

STC Alternative and Workgroup Vote

CM087: Introducing Connections Process to facilitate Competitively Appointed Transmission Owners

Please note: To participate in any votes, Workgroup members need to have attended at least 50% of meetings.

Stage 1 - Alternative Vote

If Workgroup Alternative Requests have been made, vote on whether they should become Alternative STC Modifications.

Stage 2 - Workgroup Vote

2a) Assess the Original solution and Alternative STC Modifications (if there are any) against the STC objectives compared to the baseline (the current STC).

2b) If Alternative STC Modifications exist, vote on whether each Alternative STC Modification better facilitates the Applicable STC Objectives better than the Original Modification Proposal.

2c) Vote on which of the options is best.

Terms used in this document

Term	Meaning
Baseline	The current STC (if voting for the Baseline, you believe no modification should be made)
Original	The solution which was firstly proposed by the Proposer of the modification
Alternative STC Modification	An Alternative Solution which has been developed by the Workgroup

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.

Workgroup Vote

Stage 1 – Alternative Vote

Vote on Workgroup Alternative Requests to become Alternative STC Modifications.

The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.

Should the majority of the Workgroup OR the Chair believe that the potential alternative solution would better facilitate the STC objectives (against Baseline or the Proposer's modification) then the potential alternative will be fully developed by the Workgroup with legal text to form Alternative STC Modifications and submitted to the Panel and Authority alongside the Proposer's Modification for the Panel Recommendation vote and the Authority decision.

“Y” = Yes

“N” = No

“-“ = Neutral (Stage 2 only)

“Abstain”

Workgroup Member	Alternative 1 (Company, characteristic)	Alternative 2 (Company, characteristic)	Alternative 3 (Company, characteristic)	Alternative 4 (Company, characteristic)
Alternative STC Modifications?				

Stage 2a – Assessment against objectives

To assess the Original and Alternative STC Modifications against the STC objectives compared to the baseline (the current STC).

You will also be asked to provide a statement to be added to the Workgroup Report alongside your vote to assist the reader in understanding the rationale for your vote.

ASO = Applicable STC Objective

ASM = Alternative STC Modifications

Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Overall (Y/N)
	Gareth Stanley/Stephen Baker – National Grid ESO							
Original	Y	-	-	-	-	-	Y	Y
<p>Voting Statement:</p> <p>The changes in this modification of the STC effectively inform and instruct the TO CATO Connections Process to allow Competitively Appointed Transmission Owners to connect to the transmission network. It instructs CATO's and pre-existing TO's roles and responsibilities as STC parties, ensuring clarity for all necessary interactions. The modification plays an essential role in enabling Onshore Network Competition for the design, build and ownership of Onshore Transmission assets.</p>								

Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Overall (Y/N)
	Greg Stevenson – Scottish Hydro Electric Transmission Ltd							
Original	Y	N	N	N	N	N	Y	N
<p>Voting Statement:</p> <p>We understand the need for this modification and have marked Objectives A & G as positive as CM087 is required to align with the introduction of Early Competition and CATOs through the Energy Act 2023 and any subsequent legislation.</p> <p>Overall we do not support the modification and have concerns with proposed changes to the STC and subsequent STCPs. Our main areas of concern are that PTOs are already carrying out long term planning in terms of our systems, investment and understanding of how our network will perform. This will not allow us to carry out an effective long-term holistic design of our network which is critical to ensure we can meet 2030 and beyond Net-Zero goals.</p> <p>The proposal further complicates the current interface arrangements for the PTO with an ever-increasing number of connections to the core PTO networks which are critical to daily operations and electricity system recovery strategies.</p>								

We note that the proposed changes will increase the inefficiency and flexibility in discharging our own transmission licensee obligations by over-specifying the technical and operational interactions for interfaces between CATOs and PTOs.

Further work is on-going to refine the legal text and more importantly STCPs 18-5 and 19-7 which is welcomed but we are not fully comfortable with these in their current state. Further refinement is required across the Workgroup.

As this modification is introducing a new Transmission connection process alignment with the STCPs is essential and in our view needs to be understood to vote on the STC modification.

We have concerns that the processes in their current form will not provide a level playing field for PTOs and CATOs. Substantial additional resource will be required in the PTO to meet the proposed obligations which is not a straightforward solution in an already depleted workforce marketplace. We will need specialist power engineers who must be allowed the time to fully comprehend the wide ranging and broad network design complexities required to deliver safe, secure and timely solutions.

Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Overall (Y/N)
	Mark Fitch – TINV							
Original	Y	-	-	Y	-	-	-	Y
Voting Statement:								

Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Overall (Y/N)
	Simon Orr – National Grid Electricity Transmission							
Original	-	-	-	-	N	-	Y	Y
Voting Statement:								

Of the 4 votes, how many voters said this option was better than the Baseline.

Option	Number of voters that voted this option as better than the Baseline
Original	3

Stage 2c – Workgroup Vote

Which option is the best? (Baseline, Original Proposal, Alternative STC Modification 1 or Alternative STC Modification 2)

Workgroup Member	Company	BEST Option?	Which objective(s) does the change better facilitate? (if baseline not applicable)
Gareth Stanley	National Grid ESO	Original	a) and g)
Greg Stevenson	Scottish Hydro Electric Transmission Ltd	Baseline	
Mark Fitch	TINV	Original	a) and d)
Simon Orr	National Grid Electricity Transmission	Original	g)