

Code Administrator Consultation Response Proforma**CMP428: User Commitment liabilities for Onshore Transmission (reinforcement) 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 18 April 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 Claire Goult Claire.goult@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Sarah Graham	
Company name:	Ocean Winds	
Email address:	sarah.graham@oceanwinds.com	
Phone number:	07464675593	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> 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 against the Applicable Objectives?	<p>Mark the Objectives which you believe the proposed 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>Ocean Winds supports the Original Proposal as this better facilitates CUSC objectives. The modification is expected to enhance the number of offshore wind generation projects that become feasible and the number of projects being able to go ahead. The imposition of steep initial securitisation demands in grid connection agreements poses an enormous obstacle to entry and risks impacting offshore wind deployment scenarios. If this modification was not taken forward, certain projects may face abandonment.</p> <p>Tackling a recognised barrier to the development of offshore wind projects will facilitate effective competition in generation.</p> <p>Providing clarity on what assets constitute Attributable Works for offshore wind generation projects will promote efficiency in the administration of the CUSC.</p>
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/> Original <input type="checkbox"/> Baseline <input type="checkbox"/> No preference</p> <p>The Original solution ensures that onshore transmission reinforcement that has wider system benefit is not securitised by only one User or a small group of Users and therefore provides better cost reflectivity for liabilities.</p>
3	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>
4	Do you have any other comments?	It is noted that the definition of Excepted Works only covers asset classification from the HND report and Beyond 2030 report. As noted in the consultation document under "Output of Special CUSC Panel 12 April

		2024", the definition of Excepted Works should be expanded to include asset classification from any future CSNP once CSNP has been included in the ESO's Transmission Licence.
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