

Workgroup Consultation Response Proforma

CMP428: User Commitment liabilities for Onshore Transmission circuits in the Holistic Network Design

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 **21 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 cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Nitin Prajapati	
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Phone number:	0779 0970 158	
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 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 checked="" 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 Workgroup, 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*

- d) *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 facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe the Original solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> </table> <p>We believe the original proposal better facilitates applicable objective (b) as it enables circuits classified as onshore transmission (reinforcement) in the HND to not be classified as Attributable Works and therefore not impose significant liabilities on generators. This in turn will incentivise development of offshore generation which aids competition.</p> <p>The original proposal helps facilitate applicable objective (d) as it will provide clarity to the industry on what assets are not classified as Attributable Works for generators in the Holistic Network Design (HND) and future iterations of the HND.</p>	Original	<input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
Original	<input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D			
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>The implementation approach will enable better cost reflectivity from a User Commitment perspective. It also ensures the purpose of Onshore Transmission (Reinforcement) is reflected in the methodology aligned to the asset classification decision from the Authority.</p>		
3	Do you have any other comments?	No further comments.		
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/>Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/>No</p> <p>No, we are satisfied with the CMP428 Original Proposal.</p>		

Specific Workgroup Consultation questions		
5	Does the solution help provide better cost reflectivity for liabilities?	Yes, the solution will enable the purpose of onshore transmission (reinforcement) circuits within the HND to be captured within the methodology. As summarised in the asset classification decision from the Authority, the purpose of onshore transmission (reinforcement) circuits in the HND are to reinforce the onshore network and therefore deliver wider system benefit. It would not be cost reflective for developers to secure works associated with onshore transmission (reinforcement) circuits as they serve a broader purpose for wider users. Removing onshore transmission (reinforcement) circuits within the HND from Attributable Works will ensure the User Commitment liabilities are more cost reflective and help incentivise investment going forward.
6	Do you agree the title of this modification should be changed to 'User Commitment liabilities for Onshore Transmission (reinforcement) in the Holistic Network Design'?	Yes, the new title captures the correct terminology when referring to onshore transmission as reinforcement in the context of this modification.