

# Code Administrator Meeting Summary

## Meeting name: CMP434 & CM095 Workgroup 8

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Date: 13/06/2024

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### Contact Details

Chair: **Claire Goult** [Claire.Goult@nationalgrideso.com](mailto:Claire.Goult@nationalgrideso.com)

Proposer: **Graham Lear** [graham.lear@nationalgrideso.com](mailto:graham.lear@nationalgrideso.com)

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## Key areas of discussion

The key areas for discussion in Workgroup 8 were:

- Gate 2 Criteria Update
- Gate 2 Planning Update
- Gate 2 - Evidence Submission Process
- DFTC Submission

The Chair noted quoracy and began the Workgroup.

### **Gate 2 Criteria Update**

The ESO outlined updates to their solution on Gate 2 criteria, noting that secured land will be a G2 criteria.

Workgroup members noted concerns around the impact of developers using option agreements for secured land, and the up to 7 year longstop date, noting there should be tolerance for scenarios where options may expire or where extensions may be required.

There was significant discussion on ensuring ongoing compliance with secured land, with one Workgroup member highlighting that the ESO will need to review documentation to ensure developers are not using loopholes in the system to their advantage. The ESO clarified that the X% limit on change to land boundaries would begin from Gate 2, when land rights are assigned, with an exception allowed for changes identified specifically by the Planning Authority. Several Workgroup members noted that a 33% change in land boundaries should be required, to mirror the 50% increase in land boundaries that is used by DNOs such as NGED. One Workgroup member noted that if the M1 milestone is further away from Gate 2 acceptance, there would likely be increased changes to land boundaries.

### **Gate 2 Planning Update**

The ESO noted that they require evidence for Queue Management Milestone M1 and highlighted some proposed time periods from Gate 2 Offer acceptance to submission of application for Planning Consents.

One Workgroup member noted that the proposed timelines could cause issues with projects with connection dates far into the future which require large scale reinforcement. Other Workgroup members had concerns regarding risks to developers of completing surveys when it is not clear if their projects are viable, noting that cable routes are a significant proportion of survey costs for onshore projects, and it is often unclear initially which substation the cables would be connecting to. One Workgroup member noted that developers will require more confidence in what they will receive in Gate 2 if timelines are to be brought forward. One Workgroup member noted some alternative options for Gate 2 criteria, to allow developers to prove their intent to connect by showing that the project has a viable monetisation route or that they are considering how to build the assets.

**Gate 2 - Evidence Submission Process**

The ESO noted that they would now require evidence for secured land as part of the Gate 2 criteria evidence, with the ESO/DNOs checking that all self-certifications meet the Gate 2 criteria. The ESO noted that they would sample check applications (including duplication checks).

Workgroup members noted that the percentage of applications sample checked should be defined by the Authority and should be consistent across Transmission and Distribution. Several Workgroup members suggested the ESO should conduct duplication checks on all projects, not just a sample. Workgroup members noted that it would be easy for ESO to conduct duplication checks on all projects should customers be required to submit a GIS file containing their red line boundary at Gate 2. Several Workgroup members also noted that Users should be provided with guidance and support with the process.

**DFTC submission**

The ESO shared a slide on DFTC submission.

Several Workgroup members again highlighted a perceived discrepancy between the treatment of Transmission and Distribution connected projects. A workgroup member asked for the process to be transparent, and for visibility of volumes submitted to DNO’s and visibility of when they are allocated.

Workgroup members from both Distribution and Transmission connection viewpoints asked for the customer journey to be considered and a level playing field for both. A Workgroup member highlighted the difference between the associated fees of the Transmission and Distribution connection processes.

**Query Log and Action Review**

The Chair reviewed the actions. The Chair highlighted Action 26, which has now been added to the action log. Action 12 was closed, with the ESO clarifying their intention not to codify the Allowable Changes policy.

**Any Other Business**

The Chair presented a slide highlighting the Code Modification Process, drawing particular attention to the raising of a WACM or a WASTM detailing how and when this can be done and the Alternative vote for bringing these into existence.

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**Actions**

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Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
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11	WG2	All	Add agenda time to respond to papers provided by Workgroup members	Ongoing	WG4	Open
12	WG2	JH/PM	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?	Proposer clarified the intention for this not to be codified.	WG4	Closed
13	WG2	ALL	Workgroup to propose what they think could change in their application between Gate 1 and Gate 2		TBC	Open
15	WG4	JH	Consider alignment of crown estate invitation to tender and auction timing		TBC	Open
16	WG5	RW/GL	Look into where STC changes for CNDM should be located within main body of STC and STCPs	Later WG		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	Later WG		Open
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	Open
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	Open
25	WG7	LH/SG	Update on the Technology Change Policy Paper and consider request to share prior to consultation		TBC	Open

26	WG7	SMEs	Provide a list of policy documents envisaged for TMO4+ and for which details are not within scope of CMP434 (e.g.CNDM). Also provide a list of their contents/principles the documents are using if not available for the WG consultation	TBC	Open
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**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
Michael Oxenham	MO	ESO	ESO SME
Paul Mullen	PM	ESO	ESO SME
Lee Wilkinson	LW	Ofgem	Authority Representative
Liam Cullen	LC	Ofgem	Authority Representative
Alex Ikonic	AI	Orsted	Workgroup Member
Allan Love	AL	Scottish Power Transmission	Workgroup Member
Andrew Yates	AY	Statkraft	Workgroup Member
Andy Dekany	AD	NGV	Workgroup Member
Anthony Cotton	AC	Green Generation Energy Networks Cymru Ltd	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
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 Snodin	HS	Fred Olsen Seawind	Workgroup Member
Helen Stack	HES	Centrica	Workgroup Member
Hooman Andami	HA	Elmya Energy	Workgroup Member
Joe Colebrook	JC	Innova Renewables	Workgroup Member
Kimbrah Hiorns		EDF Renewables	Workgroup Member
Kyran Hanks	KH	CUSC Panel member	Workgroup Member
Luke Scott	LS	Northern Powergrid	Workgroup Member
Magdalena Paluch	MP	NGED	Workgroup Member
Mark Field	MF	Sembcorp Energy (UK) Limited	Workgroup Member
Michelle MacDonald Sandison	MS	SSEN	Workgroup Member
Mireia Barenys	MB	Lightsourcebp	Workgroup Member
Paul Jones	PJ	Uniper	Workgroup Member
Paul Youngman	PJ	Drax	Workgroup Member
Ravinder Shan	RS	FRV TH Powertek Limited	Workgroup Member
Richard Woodward	RW	NGET	Workgroup Member
Rob Smith	RS	Enso Energy	Workgroup Member
Zivanayi Musanhi	ZM	UK Power Networks	Workgroup Member