

Workgroup 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 26 January 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 catia.gomes@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details	
Respondent name:	Muhammad Madni	
Company name:	National Grid Ventures	
Email address:	Muhammad.madni@nationalgrid.com	
Phone number:	07500194367	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input checked="" 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☐ 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 Workgroup Consultation questions				
1	Do you believe that the Original Proposal better facilitate the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input checked="" type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> </table> <p>Although the proposal is not applicable to NGV we understand the premise behind the approach and understand that this will be a step closer to mitigate against speculative applications.</p>	Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D
Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D			
2	Do you support the proposed implementation approach?	<p><input type="checkbox"/>Yes (Not Applicable) <input type="checkbox"/>No</p> <p>Please see comments in section 1 above. In addition, we have the following comments:</p> <ul style="list-style-type: none"> a. We understand that the LoA requirement has been initiated under the Connection Action Plan of DESNZ + Ofgem and excludes Interconnectors. b. After reviewing the consultation and working group inputs, we observed that there are discrepancies/ areas requiring further review in the LoA mechanism; these include, inter-alia, the validity period, good faith discussions, land density table and multiple applications for same land. c. Although this modification is not applicable to IC's we as an industry stakeholder, believe that as an initial step the implementation approach is rightly directed to address the issue; however, careful consideration must be given to creating a standardized LoA and implementation approach while addressing the identified discrepancies/ issues, which will be crucial in augmenting the scope of the LoA to achieve the desired outcomes and enable the smooth operability of the connection process for the industry in general 		
3	Do you have any other comments?	<p>The rationale behind the potential subsequent modification, which ESO expects to require LoA for ICs and Offshore applications, as referenced in footnote 2 page 5 and page 16 , is unclear; particularly since the 'Connect & Manage' policy is not applicable to such connections. Consequently, such applications would not be regarded as speculative, especially in light of the existing 'Invest & Connect' commitment provisions.</p>		

4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Since this is not directly engaging / impacting the IC's we would not propose any alternative request.
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Specific Workgroup Consultation questions

5	Do you believe that the proposed LoA meets the objectives set out by Ofgem and DESNZ in CAP? If not, please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Supra note section 1 & 2: As an initial step it does meets the Key action plan 1, "Raise entry requirements" set in the CAP 3.1; however, the CAP further requires ESO to closely monitor the impact of LOA measures and code modification made. This entails regular evaluation of its efficacy and contemplating the necessity of additional actions, including a subsequent code modification, where deemed suitable to, strengthen the LoA requirement.
6	Do you believe that an LoA should have a validity period? If so, please provide a timescale and your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No Supra note section 1 & 2: This would require further evaluation and with I/Cs / offshore connections being out of scope of this modification we will not be commenting.
7	Do you agree, in principle, with the concept of an Energy Land Density table? If not, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No Supra note section 1 & 2: This would require further evaluation and with I/Cs / offshore connections being out of scope of this modification we will not be commenting.
8	Do you agree with format and the categories proposed in the Energy Land Density table? If not, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No Supra note section 1 & 2: This would require further evaluation and with I/Cs / Offshore connections being out of scope of this modification we will not be commenting.
9	Do you have different values that you can provide for the Energy Land Density table? If so, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No Supra note section 1 & 2: This would require further evaluation and with I/Cs / offshore connections being out of scope of this modification we will not be commenting.

10	Do you believe that the LoA should be in the form of a standard template? If not, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Supra note section 1 & 2: This would require further evaluation and with I/Cs / Offshore connections being out of scope of this modification we will not be commenting.
11	Do you believe the use of the word “authorise” within the LoA, could have adverse legal consequences? If so, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Supra note section 1 & 2: This would require further evaluation and with I/C Offshore connections being out of scope of this modification we will not be commenting.
12	Do believe the proposed LoA template is suitable for all jurisdictions (England & Wales, and Scotland)? If not, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Supra note section 1 & 2: This would require further evaluation and with I/Cs / Offshore connections being out of scope of this modification we will not be commenting.
13	Do you believe that the technology type should be included in the LoA template? If you not, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Supra note section 1 & 2: This would require further evaluation and with I/Cs / Offshore connections being out of scope of this modification we will not be commenting.
14	Do you consider the exemption approach to deal with exceptional circumstances appropriate? If not please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Supra note section 1 & 2: This would require further evaluation and with I/Cs / Offshore connections being out of scope of this modification we will not be commenting.