

Code Administrator Consultation Response Proforma

CMP427: Update to the Transmission Connection Application Process for Onshore Applicants

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 16 February 2024**. 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 catia.gomes@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Claire Hynes & Tim Ellingham	
Company name:	RWE Renewables (Swindon) Ltd & RWE Supply & Trading	
Email address:	Claire.hynes@rwe.com	
Phone number:	07787273960	
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 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** (*this will be shared with industry and the Panel for further consideration*)

☐ **Confidential** (*this will be disclosed to the Authority in full but, unless specified, will not be shared with the Panel or the industry for further consideration*)

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	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	Mark the Objectives which you believe the proposed solution(s) better facilitates:
		Original <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		WACM1 <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		WACM2 <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		WACM3 <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
<p>A - Positive –This modification will help to prevent speculative projects reserving a position in the connection queue without the intention of developing the site as demonstrated by the discussions with the Landlord.</p> <p>B – Positive - This modification will ensure that the applicant is in discussions with the landlord to develop an appropriately sized site for their technology which provides more fair and transparent grounds for the grid connection request and thus better facilitates competition between generators. WACM 1 and 3 better facilitates competition than the original by ensuring that parties who are utilizing compulsory purchase orders are not placed in an unfavourable position by having to obtain an LoA from the landlord but can instead provide evidence signed by a party designated by the Authority under Template B. WACM 2 better facilitates competition by providing an LoA for 50% of the site which provides adequate evidence of progression without inhibiting a project in it's early stage of development.</p> <p>C - Neutral</p> <p>D - Positive - This modification should help to reduce the extra administration caused by National Grid Electricity System Operator (NGESO) having to process speculative connection applications resulting in greater efficiency in the administration of the CUSC arrangements. WACM 2 and 3 further meets this objective by balancing the practicalities of developing an early stage project and</p>		

		engaging with multiple land owners with providing sufficient evidence of a site for the development of the project. This approach will reduce the administrative burden on NGESO whilst providing sufficient evidence of progression.
2	Do you have a preferred proposed solution?	<input type="checkbox"/> Original <input type="checkbox"/> WACM1 <input type="checkbox"/> WACM2 <input checked="" type="checkbox"/> WACM3 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		WACM 3 best facilitates effective competition by addressing the real world implications of requiring a Letter of Authority (LoA) at grid application. Firstly, through a second template letter signed by a designated authority that provides for instances such an order for the compulsory purchase of land where a letter from the landlord would not be preferred. Secondly, by providing an LoA for 50% of the site to ensure that sufficient evidence of progression is provided but does not act as a barrier to viable projects in their early stage of development and requires a more sustainable level of administration from the ESO.
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Click or tap here to enter text.
4	Do you have any other comments?	No.