

## Draft STCP Modification Proposal Form

# PM0120: Connections Triggering Distribution Impact Assessment

**Overview:** The proposal seeks to make changes to System Operator Transmission Owner Code Procedures to reflect CUSC modification CMP328 relating to Transmission connections that trigger an impact assessment on the Distribution network.

## Modification process & timetable

1

### Initial STCP Proposal

10 May 2022

2

### Approved STCP Proposal

25 May 2022

3

### Implementation

10 working days following Authority decision on CMP328 and CM078

**Status summary:** The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.

## This modification is expected to have a: Medium impact

ESO and Transmission Owners

### Governance route

The Panel will make the decision on whether the modification should be implemented.

### Who can I talk to about the change?

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## What is the issue?

Currently within the CUSC there is no mechanism or specific process covering arrangements for Transmission connections that could have an impact on the Distribution system. Impacts are primarily direct physical impacts including but not limited to Fault Level rating, Thermal rating, Voltage control, Power Quality, Control and Protection systems. Impacts are also commercial where explicit transmission access rights that the Distribution system owner or embedded Users may have is impacted, and where commercially sensitive data, is held only by the ESO and the relevant CUSC Users and only publicly available in part. Without this modification there is not an appropriate process in place as a means of a transmission User facilitating connections that trigger Distribution impact assessments that covers both physical impacts and explicit transmission access rights impacts.

CUSC modification CMP328 aims to address this issue with the introduction of a "Distribution Impact Assessment" (DIA) process, which will establish a transparent process with clear and defined timescales for all parties involved.

As a result of the CUSC modification, it has been identified that changes will be required to the STC Procedures to enable and facilitate the changes within CMP328.

The Final Modification report for CMP328 is now with the Authority awaiting a decision, but it has been confirmed by the Authority that the associated STC/STCP changes will also need to be presented in order for a final decision to be made and implemented.

## Why change?

As part of the proposed CMP328 CUSC modification, it has been identified that changes will be required to some STC Procedures 18-1 & 18-6, to enable and facilitate the changes within CMP328.

Changes are needed to reflect the information ESO require from TOs to support DNO impact assessments.

There will be impacts related to challenges associated with interactivity between TO and DNO solutions whereby revisions to connection design may occur.

The connections process will also require amendments relating to:

- Making offers conditional on DIA outcomes.
- The processes and timescales for updating TOCAs further to receipt of DIAs.
- The requirement for ESO to share DIA outcomes.
- Ability to revise TOCA (to reflect DIA outcomes) without requiring a new Modification Application or associated fee(s) in some circumstances.

The CUSC modification also contains alternative solutions (WACM1 & WACM2) which have been presented to the authority and will need to be reflected in the STC/STCP changes (if required).

**WACM1** - Enhancement of the current Third Party Works (TPW) process.

**WACM2** – An applicability criteria is used rather than the original proposal blanket 1MVA threshold as to establish if a DIA is required.

## What is the proposer's solution?

### Original Proposal and WACM2

Changes will be required to STCP18-1 and 18-6 to ensure the expectations between NGENSO and the TOs in relation to the DIA process are clearly defined.

- If DIA is to be completed by the relevant DNO(s), the timescales related to when the TOs need to supply the additional information to NGENSO to support the DIA.
- The additional information required from the TOs to facilitate the production of the DIA.
- The timescales relating to NGENSO passing the completed DIA to the TOs in order for the assessment to be completed.
- The timescales for the TOs to assess the DIA and confirm back to NGENSO in relation to any actions required to the TO Construction Agreement as a result of the assessment.
- The process for resolving conflicts between NGENSO and TOs as a result of differing solutions between the TO Construction Agreement and DIA, and the process for referring these conflicts to the Authority should a resolution not be reached.

### WACM1

Changes will be required to STCP18-6 to define the process when the Transmission Applicant receives notification from the Third Party that Third Party Works are required.

### Legal text

In development

## What is the impact of this change?

### Proposer's assessment against STC Objectives

Relevant Objective	Identified impact
(a) efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act	<b>Positive</b> Creates an efficient process for connections to the Transmission system that require a distribution impact assessment
(b) development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission	<b>Neutral</b>
(c) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity	<b>Positive</b> Creates opportunities for generation to connect at both Transmission and Distribution

(d) protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees	<b>Neutral</b>
(e) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC	<b>Positive</b> Creates an efficient process for connections to the Transmission system that require a distribution impact assessment
(f) facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;	<b>Positive</b> Provides a clear and documented process for generation to connect to the transmission system
(g) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.	<b>Neutral</b>

Proposer's assessment against the STCP change requirements <sup>1</sup>	Proposer's assessment
(a) the amendment or addition does not impair, frustrate or invalidate the provisions of the Code	Requirement met
(b) the amendment or addition does not impose new obligations or liabilities or restrictions of a material nature on Relevant Parties which are not subsidiary to the rights and obligations of the Relevant Parties under the Code	Requirement met
(c) the amendment or addition is not inconsistent or in conflict with the Code, Transmission Licence Conditions or other relevant statutory requirements	Requirement met
(d) the Relevant Party Representatives deem that the amendment or addition is appropriate to support compliance with the Code	Requirement met

## When will this change take place?

### Implementation date

Implementation timelines in line with CUSC modification CMP328 and STC modification CM078.

<sup>1</sup> STCP changes may only be made if they meet the requirements in Section B, 7.3.2

<b>CMP328 solutions</b>	<b>STC changes required</b>	<b>STCP changes required</b>
Original Proposal and WACM2	STC Schedules 5 & 6 via CM078	STCP18-1 and STCP18-6 via PM0120
WACM1	No STC change required	STCP18-6 via PM0120

It is recommended by the Code Administrator that the STC Panel give advance approval to implement the corresponding STCP changes to facilitate the CMP328 solution decided by the Authority. The expectation is that the Authority will issue decisions for CMP328 and CM078 on the same day. This will enable an efficient implementation of all three modifications 10 working days following the Authority decision.

## Interactions

- Grid Code       BSC       CUSC       SQSS  
 European Network Codes       Other modifications       Other

This modification is required as a follow-on from CUSC modification CMP328.

## Panel Determination

<b>Party</b>	<b>Determination</b>
<b>National Grid (ESO)</b>	To be updated following Panel determination
<b>National Grid (TO)</b>	To be updated following Panel determination
<b>Offshore Transmission Owners (OFTOs)</b>	To be updated following Panel determination
<b>Scottish Hydro Electric Transmission plc (SHET)</b>	To be updated following Panel determination
<b>SP Transmission Limited (SPT)</b>	To be updated following Panel determination

## Acronyms, key terms and reference material

<b>Acronym / key term</b>	<b>Meaning</b>
BSC	Balancing and Settlement Code
PM	Procedure Modification
CUSC	Connection and Use of System Code
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
DIA	Distribution Impact Assessment
DNO	Distribution Network Operator
ESO	Electricity System Operator
TO	Transmission Owner
TOCA	Transmission Owner Connection Agreement
NGESO	National Grid Electricity System Operator
TPW	Third Party Works

**Reference material**

[CMP328 - Connections Triggering Distribution Impact Assessment](#)