

Code Administrator Meeting Summary

Meeting name: CMP434 & CM095 Workgroup 7

Date: 11/06/2024

Contact Details

Chair: **Claire Goult** Claire.Goult@nationalgrideso.com

Proposer: **Graham Lear** graham.lear@nationalgrideso.com

Key areas of discussion

The key areas for discussion in Workgroup 7 are:

- Significant Change/Material Technology Change
- Gate 2 process (including how DNOs notify the ESO of Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations which meet Gate 2 criteria)
- Gate 2 Criteria Update/Evidence Submission Process

The Chair noted quoracy and began the Workgroup.

Scene Setting – Workgroup 7

The Proposer stated the Capacity Holding Security has been removed from this modification, and that it may be raised in a new modification. The Proposer stated they were considering adding a longstop date, but this was still in development. Workgroup members were asked to provide ideas on incentives to reduce speculative applications in Gate 1.

Significant Change / Material Technology Change

ESO SMEs discussed what qualified as a significant change. The ESO noted that further changes were required following the removal of Capacity Holding Security from the scope of the modification and agreed to update the significant changes guidance to reflect this. The Workgroup did not reach a consensus on whether principle-based guidance or an exhaustive list for significant change would be most useful.

The ESO outlined the process flow for Modification Applications requesting a technology change, including the process for determining whether the technology change request would constitute a significant change. This process is applicable for transmission-connected customers, as it is expected that distribution-connected customers will follow separate existing processes around reallocation of capacity. One Workgroup member questioned if the removal of technology should always be allowed, and not considered a significant change. One Workgroup member also questioned if all technology change requests should be considered at the back of the queue to avoid confusion in the categories of modification applications. Another Workgroup member questioned if a Modification Application for a technology change post-Gate 2 could result in a changed point of connection, which may implicate land requirements.

ESO SMEs discussed what types of technology changes would be allowed. One Workgroup member sought clarification on the queue position for Gate 2 Modification Applications around technology change. The ESO clarified that, Gate 2 queue positions are based on the time at which the Gate 2 criteria is met within the respective Gate 2 batch.

Several Workgroup members noted that the term 'significant' was confusing and requested that the ESO change the terminology regarding this. Several Workgroup members also noted that the term 'material effect' is already defined in the CUSC and that a different terminology should be used in relation to material impacts that determine whether a change is 'significant'. The ESO agreed that it will consider this when drafting the guidance document.

Gate 2 Process

The ESO shared an updated timeline slide. The ESO outlined the proposed process and timeline for Gate 2, clarifying that projects applying to earlier windows would get connection dates earlier than those applying in later Gate 2 application windows. One Workgroup member had feedback regarding the timings of the Gate 2 windows, noting that they thought it would be better to have them at the same time as Gate 1 application windows. This Workgroup member stated they were likely to raise an alternative including this idea. An area on the collaboration space was created so that potential alternatives could be shared and discussed.

Several Workgroup members also highlighted a discrepancy between the treatment of Transmission and Distribution connected projects with the view that it is only Relevant Embedded Small/Medium Power Station projects that would be able to utilise the first Gate 2 window in 2025.

The ESO discussed the process for how DNO's notify the ESO of Relevant Small/Medium power stations which meet Gate 2 criteria. A Workgroup member asked why allow DNO's to submit singular projects rather than batched, the ESO stated this was due to some DNO's currently submitting singular projects. A DNO SME clarified that the Gate 2 clock starts from when the Gate 2 criteria was met, rather than when the DNO processes the application. Multiple Workgroup members stated they believed the current Gate 2 process would lead to many projects swapping from Transmission to Distribution connected.

Query Log and Action Review

A Workgroup member asked for the query log to be reformatted.

The Chair reviewed the actions they were going to add, Workgroup members provided feedback on action 23.

Actions 18 and 19 were closed as Capacity Holding Security has been removed.

The Chair asked if Action 1 should be closed, as a Workgroup member provided a [ENA webpage](#) that provided some of the requested data. Some Workgroup member believe that more information regarding the transmission queue should be shared before action 1 can be closed.

Action 8 and 9 were closed due to DNO obligations being outside of the scope of CMP434 or CM095.

Any Other Business

Workgroup members stated that bay reservation needs further discussion, whereas the ESO believe the point has been fully discussed.

Actions

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
1	WG1	PM	To share further data is shared in relation to the transmission queue	Link to ENA webpage	TBC	Closed
8	WG2	AP	Consider the definition of Relevant Embedded Small/Medium Power Station and whether the codified definition needs to be changed or if the ESO is to provide guidance to DNO's outside of the energy codes on what is considered as relevant to the transmission network	Closed due to DNO obligations being outside of the scope of CMP434 or CM095	TBC	Closed
9	WG2	AP	Slide on Large Embedded for clarification	Closed due to DNO obligations being outside of the scope of CMP434 or CM095	WG4	Closed
11	WG2	JH/DD	Response to the paper provided by Simon Lord	Ongoing	WG4	Open
12	WG2	JH	ESO to speak to the policy team and consider how the 'Allowable Changes' policy being drafted would interact with CMP434, would all of the policy need to be codified or does the concept of the policy need to be codified?	Ongoing	WG4	Open
13	WG2	ALL	Workgroup to continue to add thoughts in relation to discussion of significant and minor changes		TBC	Open
15	WG4	JH	Consider alignment of crown estate invitation to tender and auction timing		TBC	Open
17	WG5	FP	Are the duplication checks at Gate 2 against projects who are within the Gate 2 applicants pool of that period, Gate 2 applicants that are yet to accept their offer, or/and applicants who have accepted their Gate 2 offer	Will be picked up in a later Workgroup	TBC	Open
18	WG6	RE/MO	Share table and/or visual outlining the difference between the ESO/TO costs covered by an application fee and the TO costs	Closed as Capacity Holding Security	TBC	Closed

			covered by the proposed capacity holding security.	has been removed		
19	WG6	RE/MO	Share a worked example of how the capacity holding security would (in theory) be apportioned between directly connected and relevant small and medium embedded generation projects, using a hypothetical £1/MW value.	Closed as Capacity Holding Security has been removed	TBC	Closed
20	WG6	JN/AQ	Consider legal perspective on NESO designation		TBC	Open
21	WG6	MO	Update/develop slides presented based on Workgroup feedback		TBC	Open
22	WG6	JH	Consider if an impact assessment by the ESO on the proposed solution is achievable within the current timescales		TBC	Open
23	WG7	LH	Clarify the ESO Position as to why the capacity reallocation process is out of scope for CMP434		TBC	New
24	WG7	MO	Consult ESO legal team to consider using existing legal definitions for clarification (substantial modification) and reconsider terminology being used (material/significant/allowable)		TBC	New
25	WG7	LH/SG	Update on the Technology Change Policy Paper and consider request to share prior to consultation		TBC	New

Attendees

Name	Initial	Company	Role
Claire Goult	CG	Code Administrator, ESO	Chair
Lizzie Timmins	LT	Code Administrator, ESO	Chair
Andrew Hemus	AH	Code Administrator, ESO	Tech Sec
Stuart McLarnon	SM	Code Administrator, ESO	Tech Sec
Graham Lear	GL	ESO	Proposer
Angela Quinn	AQ	ESO	ESO SME
Alison Price	AP	ESO	ESO SME
Dovydas Dyson	DD	ESO	ESO SME
Michael Oxenham	MO	ESO	ESO SME

Laura Henry	LH	ESO	ESO SME
Sabrina Gao	SG	ESO	ESO SME
Lee Wilkinson	LW	Ofgem	Authority Representative
Alex Ikonic	AI	Orsted	Workgroup Member
Allan Love	AL	Scottish Power Transmission	Workgroup Member
Andy Dekany	AD	NGV	Workgroup Member
Anthony Cotton	AC	Green Generation Energy Networks Cymru Ltd	Workgroup Member
Bill Scott	BC	Eclipse Power Networks	Workgroup Member
Brian Hoy	BH	Electricity North West Limited (ENWL)	Workgroup Member
Callum Dell	CD	Invenergy	Workgroup Member
Claire Hynes	CH	RWE Renewables	Workgroup Member
Claire Witty	CW	Scottish Power Energy Networks	Workgroup Member
David Tuffery	DT	NGED	Workgroup Member
Deborah MacPherson	DM	Scottish Power Renewables	Workgroup Member
Ed Birkett	EB	Low Carbon	Workgroup Member
Garth Graham	GG	SSE Generation	Workgroup Member
Grant Rogers	GR	Qualitas Energy	Workgroup Member
Greg Stevenson	GS	SSEN Transmisson (SHET)	Workgroup Member
Helen Stack	HES	Centrica	Workgroup Member
Hooman Andami	HA	Elmya Energy	Workgroup Member
Joe Colebrook	JC	Innova Renewables	Workgroup Member
Kyran Hanks	KH	CUSC Panel member	Workgroup Member
Luke Scott	LS	Northern Powergrid	Workgroup Member
Mark Field	MF	Sembcorp Energy (UK) Limited	Workgroup Member
Michelle MacDonald Sandison	MS	SSEN	Workgroup Member
Mireia Barenys	MB	Lightsourcebp	Workgroup Member
Mohammad Bilal	MB	UK Power Networks	Workgroup Member
Mpumelelo Hlophe	MH	Fred Olsen Seawind	Workgroup Member
Paul Jones	PJ	Uniper	Workgroup Member
Paul Youngman	PJ	Drax	Workgroup Member

Phillip Addison	PA	EDF Renewables	Workgroup Member
Ravinder Shan	RS	FRV TH Powertek Limited	Workgroup Member
Richard Woodward	RW	NGET	Workgroup Member
Rob Smith	RS	Enso Energy	Workgroup Member
Simon Lord	SL	ENGIE	Workgroup Member