

Code Administrator Consultation Response Proforma**CMP328: Connections Triggering Distribution Impact Assessment**

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 18 October 2021**. 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 Paul Mullen paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Deborah MacPherson
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Phone number:	07734 281373

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 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 in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions		
1	Do you believe that the CMP328 Original Proposal or WACM1 or WACM2 better facilitates the Applicable Objectives?	We believe the Original Proposal better facilitates Applicable Objectives, A and B and is neutral on C and D.
2	Do you support the proposed implementation approach?	<p>We consider proposed implementation approach to be reasonable.</p> <p>We note the proposer has taken on board feedback and amended the Original Proposal such that DNOs have flexibility as to whether or not a DNO is needed to avoid unnecessary administration and cost to both Transmission Users and Network Companies.</p>
3	Do you have any other comments?	<p>As noted above, we are supportive of the Original Proposal and on the basis that this is implemented, with the provision for DNOs to have permitted flexibility as to whether a DIA is required or not, we would ask that DNOs look to develop guidance for stakeholders to provide information and visibility as to which areas of their network will likely trigger a DIA.</p> <p>We note the working group has acknowledged that Transmission Users would be charged 100% of any DNO reinforcement works if triggered under a DIA with no consideration to CAF being applied. Whilst we accept consideration of this charging implication is out of scope of CMP328 and being considered as part of DCP392, it is key that the charging arrangements align with implementation to ensure that Transmission Connected Users are not detrimentally impacted as a consequence.</p> <p>We do not support WACM1 as we do not believe it to be an inefficient process and has the real potential to introduce further complications and risk for transmission connections.</p> <p>With respect to WACM2, we are supportive of an approach that would establish an applicability criteria. As noted above however, this should be on the basis that network companies make clear to stakeholders</p>

		what the criteria is for their respective network areas to allow potential connectees to assess the implications for their projects at the earliest opportunity.
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