

Code Administrator Consultation Response Proforma**CMP376: Inclusion of Queue Management process within the CUSC**

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 4 May 2023**. 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:	Sarah Graham
Company name:	Ocean Winds
Email address:	Sarah.Graham@oceanwinds.com
Phone number:	07464675593

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.*

**The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.*

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 CMP376 Original proposal and/or WACMs 1-11 inclusive better facilitate the Applicable Objectives?	Mark the Objectives which you believe each solution better facilitates:				
		Original	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM1	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM2	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM3	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM4	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM5	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM6	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM7	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM8	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM9	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM10	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		WACM11	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D
		<p>Ocean Winds is concerned that the Original and WACMs 1, 2, 3, 4, 5, 6, 7 and 10 do not better facilitate (b) than the existing CUSC because they put parties that need to apply for a connection several years in advance of planned Completion Date (e.g. offshore wind farms) at a competitive disadvantage due to increased risk of termination. Offshore wind projects need to secure their connection agreement 7+ years (and in some cases 10+) before their first power is planned, in order to secure an onshore connection point and start planning consent activities along the export cable route; some delays could occur during the development of such projects, and it cannot be expected that their development timeline is fixed so many years before electricity starts being produced. This puts offshore wind projects at greater risk of termination, and at a competitive disadvantage, to other technologies with shorter development and delivery timescales.</p> <p>WACMs 8, 9 and 11 better facilitate (b) than the existing CUSC, and better than the Original and WACMS 1, 2, 3, 4, 5, 6, 7 and 10, because they provide sufficient flexibility to allow consented projects that are progressing to manage the delivery of their projects without such a</p>				

		<p>significant risk of termination. WACMs 8, 9 and 11 allow the User to submit a Modification Application, if required, to move their Completion Date and associated milestones as their development and delivery programme develops.</p> <p>WACM 11 offers the best solution because it provides the correct balance of early termination milestones to ensure parties are progressing with their projects in a timely manner and the flexibility to allow projects that are consented but awaiting the necessary governmental or regulatory subsidy to achieve Project Commitment to either claim an Exception or to submit a Modification Application with a resulting move down the “connections queue”. This will help to ensure that investors are not deterred from developments in GB and avoid the unintended consequence of the Original (and WACMs 1, 2, 3, 4, 5, 6, 7 and 10) of increasing barriers to innovation and financing due to the uncertainty of possible termination.</p>
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
3	Do you have any other comments?	<p>Ocean Winds considers that the Original and WACMs 1, 2, 3, 4, 5, 6, 7 and 10 do not address the issue that the Code Administrator Consultation seeks to address:</p> <p>“There is currently no mechanism in the CUSC to enable network companies to actively manage connection queues to ensure that capacity allocation is optimised for the benefit of all Users and end consumers.”</p> <p>The section of the report titled “What is the impact if this change is made?” states that:</p> <p>“Users who fail to meet their milestones may be terminated to free up capacity to provide the opportunity for other Transmission connected projects, which will be, or can be, ready to connect on a given connection date, ahead of those projects that may have applied earlier, but are not ready to connect on their originally contracted Completion Date. This should help meet net zero targets and allow customers to connect to the NETS more quickly.”</p> <p>The Original and WACMs 1, 2, 3, 4, 5, 6, 7 and 10 do not provide any explanation as to how capacity would be</p>

		provided to other Users. These options simply remove Users from the queue, it is only WACMs 8, 9 and 11 that set out the means to provide capacity to other Users to allow them to progress more quickly.
--	--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------