

Workgroup Consultation Response Proforma**CM079: Consideration of STC/STCP changes in relation to CMP330/374**

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 08 AUGUST 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 Elana.Byrne@nationalgrideso.com or stcteam@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Duncan Pomeroy	
Company name:	Enso Energy Ltd	
Email address:	Duncan.pomeroy@ensoenergy.co.uk	
Phone number:	07887 822648	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input checked="" type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

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:

- efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act
- development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission
- facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity
- 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
- 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 Workgroup Consultation questions		
1	Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?	<div>Mark the Objectives which you believe the Original Solution better facilitates:</div> <div>Original <input type="checkbox"/>a <input checked="" type="checkbox"/>b <input checked="" type="checkbox"/>c <input type="checkbox"/>d <input type="checkbox"/>e <input checked="" type="checkbox"/>f <input type="checkbox"/>g</div> <div>Click or tap here to enter text.</div>
2	Do you support the proposed implementation approach?	<div><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</div> <div>Click or tap here to enter text.</div>
3	Do you have any other comments?	Click or tap here to enter text.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<div><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</div> <div>Click or tap here to enter text.</div>

Specific Workgroup Consultation questions		
5	Having reviewed the proposed CM079 solution and legal text, are there any significant matters arising which you feel may have a bearing on the associated CUSC modification proposal (CMP330/374/414)?	<div><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</div> <div>Click or tap here to enter text.</div>

The Respondent was approached post-consultation to offer context to the answers provided above, and was happy for the following comments to be shared:

Generally the more competition and contestability in connection works has to be good at driving down costs and lead times to connect. The TOs will not want to naturally give up work and control over these longer OHL connections and there is a preconceived idea that they can better deliver the works. There is also a preconceived idea the other way the TOs are always slower and more

expensive, and a frustration where works are non-contestable that connectees just have to accept whatever the TO says. Ultimately the party paying and taking the risk should be able to choose their delivery model.

So my support for this specific proposal is largely driven by wanting to open up more competition in connections. There is also the reality that the TOs are not geared up for delivery on the scale required in coming years and so allowing other parties to progress connection works should help unblock what is increasingly being seen as a blocker which is TOs (I speak primarily about NGET) not having the resources to deliver connection dates.