

## 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](mailto:cusc.team@nationalgrideso.com) by **12 noon on 04 March 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](mailto:catia.gomes@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Michelle MacDonald Sandison	
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<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network Operator <input 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 type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		WACM3 <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		<p>SSEN Distribution are fully supportive of the intention of introducing Letters of Authority. However, we have identified some concerns with the current drafting which we have detailed below.</p> <p><u>Original and WACM1</u></p> <p>We believe that the Original and WACM1 are an improvement on the baseline as they will raise the entry requirements into transmission connections. This supports the transmission owners/ESO in making strategic investment decisions, as the applications made will be less speculative.</p> <p>This also better aligns Transmission Connections with the entry requirements for Distribution Connections. SSEN Distribution is fully supportive of the use of Template A. <u>However</u>, we are concerned that the inclusion of Template B will place a greater onus and responsibility on DNOs than is currently required under the Distribution frameworks. Under the current DNO process, parties who are the landowner AND the connecting party are not required to provide a letter of authority. For clarity, a letter of authority should only be required to authorise a third party to act on a landowner's behalf.</p> <p>The ESO also confirmed in the Second CAC that BEGA/BELLA applications are out of scope of CMP427 and are, instead, governed by the letter of authority obligations with the respective DNO. However, the legal text does not reflect this as the definition of 'new connection site' in the CUSC</p>

		<p>specifically references bilateral agreements, of which the definition includes BEGAs and BELLAs.</p> <p>While we appreciate that a Guidance document is intended to be launched prior to implementation, we require clarification on what situations letters of authority would be applicable to for DNOs/IDNOs at the earliest possible date. Such clarification is essential for us to assess the burden placed upon DNOs. Specifically, Template B, which is not aligned with the current distribution process. We note that these interactions have also not been taken into consideration in this consultation.</p> <p><u>WACM 2 and WACM 3</u></p> <p>SSEN Distribution believe that whilst WACM2 and WACM3 are better than the baseline, they do not go far enough in raising the entry requirements for transmission connections, and do not meet the objectives in the Connection Action Plan (CAP). We acknowledge some projects may face the challenges in achieving the 100% acreages outlined in the original and WACM1. However, we believe that enforcing this requirement enhances the entry criteria in alignment with the CAP.</p>
2	Do you have a preferred proposed solution?	<input checked="" type="checkbox"/> Original <input checked="" type="checkbox"/> WACM1 <input type="checkbox"/> WACM2 <input type="checkbox"/> WACM3 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		As per Q1 above.
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		We agree with the Implementation Approach.
4	Do you have any other comments?	<p>SSEN Distribution is highly concerned at the late notice that CMP427 will also impact DNO's.</p> <p>In the first Code Administrator Consultation (CAC) (dated 12<sup>th</sup>-16<sup>th</sup> Feb 2024), this modification "expected to have a: High impact for Generators, Demand Users, ESO".</p> <p>However, when the Second CAC opened on Wednesday 28<sup>th</sup> of Feb 2024, this had changed to "expected to have a: High impact on Directly Connected Generators, Directly Connected Demand Users, ESO, DNOs and IDNOs".</p> <p>This has only given DNO's 2.5 working days to assess what this change means for them and their customers.</p>

		This was also not directly highlighted to DNO's when the second CAC was published.
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