers)

Neil Dewar – NESO



Send Back issues – Actions Log update

Neil Dewar – NESO



CMP414 – Action Update

Action	WG Raised	Owner	Action	Update
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
6.8	WG5	MH/NG	Supply Cost Benefit data to broaden the evidence base, on additional costs and experiences from their respective organisations the Workgroup Consultation report.	
6.9	WG5	KE	To confirm if any developers have been in direct contact with Ofgem regarding contestable connections.	
6.11	WG7	LA	Circulate analysis on contestability impacts.	
6.12	WG7	MH	Circulate analysis undertaken for Action 6.8.	

CMP414 – Action Update

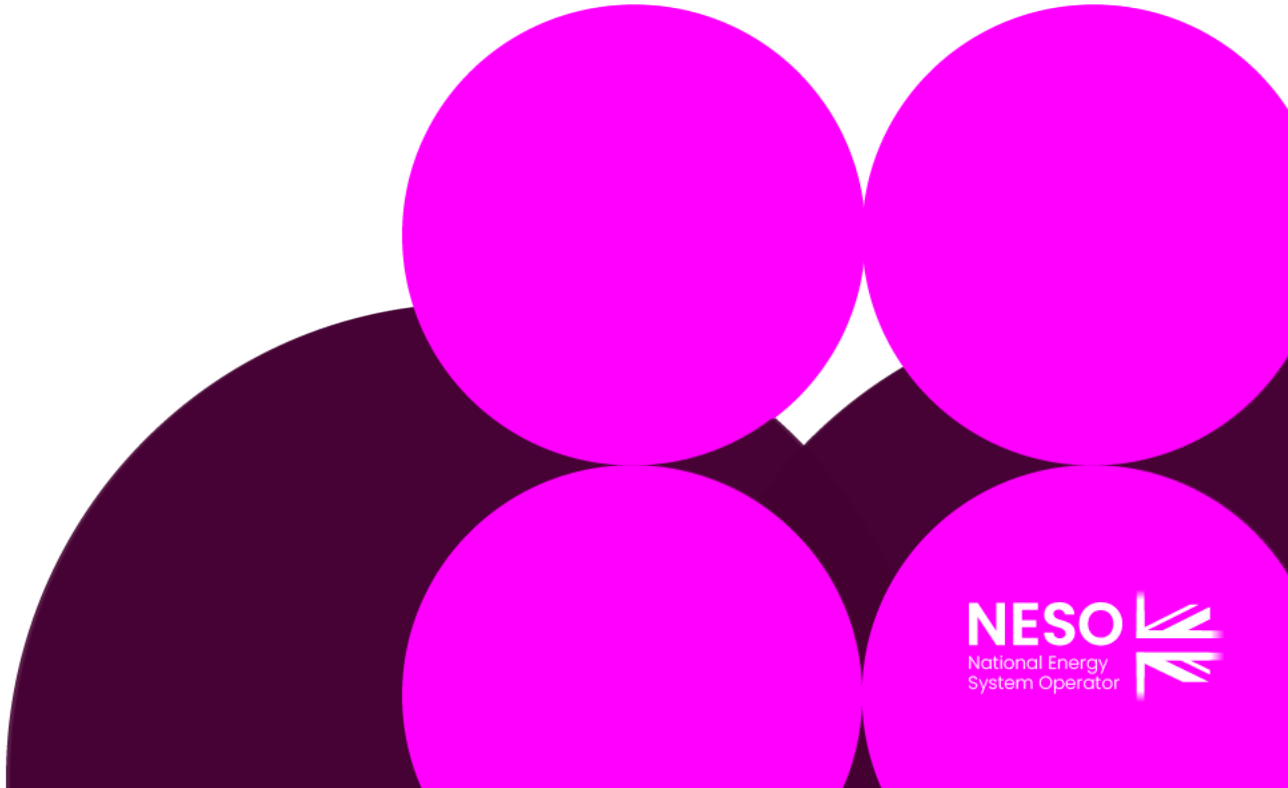
Action	WG Raised	Owner	Action	Update
7	WG3	ND/WG	Produce a risk register detailing risks and mitigations associated with substandard assets in contestable works, including consideration of legal and contractual protections, with input from the Workgroup	To be reviewed periodically and to be added to when required.
7.1	WG6	KE	Provide feedback on whether additional legal text is required to address substandard assets and clarify if this should be included in adoption agreements or elsewhere.	
7.2	WG6	KE	Clarify why the regulator's approach to contestability differs between distribution and transmission, referencing previous competition in connections experience.	
7.3	WG6	KE	Clarify whether obligations to ensure asset quality in contestable arrangements should be addressed in party Licenses rather than solely in the CUSC.	
8.1	WG6	ND	Consult with NESO revenue and charging teams to clarify TNUoS when sole use infrastructure assets become shared after the fact.	Ongoing – with NESO revenue team and under investigation.
8.2	WG6	JO	Request data from Renewable UK and other trade bodies regarding cost escalation seen by developers from the TOs for inclusion in the Workgroup Report.	

CMP414 – Action Update

Action	WG Raised	Owner	Action	Update
9.1	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	Ongoing - ND to set up call with WG members in March – Discuss at WG
10.1	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

Terms of Reference

Robert Hughes – Workgroup Chair

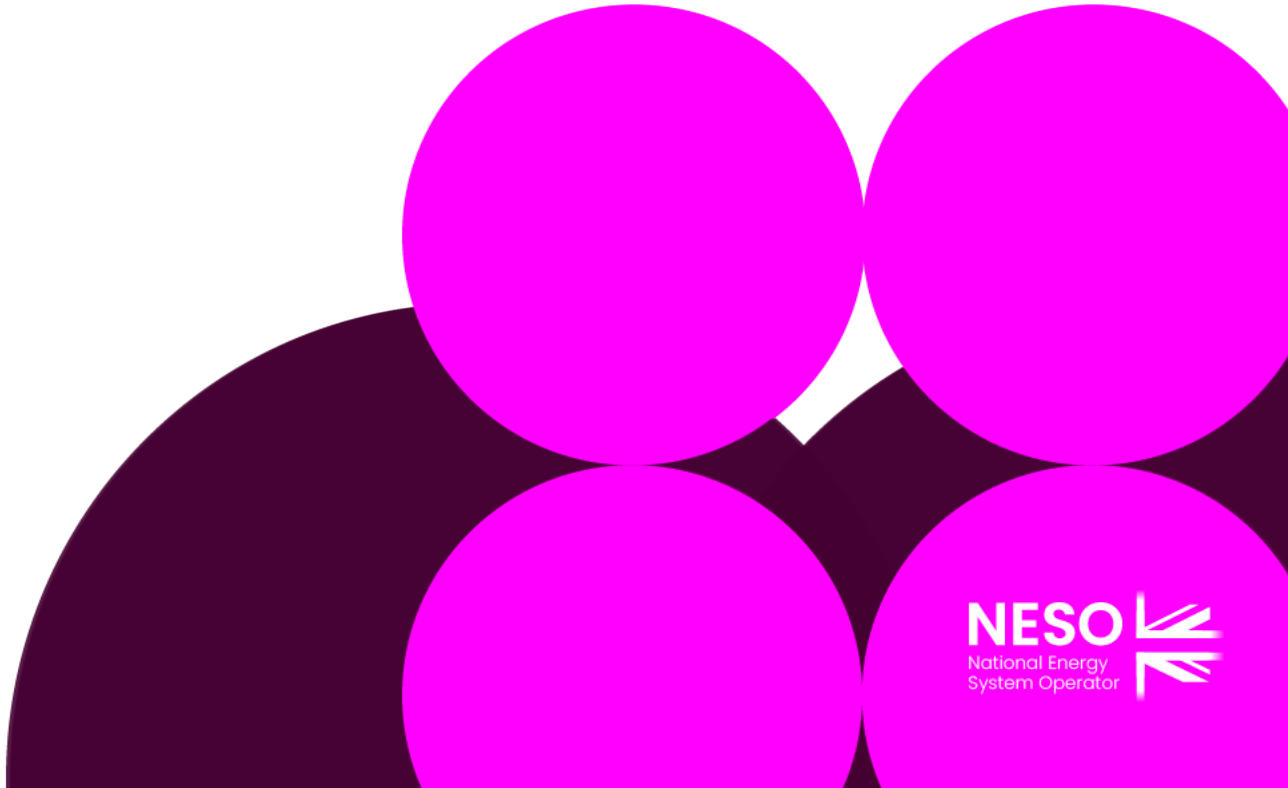


Terms of Reference

CMP414 Workgroup Term of Reference
a) Consider EBR implications
b) Provide clarity on potential and proposed benefits, in particular: • Financial benefits • Time saving benefits
c) Provide clarity on, and mitigation of, the risks in relation to Sub-Standard Assets and when Assets are shared
d) Provide clarity on Charging and the interaction with the existing charging regime.
e) Provide clarity on the impact on any Anticipatory Investment(s), including clarity on, and mitigation of any risks.
f) Provide clarity of true intent of proposal, given various instances of misalignment of STC and CUSC.
g) Provide clear analysis of TO- Contracted Users Incentives in terms of quality of build.

Any Other Business

Robert Hughes – Workgroup Chair



Next Steps

Robert Hughes – Workgroup Chair