

Code Administrator 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 **21 February 2022**. 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:	Matthew Paige-Stimson
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Phone number:	Click or tap here to enter text.

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 CMP298 Original Proposal, WACM1, WACM2 and/or WACM3 better facilitates the Applicable Objectives?	<p>We believe WACM1 overall better facilitates the applicable objectives.</p> <p>WACM1 better meets applicable objectives A and D than the Original, by taking a more efficient approach for the proposed DNO monthly TIA data submissions. WACM1 still leaves the ESO with the right to actively declare errors in data by exception as required.</p> <p>We do not believe WACM2 or WACM3 better meet applicable objectives A or B as both are based on NGESO not applying charges for actual costs of rework when errors in the TIA application are identified. NGET expect to be able to recover additional costs of rework and this would appear to have the potential to be prevented under WACM2 or WACM3 if the ESO cannot recharge TO costs of rework to the User. The WACM2/3 approach undermines cost reflectivity and degrades the attention to first time quality of information submitted as part of TIA process.</p> <p>We believe the Original and all alternatives are positive in respect of objective B and are neutral to applicable objective C.</p>
2	Do you support the proposed implementation approach?	<p>No. We have concerns as the required STC modification process to enable implementation of CMP298 has only just been initiated.</p> <p>We expect STC modification CM080 will fully assess the transition work, mainly modelling work conducted by TOs, and set out the proposed pace of transition (e.g. volumes of GSPs with Planning Limits and Materiality Triggers set and BCAs revised).</p> <p>We would expect such an impact assessment to form a crucial part of the STC CM080 modification that needs to accompany this CMP298 modification to Ofgem.</p>

Standard Code Administrator Consultation questions

3	Do you have any other comments?	<p>1. Network Congestion and increased Interactivity</p> <p>We note that interactivity is increasing with concurrent applications from embedded distribution and transmission connected generation. Whilst the CMP298 proposal itself does not cause this interactivity, the proposed process sharply defines how such interactivity is managed and this will increase workloads, notably so with the increased application volumes we are observing.</p> <p>High levels of network congestion, i.e. finite network capacity compared to the volume of competing applications for connection from across transmission and distribution is inefficient and causes high levels of interactivity.</p> <p>Additional work is required by the industry to manage application volumes and factors underling increased interactivity, and to implement effective arrangements for managing transmission and distribution connection queues.</p> <p>2. Access and Forward-Looking Charges Significant Code Review (“Access SCR”)</p> <p>The Access SCR proposed introducing TNUoS for distributed generation down to 1MW. We note that Ofgem have proposed in their recent Access SCR minded-to position¹ that embedded TNUoS charges for Small Distributed Generation (SDG) will no longer be taken forward under the Access SCR and will be considered as part of wider transmission charging reform at a later time.</p> <p>The proposed management of connections under CMP298 will likely require further revision if formal transmission access rights for individual embedded SDG is implemented, given that individual transmission access queue positioning is required.</p>
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¹ <https://www.ofgem.gov.uk/publications/access-and-forward-looking-charges-significant-code-review-updates-our-minded-positions>