

Code Administrator Consultation Response Proforma**CM080: Transmission Impact Assessment Process**

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 stcteam@nationalgrideso.com by **5pm on 20 May 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 Sally Musaka, sally.musaka@nationalgrideso.com or stcteam@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Matthew Paige-Stimson
Company name:	National Grid Electricity Transmission plc
Email address:	matthew.paige-stimson@nationalgrid.com
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 STC Objectives are:

- a) *efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act*
- b) *development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission*
- 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*
- 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*
- e) *promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.*
- f) *facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
- g) *compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.*

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 Original Proposal and WACM1/WAGCM1 better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Original</td> <td style="width: 10%;"><input type="checkbox"/>A</td> <td style="width: 10%;"><input type="checkbox"/>B</td> <td style="width: 10%;"><input type="checkbox"/>C</td> <td style="width: 10%;"><input type="checkbox"/>D</td> <td style="width: 10%;"><input type="checkbox"/>E</td> <td style="width: 10%;"><input type="checkbox"/>F</td> <td style="width: 10%;"><input type="checkbox"/>G</td> </tr> </table> <p>We believe the Original Proposal has the potential to be positive in respect of Objectives A, C, E and F but this is contingent upon the detailed process expected to be set out in STCP18-4. However, at this time we cannot say the proposal better meets these relevant objectives as STCP18-4 has not been developed.</p> <p>We consider the proposal neutral to objectives B, D and G.</p> <p>The proposal is not as administratively efficient as it could be, and we are concerned over the resource impact on TOs which is critically contingent on the processes that have yet to be agreed / developed.</p> <p>We need to be assured of sensible prescribed Evaluation of Transmission Impact (ETI) timescales, expected to be defined in STCP18-4, but which are not set out in this CM080 proposal.</p> <p>We have provided more detailed comments in question 3.</p>	Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input type="checkbox"/> G
Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input type="checkbox"/> G			

Standard Code Administrator Consultation questions		
2	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Without the changes to STCP18-4 being concluded we do not believe it is appropriate to set out the timings of implementation.</p> <p>As we have not yet commenced discussion of STCP18-4 process drafting we are unable to agree an implementation approach.</p> <p>A very first draft of changes to STCP18-4, based on a very simple copying of the Statement of Works process, has only just been issued in the last few days and meetings are yet to commence.</p> <p>The ETI process intended to be carried out is more onerous than for the Statement of Works process and is therefore far from being a direct equivalent.</p> <p>More time will be required of power system engineers and from the ESO in providing background network models and planning assumptions to make the process function.</p> <p>Once the detailed process development within STCP18-4 is well underway we will be in a better position to gauge likely resourcing impacts and recruitment needs. We will then be able to have an informed discussion over implementation.</p>
3	Do you have any other comments?	<p>We understand that the timescales and detailed delivery process will be covered under changes to STCP18-4.</p> <p>We consider this modification has been published too soon and STCP18-4 modifications should have been set out in detail concurrently and have reached a point where affected STC parties were comfortable with STCP proposals.</p> <p>CM080 (only changes to STC Section D being consulted upon here) has no content to indicate the likely impact of the proposal on TOs.</p> <p>In this instance we believe it would be appropriate to wait until the detailed application in STCP18-4 is agreed in principle by affected STC parties before this modification is submitted.</p> <p><u>CM080 changes to Trigger Criteria Data</u></p> <p>We suggest items stated in Legal Text in 4.3.2 (MVA) and 4.3.3 (MVA_r) can be removed. These are broadly superfluous and confer little that is not delivered from the MW criterion.</p> <p>MWs covered in 4.3.1 and kA covered in 4.3.4 should be sufficient. It is for note that the proposed submission of DNO data, used to inform the Materiality Trigger for subsequent review, is expected to only by in MWs.</p>

Standard Code Administrator Consultation questions

--	--	--