

Workgroup 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 12 March 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 Rob Pears Rob.Pears@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Paul Mott
Company name:	EDF Energy
Email address:	Paul.mott@edfenergy.com
Phone number:	07752987992

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 CMP328 Original Proposal better facilitates the Applicable Objectives?	Yes, the current use of Third Party Works process is not efficient and not timely when applied to connections which require distribution impact assessment
2	Do you support the proposed implementation approach?	No, the proposer suggests that the ESO implement the modification 12 months from Ofgem's decision to approve the mod. We do not believe that 12 months notice is needed; 2 months should be ample.
3	Do you have any other comments?	We consider that the DCUSA modification being raised to ensure that the common connection charging method approach is applied, to ensure that there is a level playing field with costs charged to DG connecting to the DNO in the same place, is important alongside this CUSC mod to ensure fair and level competition. The full value of CMP328 can only be realised with appropriate DCUSA changes relating to fair apportionment of charging and standardisation of costs and process. The Distribution Impact Assessment should be a replacement of the Third Party Works process in the context of a tertiary connection
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
Modification Specific Workgroup Consultation questions		
5	For DNO respondents, please describe your process and timescales associated with current Third Party Works applications	-
6	For Third Party Works users, please describe your experience of using the Third Party Works process, specifically awareness of and timescales associated with the process; are there any defects	The timescales and approach are very variable, not so much by project as by DNO. In one case the request for an assessment of third party works was made to the DNO, UKPN, in April 2020, and it is still not available to the project almost a year later. This is wholly unacceptable.

	in the TPW process that the DIA process does not address?	
7	Annex 6 provides a summary of the WG's view of the pros/cons of both the Third Party Works and proposed Distribution Impact Assessment process.	
7a	Do you agree with this?	Yes.
7b	Do you have any additional pros or cons you wish to add?	No
8	Applicability - Do you agree with the applicability criteria proposed? Please provide your rationale.	No; we consider that it is also important that the processes in this modification should also be applied to tertiary connections where the site holds TEC but no third party works have yet been quoted by the DNO (and where no confirmation yet been issued by the DNO that there are no required third party works). We also believe that CMP328 should apply to tertiary connections only, not to all Transmission connections, as the latter will not impact DNOs.
9	Contractual milestones - Do you foresee a better way of updating contractual milestones to reflect the result of a Distribution Impact Assessment?	We believe that there should be a tripartite discussion between applicant, ESO and DNO before the content of Appendix J is updated to reflect the third party works assessment once that is available. This would also be the appropriate opportunity to discuss build vs non-build solutions in the event TPW were deemed necessary.
10	Fees and Costs - Do you agree with the Proposal that any costs as a result of the DIA should be passed from the DNO to the Transmission applicant via the ESO?	Yes. There would need to be due consideration to the management of clock start of the DIA – the reason to consider this is that currently the DNO TPW data request exceed the transmission application, and certain data requests include things such as P28 studies which would be undertaken much later in any development process. A lack of submission of certain data should not hold up the DIA.
11	Clean Energy Package (CEP) - Currently CUSC Section 4 documents the payments that will be made by the ESO for	Any compensation for curtailment at the DNO's behest, must be allowed for and reflected in the contractual agreement between the ESO and CUSC party, which

	Mandatory Services with the site-specific details captured in the Bilateral Connection Agreement. In your view, how/where should any compensational arrangements be documented for DNOs curtailing Transmission connected generators.	must require the ESO to pass all of this compensation on to the transmission connected customer. Under the TPW process, these requirements (including confirming the compensation rights) could be bilaterally managed between the Transmission connection and the DNO via a commercial contract that is created between them for the work.
12	Which of the following do you believe should be included when assessing options/impacts under the proposed DIA process;	
12a	impact upon distribution connected generators/storage with transmission export capacity (TEC)	Yes
12b	impact upon distribution connected generators/storage without transmission export capacity (TEC)	No
13	Should the DIA process be triggered upon receipt, or acceptance of an application from the transmission customer and please provide your reasoning.	The DIA process should be triggered upon receipt, to ensure that it proceeds in a timely fashion.