

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:	David Tuffery
Company name:	National Grid Electricity Distribution
Email address:	dtuffery@nationalgrid.co.uk
Phone number:	01179 332025

I wish my response to be:

(Please mark the relevant box)	<input type="checkbox"/> Non-Confidential
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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	A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/>	
		WACM1	A <input type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/>	
		WACM2	A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/>	
		WACM3	A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/>	
		WACM4	A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/>	
		WACM5	A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/>	
		WACM6	A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/>	
		WACM7	A <input type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/>	
		WACM8	A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/>	
		WACM9	A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/>	
		WACM10	A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/>	
		WACM11	A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/>	
2	Do you support the proposed implementation approach?	Yes overall National Grid Electricity Distribution support the CMP376 original proposal with the WACMs that better facilitate the Applicable Objectives identified above.		
3	Do you have any other comments?	<p>WACM1/2 – We agree that this change from the Original proposal encourages a more standardised/consistent approach for all users and will enable more efficient QM of schemes more than 2 years out.</p> <p>WACM3/4 – We support the more stringent compliance than these WACMs offer over the Original M3. It better</p>		

aligns with Distribution requirements for land rights. The improved visibility and increased certainty will help ensure that investment on the transmission network is made efficiently.

WACM5/6 – We are concerned that this ‘bilaterally negotiated’ position could lead to inconsistent treatment without clearer requirements on how an agreement is reached. We appreciate that there are situations where having the ability to bilaterally negotiate makes sense, as can better account for scheme risk and scope of work. Without more clarity on how they will be negotiated we support the more open and standardised Original proposal.

WACM7 – Assuming this can be retrospectively applied to pre-CMP376, we support the application of QM to all schemes where the completion date is more than 2 years away. This removes the challenges that come from having schemes with/without CMP376 milestones. We cannot comment on the legal practicalities of retrospectively applying to existing schemes. Where NGED applied the ENA QM 2016 and 2021 guidance it was not retrospectively applied and this has come with challenges on managing schemes out the queue that have offers that predate milestones.

WACM8/9/11 – We agree with the concept of Dynamic QM, but reassignment of queue position needs more consideration. This includes the interaction with distribution customers and T-D whole system queue management. Moving slow schemes that are missing milestone down the queue will still be taking up capacity in the contracted/accepted position that is a driver for investment including distribution mod-offers. We think this needs further consideration and more detailed engagement with DNOs before it can be progressed. There is also a risk that this could delay the positive changes in the original CMP376 due to the

	<p>requirement to create a formal STC ESO to TO process to manage this. We suggest that this is picked up in a subsequent change proposal/consultation with DNO and other parties fully engaged to ensure a coordinated T-D approach.</p> <p>It is a positive that the same milestone names as per the ENA 2021 queue management guidance are utilised (where applicable).</p> <p>The promotion of a 'ready to connect' customer needs to be assessed in the context of the wider T-D queue to ensure distribution customers aren't disadvantaged.</p> <p>We believe that 'Issues outside of Users control' and valid evidence of Milestones needs to be well defined.</p>
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