

Workgroup Consultation Response Proforma**CMP298: Updating the Statement of Works process to facilitate aggregated assessment of relevant and collectively relevant embedded generation**

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@nationalgrideso.com by **5pm on 10 September 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation, please contact Paul Mullen paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Paul Munday
Company name:	Scottish and Southern Electricity Networks
Email address:	Paul.d.munday@sse.com
Phone number:	07876 837179

I wish my response to be:

(Please mark the relevant box)

☒ Non-Confidential☐ Confidential

Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel, the Workgroup or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

For reference the Applicable CUSC (non-charging) Objectives are:

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- 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;*
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- Promoting efficiency in the implementation and administration of the CUSC arrangements.*

**Objective (c) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).*

Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the CMP298 Original Proposal better facilitates the Applicable Objectives?	We believe that the Original Proposal does better facilitate objectives A, C and D. However, we are unsure that the proposal fully meets objective B.
2	Do you support the proposed implementation approach?	We support the proposed implementation approach.
3	Do you have any other comments?	No.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No.
Modification Specific Workgroup Consultation questions		
5	Do you believe it is appropriate for the ESO to approve/reject the changes to Appendix G proposed by the Distribution Network Operators or is it sufficient that such changes are deemed to be accepted with a disputes process by exception? Please provide the rationale for your response.	We believe it is sufficient for such changes to be deemed accepted with a dispute process by exception. Approval/rejection will not be required as all parties are expected to follow the documented process. If the TSO has a dispute with changes, the ESO is responsible for raising that issue.
6	Do you believe it is appropriate for the ESO to charge the Distribution Network Operators an application fee and/or a validation fee for their data to ensure the requirements of the Transmission Impact Assessment are met?	We agree that an application fee is appropriate, but we would disagree with the ESO charging a validation fee. Validation costs are variable and provision for them should be captured within application charging structures.

7	<p>The CMP298 Workgroup have proposed that the ESO should publish a central list of which GSPs are on Statement of Works/ Confirmation of Project Progression and which are on Transmission Impact Assessment. They have also suggested what should be included and set a minimum timescale. Do you agree that this data should be centralised and hosted by the ESO and if so, do you have any comments on the proposed content and timing? Please provide the rationale for your response.</p>	<p>We agree that the information should be held centrally by the ESO and we would support reasonable timescales for the roll out of this information within the two-year implementation period. The process for compiling information must remain efficient to avoid replication of the existing data exchanges between DSOs and the ESO.</p>
8	<p>Will the CMP298 Original Proposal impact on your business. If so, how?</p>	<p>Yes. As a DNO, we will be expected to implement the new process and educate our customer base. We will require close communication with the ESO to effectively manage the process. We may also require further internal resource as a result.</p>