

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:	Aaron Priest	
Company name:	Arven Offshore Wind Farm Limited	
Email address:	aaron.priest@oceanwinds.com	
Phone number:	07881380852	
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 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> <p>Original <input type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</p> <p>Tackling a known barrier to entry facilitates competition and facilitates access. High early securitisation requirements for offshore wind projects are seen as a significant barrier to the progression of otherwise viable projects due to the necessary scale of future ASTI/TCSNP/CSNP Works, which will include coordinated network designs. Without the type of changes proposed in this modification some viable offshore wind projects may simply not go ahead. Incentivising the development of offshore wind projects will facilitate effective competition in generation. Providing clarity on what assets constitute Attributable Works for offshore wind projects will promote efficiency in the administration of the CUSC.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>
3	Do you have any other comments?	<p>The proposed definition of “Excepted Works” is based on the asset classification published by the Authority on 19 October 2022. The Authority shall need to ensure that future asset classifications, for example the one due to be published following the publication of the HNDFUE/tCSNP, use the same asset classification “onshore transmission (reinforcement)” in order for the asset classification to operate as intended within the provisions introduced to the CUSC.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for	<p><input type="checkbox"/>Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>

	the Workgroup to consider?	
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Specific Workgroup Consultation questions		
5	Does the solution help provide better cost reflectivity for liabilities?	Yes, the solution ensures that onshore transmission reinforcement that has wider system benefit is not securitised by only one User or a small group of Users.
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 proposed solution and legal text is focused on the asset classification of "onshore transmission (reinforcement)", rather than generally onshore transmission circuits. There are other onshore transmission circuits identified in the Network Options Assessment 2021/22 Refresh that accompanies the HND that do not fall within the scope of the proposed modification. It would therefore seem logical to update the title as proposed to align with this.