

CMP435 & CM096

Application of Gate 2 Criteria to existing contracted background

Workgroup Meeting 19, 19 September 2024

Online Meeting via Teams

WELCOME



Agenda

Topics to be discussed	Lead
Timeline	Chair
Updates <ul style="list-style-type: none">• Ofgem Open Letter• Connections Reform Event	All
Scene Setting – Workgroup 19	Proposer
CMP435 Alternative Requests Update	
Action Log	Chair
Any Other Business	Chair
Next Steps	Chair

Timeline

Catia Gomes – ESO Code Administrator

CMP435 and CM096 Application of Gate 2 Criteria to existing contracted background

Pre-Workgroup	
Proposal raised	19/04/2024
Proposal submitted to Panel	26/04/2024
Workgroup Nominations	26/04/2024 - 02/05/2024
Urgency Decision	01/05/2024
Workgroups	
Workgroup 1	07/05/2024
Workgroup 2	15/05/2024
Workgroup 3	23/05/2024
Workgroup 4	29/05/2024
Workgroup 5	04/06/2024
Workgroup 6	12/06/2024
Workgroup 7	19/06/2024
Workgroup 8	27/06/2024
Workgroup 9	03/07/2024
Workgroup 10	10/07/2024
Workgroup 11	19/07/2024
Workgroup 12	23/07/2024
Workgroup 13	24/07/2024
Workgroup Consultation	25/07/2024 - 06/08/2024
Workgroup 14	14/08/2024
Workgroup 15	22/08/2024
Workgroup 16	29/08/2024
Workgroup 17	04/09/2024

Workgroup Continuation		Key Objectives*
Workgroup 18	12/09/2024	CMP435 ToR Discussion/Action log; CM096 ToR Discussion/Action Log
Workgroup 19	18/09/2024	Alternative Requests Update and Vote
Workgroup 20	26/09/2024	CMP435 Draft Original Legal Text Discussion; CMP435 Draft WACM Legal Text Discussion;
Workgroup 21	04/10/2024	CMP435 Workgroup Report Discussion; CM096 Workgroup Report Discussion
Workgroup 22	10/10/2024	CM096 Overview and Draft Legal Text Discussion;
Workgroup 23	17/10/2024	CMP435 Finalise Workgroup Report; CM096 Finalise Workgroup Report Discussion
Workgroup 24	24/10/2024	Complete sign off of ToR and Workgroup Vote
Workgroup 25	29/10/2024	Final Review of Workgroup Reports

Post Workgroups		Key info
Workgroup Report submitted to Panel	05/11/2024	
Panel to agree whether ToR have been met	08/11/2024	Special Panel to be arranged
Code Administrator Consultation	11/11/2024 - 22/11/2024	9 Business Days
Code Administrator Consultation Analysis and DFMR generation	25/11/2024 - 12/12/2024	13 Business Days
Draft Final Modification Report to Panel	13/12/2024	
Panel Recommendation Vote	20/12/2024	Special Panel to be arranged
Final Modification to Ofgem	20/12/2024	
Decision Date	Q1 2025	
Implementation Date	Q2 2025	

* Workgroup meetings will continue to include other relevant topics alongside the key objectives

Updates

ALL

Workgroup 19 Scene Setting

Alice Taylor, Proposer

Meeting Objectives

What is the focus of the meeting?

- To review new Alternative Requests raised

What is the ask of the workgroup?

- To gain an understanding of the Alternative Requests
- Provide feedback on the Alternative Requests

What is the desired output of the meeting?

- To have a clear understanding of the Alternative Requests in case they are brought forward to the vote

What should not be discussed?

- Feedback on the Original Solution

CMP435 Alternative Requests Update

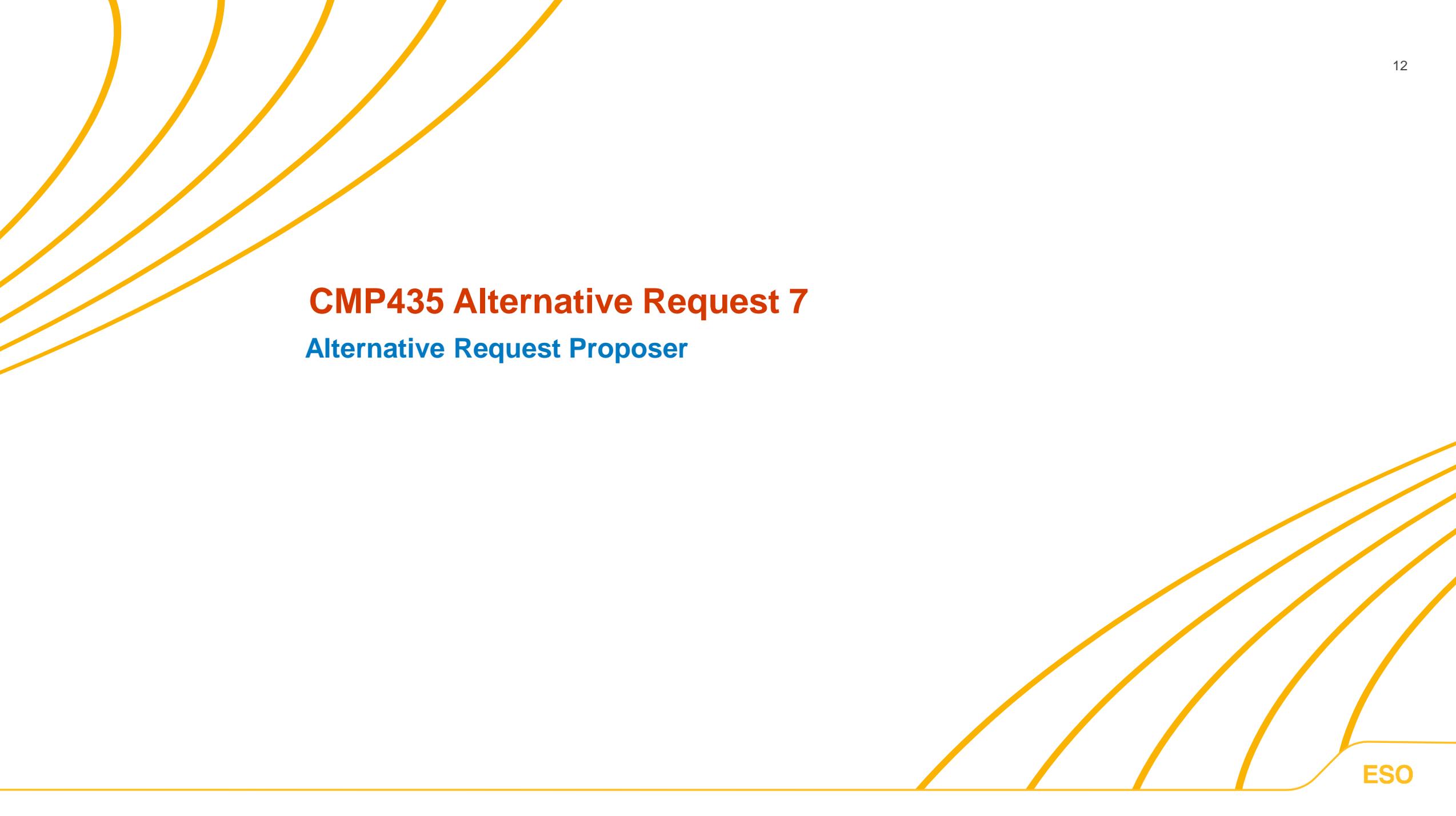
Catia Gomes– ESO Code Administrator

Alternatives Summary

<u>Number</u>	<u>Proposer Name</u>	<u>Proposer Organisation</u>	<u>What does this Alternative suggest?</u>	<u>Update post Workgroup 20</u>
1	Jonathon Hoggarth	EDF	This Alternative proposes to implement a transition period of 6 months from the implementation period in order to allow the Gate 2 criteria to be achieved by existing contracted parties with viable projects.	Proposer is considering the feedback received, waiting on update
2	ED Birkett	Low Carbon	This Alternative Request would require the ESO to implement changes to existing agreements via Agreements to Vary.	Formally withdrawn 02.09.24
3	Grant Rogers	Q-Energy Sustainable Investments Ltd	Remove Element 14 from the proposed solution to ensure focus on the project and land requirements at application stage and ensure applicants are subject to requirements at Gate 2.	With the Proposer to be formally withdrawn
4	Will Wason	Orron Energy	The proposal is a fairer and more balanced approach that will ensure a reduction of TEC Queue, whilst also enabling a sensible transition period to enable roll-out of viable renewable energy projects in order to reach the UK Net Zero targets.	Not currently proceeding as a submission
5	Phillip John	Epsilon	This Alternative proposes that planning consent is included within the gating processes as either a requirement for Gate 2 or for the creation of a new gate, "Gate 3". This will encourage developers to focus on less speculative projects and will allow the ESO and TOs to focus resources on projects that are "ready to build" and need fast connections. I think this is what you mean here?	Waiting update
6	Steffan Jones	ENWL	To introduce a (significant) Financial Instrument to the Gate 2 Criteria, potentially in the form of a £/MW non-refundable deposit.	ESO speaking to Steffan directly to discuss in relation to the Financial Instrument modification. Waiting feedback on Critical Friends check
7	Garth Graham	SSE Generation	(In association with a twin CMP434 Alternative Request) Retention of pre-reform contracts/agreements for existing projects, with exemptions for i) projects with a connection/accepted offer prior to 02 Sept 2024 and a secured Government Support Contract, or ii) offshore wind projects with a connection/accepted offer prior to 02 Sept 2024 that are necessary to deliver Government plans. Acknowledgement of an Application Window and replacement of Gate 2 criteria with CMP376 QM milestones and financial commitment.	Alternative Request received 11 Sept 2024 for critical friend checks

Alternatives Summary

<u>Number</u>	<u>Proposer Name</u>	<u>Proposer Organisation</u>	<u>What does this Alternative suggest?</u>	<u>Update post Workgroup 20</u>
8	Helen Sodin	Muir Mhor Offshore Wind Farm Ltd	<p>This Alternative is proposing that in addition to land requirements, projects entering Gate 2 should:</p> <ul style="list-style-type: none"> • receive a grid offer date based on completion of local works only, and from go-live have either submitted planning or post additional security up to planning submission • Full TEC would be awarded at the FID milestone – with CFD budgets and awards tailored to available Connect and Manage capacity and government priorities on technology mix 	Alternative Request received 17 Sept 2024 for critical friend checks
9	Rob Smith	ENSO Energy	<p>This Alternative is proposing:</p> <ul style="list-style-type: none"> • That the results of the Gate 2 compliance check should be published immediately – including any revised Transmission Entry Capacity (TEC) or technology change requests • A 2- to 4 week pause should be implemented for Gate 2 qualified applicants to assess the viability of their projects in light of updated competitor information, To understand the Clean Power Plan for 2030 (CPP30)CP2030 regional technology quota proposals that we understand will emerge, and any NESO project designation activity that has been undertaken. • Parties could then choose to submit an application for capacity advancement, keep their project as is or withdraw (with no penalty) • The TO/ESO network investment would then proceed as under the original proposal, but in our view with a much more credible portfolio of generation projects which will reduce the risk of stranded assets and consumer costs. 	Alternative Request received 17 Sept 2024 for critical friend checks



CMP435 Alternative Request 7

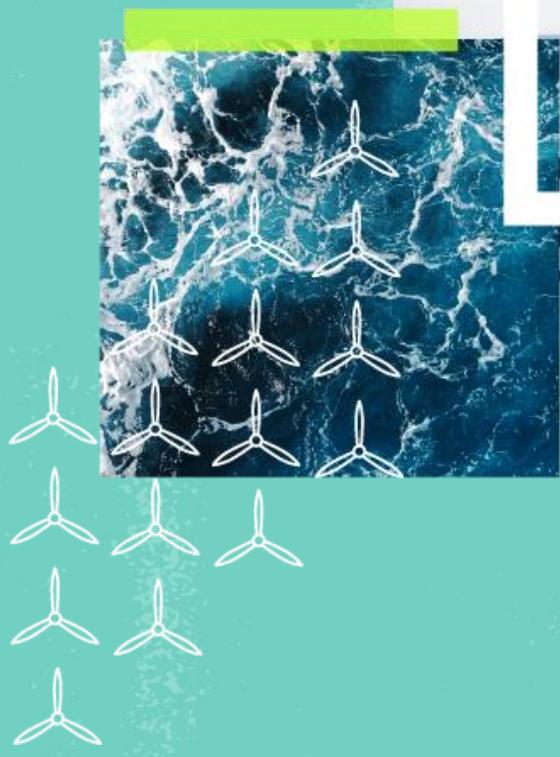
Alternative Request Proposer



SSE Generation

CMP434 and CMP435
Alternative Code modification proposals

Garth Graham



Our objective

To develop an enduring strategic approach to allocating finite Transmission capacity that supports delivery of net zero to the benefit of consumers

That:

1. Gives genuine project developers the certainty / investor confidence they need to progress their projects;
2. Drives the 'right' balance of projects / technologies needed to deliver a secure GB energy system; and
3. Discourages capacity hoarding

Note:

- Connections Reform is a key element in delivering net zero but will not deliver net zero in isolation
 - This will also require planning reform, changes to enable timely network investment and market reform

Starting point for Alternative proposals

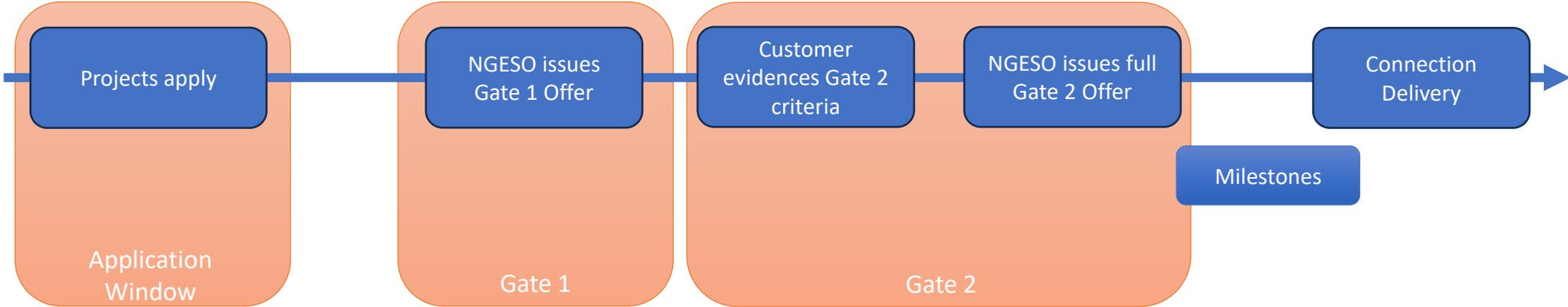
Fundamentally:

- Allocating capacity based on 'first-ready' results in flawed and inefficient allocation of scarce Transmission capacity
- Evolving Gate 2 criteria sends unreliable investment signals to project developers with no clear 'end point'
- Scarcity rent paid to landowners to meet TMO4+ is unrecoverable

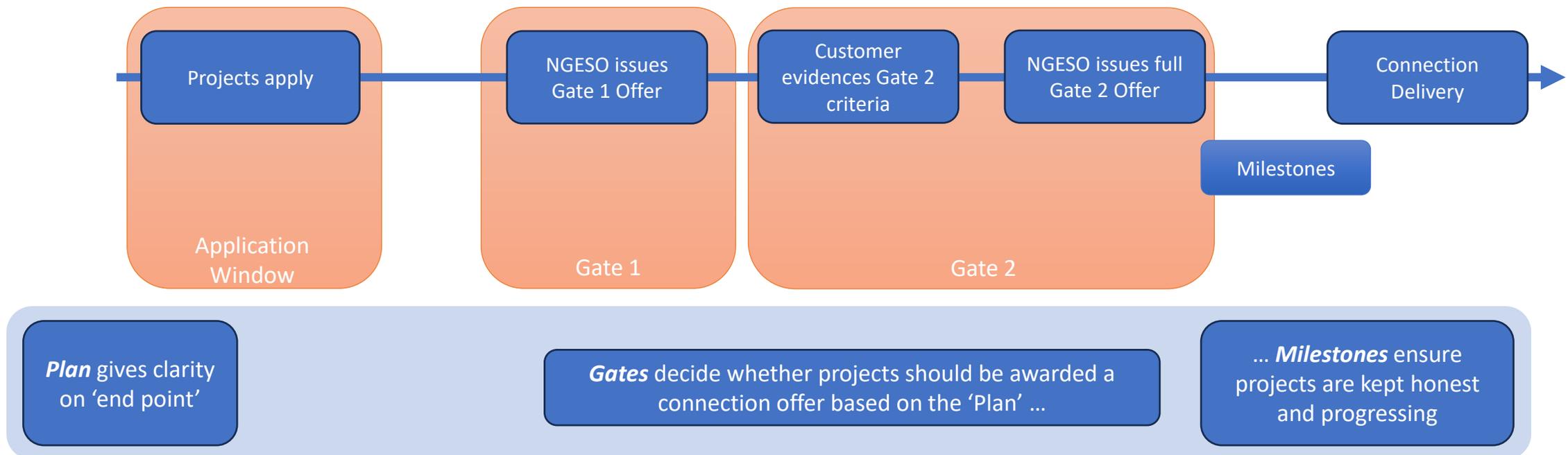
Further:

- Alignment with the SSEP has been well-signposted
 - And new Government's commissioning of CPP30 makes strategic planning a nearer-term reality
- We know:
 - Readiness cannot be an enduring criterion; and
 - Not everything that has an offer can connect
- Connections process needs radical reform; and investors need certainty
 - These Alternative proposals seek to enable this radical reform whilst giving investors certainty as early as possible

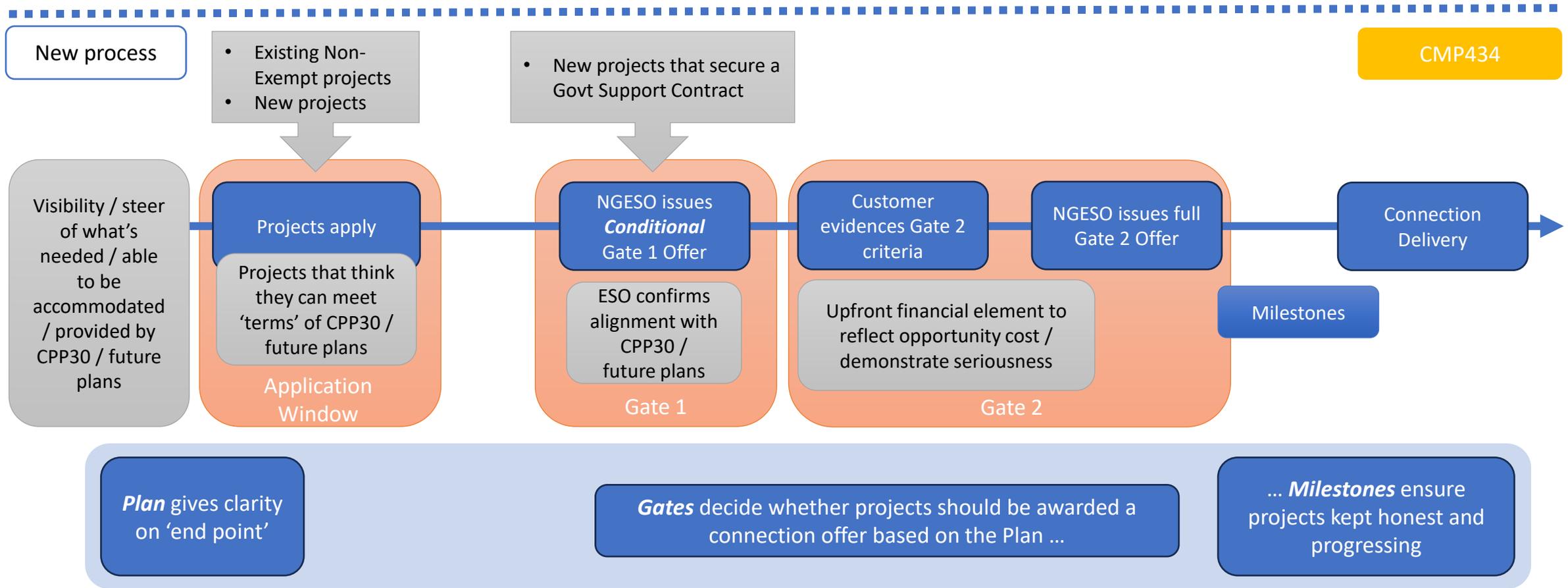
TMO4+ model



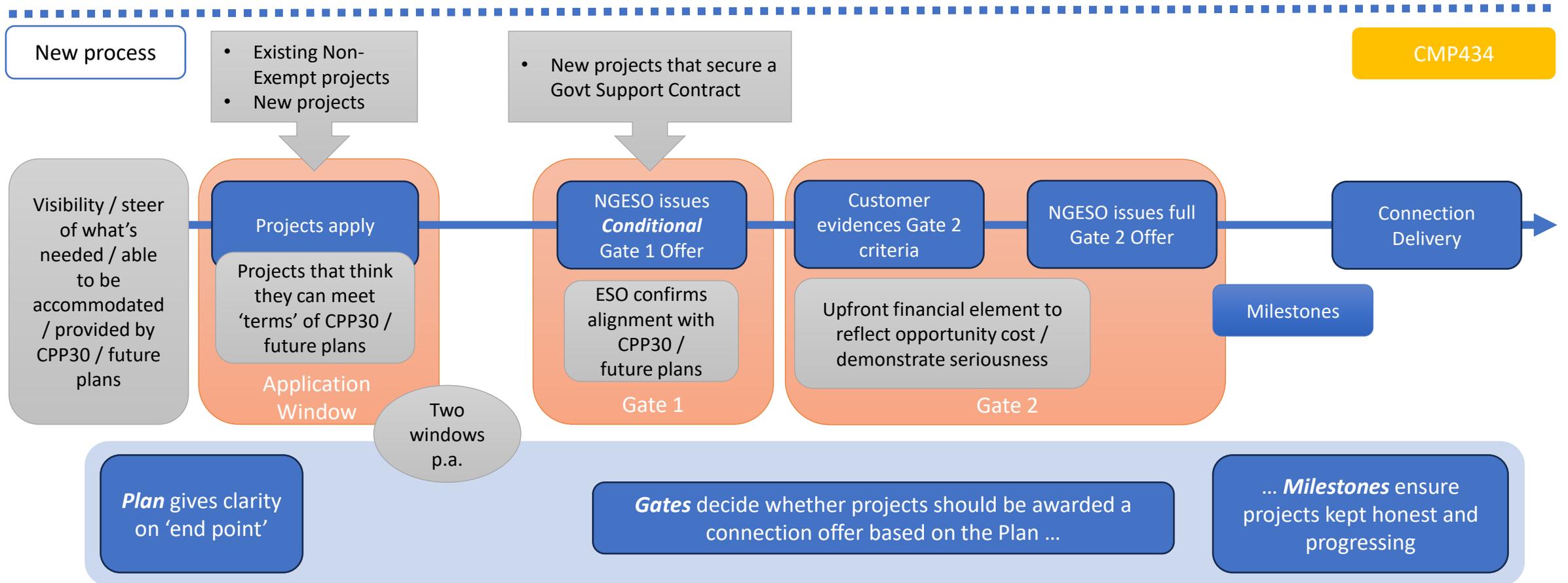
The role of Gates vs Milestones



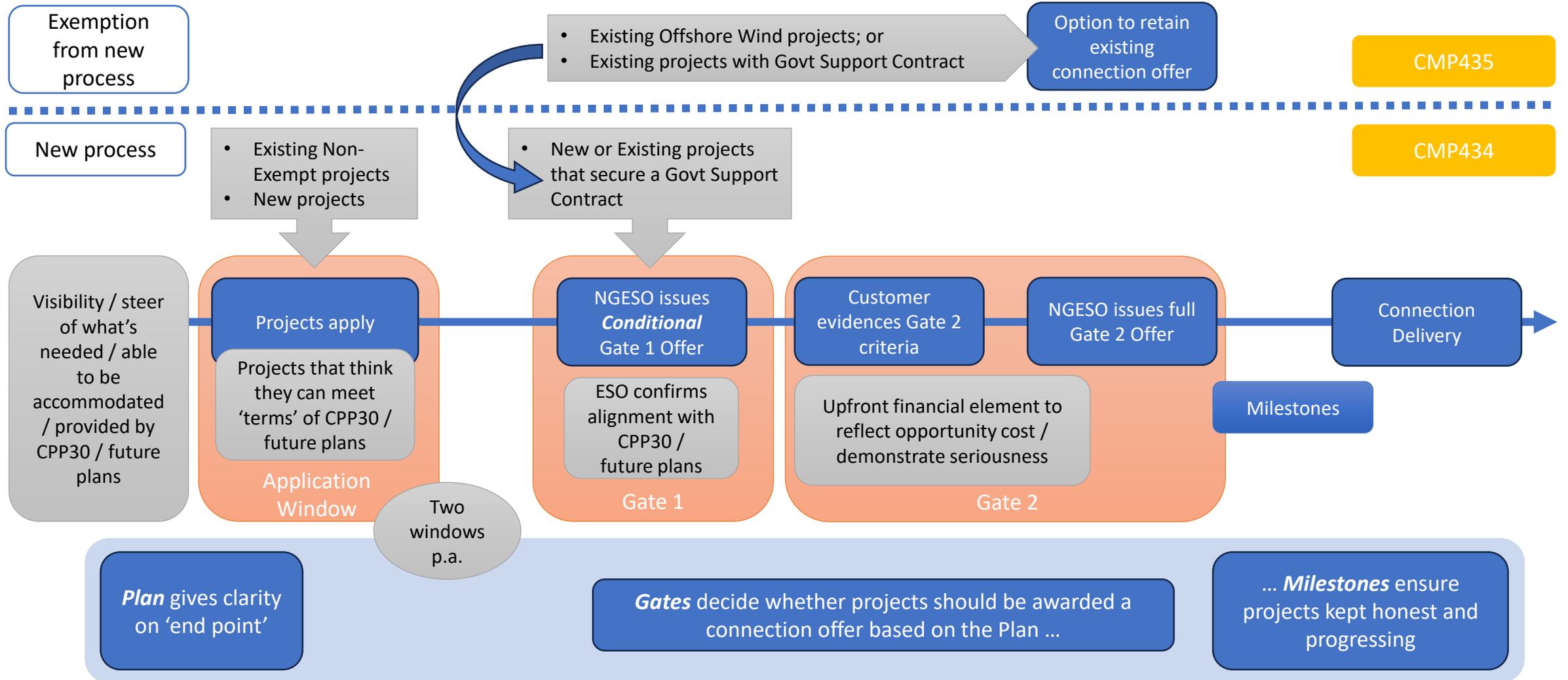
Alternative proposal



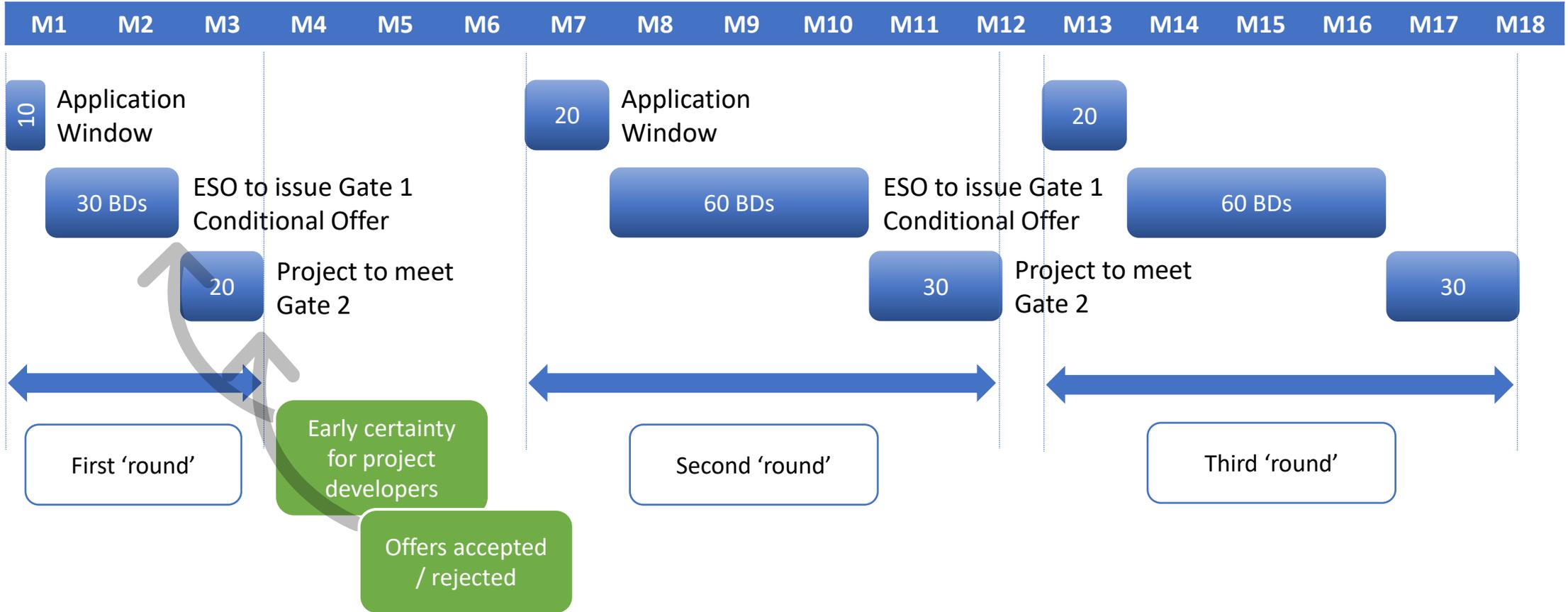
Alternative proposal



Alternative proposal



Timeline



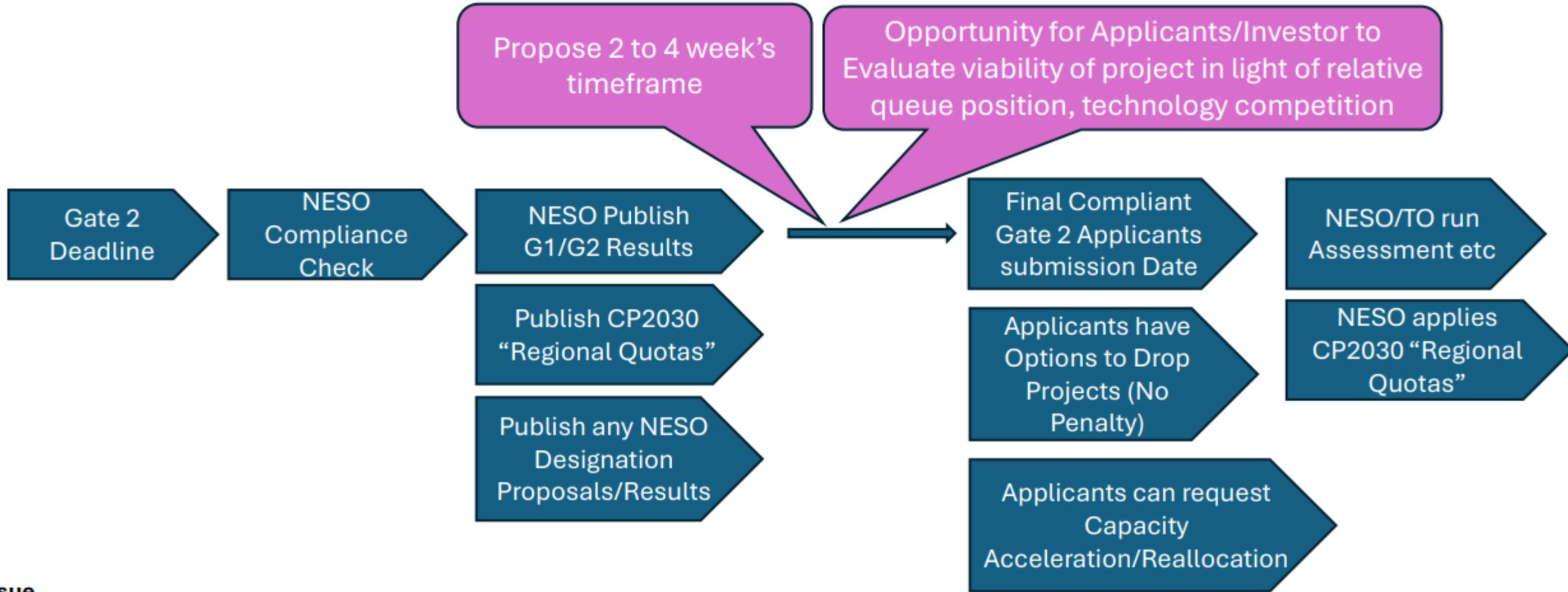
Key points of difference

- Gate 1 offer is conditional (rather than indicative)
 - Provides developers with earlier certainty over their connection offer
- Removal of the need to demonstrate land before being awarded a firm connection offer
 - Replaced by a significant upfront financial payment (see future ESO mod)
 - Suggest this doesn't change the cost of connection, but rather the timing of payment
 - Enables an expedited timetable and two Application Windows per annum, which removes requirement for forecasting at Distribution
- Assurances for existing Govt-backed projects that they can retain their existing (pre-connections reform) offer; thereby minimising disruption to project delivery programmes
 - It is proposed this applies to offshore wind and projects that have existing Government Support Contracts
- Early assurances on grid connection for projects that obtain Govt Support Contracts
 - It is assumed such projects will align with the CPP30 / future plans
 - Avoids a potentially damaging hiatus on long lead-time projects that rely on yet-to-be-developed plans beyond CPP30
- A claim mechanism for projects that have invested in good faith under the current process but now no longer viable

CMP435 Alternative Request 8
Alternative Request Proposer

CMP435 Alternative Request 9
Alternative Request Proposer

CMP435 Proposal (Unsure whether should apply to CMP434 On Ensuring Basis)



Issue

- Currently Applicants suffer from lack of clarity on the viability of competitor projects in the queue.
- This uncertainty leads to inefficient decision making as projects are taken forward based on risk appetite rather than strong project economic fundamentals

Benefit

- Developers make more efficient decision making (driven by market fundamentals)
- ESO/TO can undertake network assessment based on smaller portfolio of more credible projects

Actions Log

Catia Gomes – ESO Code Administrator

<u>Action number</u>	<u>Workgroup Raised</u>	<u>Owner</u>	<u>Action</u>	<u>Comment</u>	<u>Due by</u>	<u>Status</u>
21	WG3	AC / FP	When considering transitional arrangements, include guidance for staged projects	To be covered in more detail under Phase 2	Ongoing	Open
36	WG5	Angie	Statement from ESO as to the CAP150 powers and how they are applied /can be applied re: ongoing compliance (include link to CAP150 info on ESO website)	Agreed to await further legal text review on this before closing	Ongoing	Open
42	WG6	AC/FP	Check with legal as to the clock start dates for new applications considering the point of implementation after an Authority decision (is 15th of November date is legally acceptable as the Gate 1 process only comes to existence 10 Working days after Authority decision?)		Ongoing	Open
56	WG8	MO	Clarification with legal regarding guidance and introduction of any new obligations	Clarity on this should be provided by the legal text	Ongoing	Open
57	WG8	MO	ESO set out the processes and timing for determining liability and security for April 2025 and October 2025	This action have been changed by the TBC change to implementation and go-live timescales and so we will need to newly answer this once we have clarified the revised dates.	Ongoing	Open
59	WG8	MO	Provide WG with the list of documents outside the mod, the principles for guidance docs and timelines for the development of methodology documents.	Awaiting for methodology content and timescales before the ESO can update on this	Ongoing	Open
60	WG8	RP	(Replacement for Action 35) Provide relevant updates from SCG.	No further updates as of 12/09	Ongoing	Open

<u>Action number</u>	<u>Workgroup Raised</u>	<u>Owner</u>	<u>Action</u>	<u>Comment</u>	<u>Due by</u>	<u>Status</u>
79	WG10	MO	Develop a diagram for consultation for alignment of methodologies' timings vs the modifications	Post Workgroup Consultation	Ongoing	Open
80	WG10	MO	Provide further clarity on the nature of the projects designated in 2025, and separately those projects would have reserved capacity	Further clarity will be provided on designation once draft methodology is available. No further clarity available at this stage in relation to capacity reservation.	Ongoing	Open
84	WG11	PM/HS	To discuss how to make Offshore projects holding offers in scope of the modification	Ongoing discussions between Connections and Offshore Coordination team and have spoken to Helen	Ongoing	Open
85	WG11	TBC	Comeback to WG with Justification on proposals on exempting mod apps from implementation date		Ongoing	Open
89	WG14	MO	STC solution to expand on intended process and contract changes (particular importance for TOs)	Meeting arranged with TOs for Monday 2nd Sept with outcome to be fed back to the workgroup	Ongoing	Open

<u>Action number</u>	<u>Workgroup Raised</u>	<u>Owner</u>	<u>Action</u>	<u>Comment</u>	<u>Due by</u>	<u>Status</u>
93	WG14	ESO Connections Team	Update on the pathway of modifications in relation to the wider Reform package	ESO general update from Robyn Jenkins in WG15. Further updates to be shared with the Workgroup ESO session arranged for 16 th September	Ongoing	Open
94	WG15	ESO Connections Team	Clarification sought on whether the change to assess whether projects are needed introduces any risk to projects before the new arrangements go live (in context of an investment hiatus).	“Potential to apply a technology lens to Connections Reform event”	Ongoing	Propose to close
96	WG15	PM	CNDM team to be asked how existing projects not meeting Gate 2 will be factored into the CNDM (in case of any consequential issues for removing the Gate 1 longstop)		Ongoing	Open
98	WG15	PM	To check if TEC reduction will still mean projects are open to liabilities	This is part of the CNDM debate with ongoing discussions.	Ongoing	Open
99	WG15	PM	ESO to consider the new proposed reforms to National Planning Framework for nationally significant solar projects and any impacts for the Planning Regime timescales for Town & Country Planning (TCP)		Ongoing	Open
100	WG15	RM	Will timescales for submitting offers change with changes in programme timelines		Ongoing	Open
101	WG15	RM	Workgroup require timings for the further updates on Element 19		Ongoing	Open
102	WG15	MO	Swim lane document to be produced for CMP434 and 435		Ongoing	Open
105	WG16	AT/SB	Request for ESO to provide comment on how options will be created for Govt decisions on capacity mix (and the legal basis for decisions)	ESO session arranged for 16 th September “Potential to apply a technology lens to Connections Reform event”	Ongoing	Propose to close

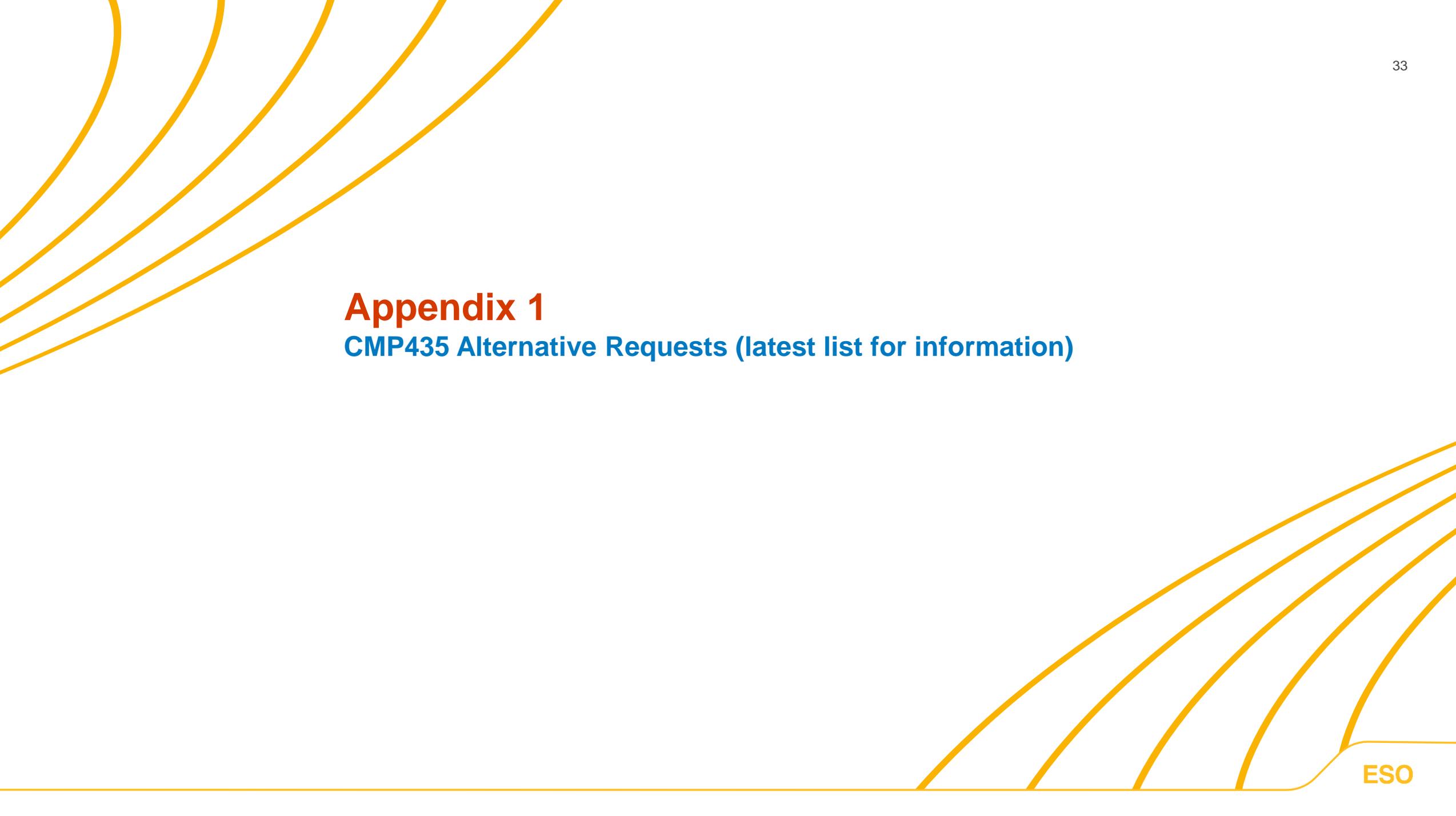
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107	WG17	AC	Clarify the process for transitional accepted offers in relation to 434 and/or 435 processes	Ongoing discussions		Open
108	WG17	AQ	Come back with a clarificatory position on application routes where GSPs are involved	TBC		Open
110	WG17	AQ	Provide the document outlining the CMP435 legal text approach for sharing with the Workgroup	Ongoing		Open
111	WG18	RM	Underlying RFI data to be supplied in Excel format as per WG17			Open
112	WG18	MO	ESO and Ofgem to discuss expectations re:ToR i) and feedback to Workgroup			Open

Any Other Business

Catia Gomes– ESO Code Administrator

Next Steps

Catia Gomes – ESO Code Administrator

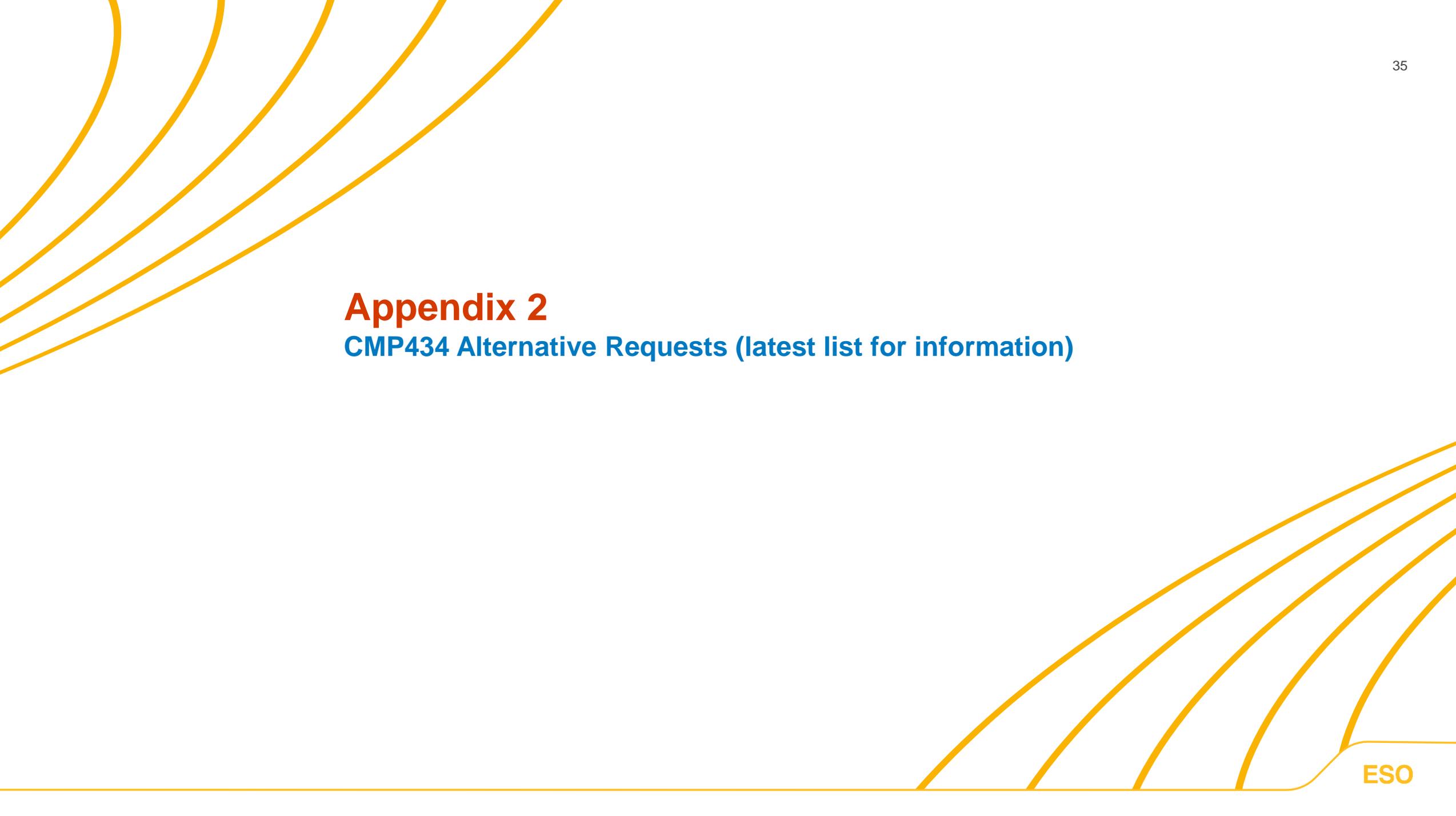


Appendix 1

CMP435 Alternative Requests (latest list for information)

Alternatives Summary – CMP435

<u>Alternative Number</u>	<u>Proposer Name</u>	<u>Proposer Organisation</u>	<u>What does this Alternative suggest? Very brief summary</u>	<u>Comment</u>
1	Jonathon Hoggarth	EDF	This Alternative proposes to implement a transition period of 6 months from the implementation period in order to allow the Gate 2 criteria to be achieved by existing contracted parties with viable projects.	Proposer to consider the feedback in Workgroup 16 for any updates
2	Ed Birkett	Low Carbon	This Alternative Request would require the ESO to implement changes to existing agreements via Agreements to Vary.	Formally withdrawn 02.09.24
3	Grant Rogers	Q-Energy Sustainable Investments Ltd	Remove Element 14 from the proposed solution to ensure focus on the project and land requirements at application stage and ensure applicants are subject to requirements at Gate 2.	To be formally withdrawn
4	Will Wason	Orron Energy	The proposal below is a fairer and more balanced approach that will ensure a reduction of TEC Queue, whilst also enabling a sensible transition period to enable roll-out of viable renewable energy projects in order to reach the UK Net Zero targets.	Not currently proceeding as a submission
5	Phillip John	Epsilon		Alternatives received for CMP434 following the critical friend check
6	Steffan Jones	ENWL	To introduce a (significant) Financial Instrument to the Gate 2 Criteria, potentially in the form of a £/MW non-refundable deposit.	ESO speaking to Steffan directly to discuss in relation to the Financial Instrument modification.
7	Garth Graham	SSE Generation	(In association with a twin CMP434 Alternative Request) Retention of pre-reform contracts/agreements for existing projects, with exemptions for i) projects with a connection/accepted offer prior to 02 Sept 2024 and a secured Government Support Contract, or ii) offshore wind projects with a connection/accepted offer prior to 02 Sept 2024 that are necessary to deliver Government plans. Acknowledgement of an Application Window and replacement of Gate 2 criteria with CMP376 QM milestones and financial commitment.	Alternative Request received 11 Sept 2024 for critical friend checks



Appendix 2

CMP434 Alternative Requests (latest list for information)

Alternatives Summary

<u>Number</u>	<u>Proposer Name</u>	<u>Proposer Organisation</u>	<u>What does this Alternative suggest?</u>	<u>Update post Workgroup 20</u>
1	Simon Lord	Engie	Firm access only available to projects that are fully formed and formally in the planning process.	Confirmation no amendments
2	Phillip Addison	EDF	This alternative proposes to remove the current proposed restrictions to build capacity outside of the red line boundary.	No update
3	Phillip Addison	EDF	The current proposed forward planning milestone are to be removed from the proposal. The current Queue Management planning milestone dates will be used instead.	Offline discussion to take place with Jade Ison (Action 47)
4	Steffan Jones/Brian Hoy	ENWL	Clarifying the definition of embedded schemes that will follow the Primary Process	No update
5	Steffan Jones/Brian Hoy	ENWL	Raising the lower threshold at which embedded schemes that will follow the Primary Process	No update
6	Steffan Jones/Brian Hoy	ENWL	To amend the threshold at which embedded schemes will follow the Primary Process	No update
7	Zachary Gray	Hydrostor Inc	To provide greater certainty to all LDES projects, requesting regulatory alignment between future connection reforms, consents, and procurements by considering further provisions for LDES beyond pumped hydro.	Withdrawn to be explored in another space outside CMP434
8	Helen Stack	CBS Energy Storage Assets UK Limited	Inclusion of wording within the proposal and subsequent CUSC legal text requiring DNOs to include all applicable Embedded Projects that provide a competent Gate 2 compliance application / submission of evidence within the Gate 2 application window as part of the DNOs fully completed Gate 2 application to the ESO. This would have to be within the codified period of time (currently 10 business days as per the "Rebaseline Proposal") following closure of the given window.	Aligned with Alternative Request 23 -Alternative 8 removing reference to a timeframe given the rebaselined ESO proposal introduces this and Alternative 23 seeks to extend Proposed combination with Alternative Request 8 proposed by Workgroup member as another choice
9	Deborah Walker	ABO Energy	Extend the timeline for implementation	Request withdrawn due to timeline update - email confirmation of official withdrawal received 29/8
10	Eibhlin Norquoy	Point and Sandwick Power Limited	To provide an indication of cost within the Gate 1 offer. Indication of costs ahead of application to Gate 2 would enable developers to undertake early planning for costs, securities, and liabilities and be in a better financial position to be able to accept a Gate 2 offer. This will be especially important for Embedded Generation which is not familiar with Transmission costs.	Minor amendments – implementation date and removes a reference to a page number To amend solution after small/med/large embedded clarification – possibly raise a further Alternative/discussion with RW/RP over illustrative charging examples

Alternatives Summary

<u>Number</u>	<u>Proposer Name</u>	<u>Proposer Organisation</u>	<u>What does this Alternative suggest?</u>	<u>Update</u>
11	Eibhlin Norquoy	Point and Sandwick Power Limited	In order to fully comply with objective (c) of CUSC, and especially alignment with articles of Regulation (EU) 2019/943 requiring “to ensure fair conditions of competition in the internal electricity market”, introduce an alternative to unfair connection regulation for Community Generators by considering a specific “Community” Project Designation. Community Generators have repeatedly been shown to deliver many times more value and return locally and have considerably more local acceptability and support when compared to embedded generation in general. The Alternative should both increase the installed capacity and value, and speed to build out of embedded Community led generation across the networks so furthering the overall aims of this reform. Furthermore, it addresses increasing fairness and inclusion challenges by recognising the additional benefits these generators bring to society through the additional operating restrictions they have in place in order to ensure benefit from their actions is socialised, the fact that speculation is effectively not a practical feature for them, and to compensate for the unbalanced conditions and lack of resources faced when Community Generators have to compete with the corporations in the new ‘first ready, first served’ approach of the connection reform.	Minor amendments made – implementation date and removes a reference to a page number Consider interaction with Alternative Request 25 when it is presented/Consider workgroup feedback
12	Eibhlin Norquoy	Point and Sandwick Power Limited	In order to fully comply with objective (c) of CUSC, and especially alignment with articles of Regulation (EU) 2019/943 requiring “to ensure fair conditions of competition in the internal electricity market”, introduce provisions so a proportion of any planned new grid infrastructure would be ring-fenced for use by Community Generators in the first instance. If community companies do not apply to use the capacity within a defined period (e.g., 5 to 7 years), the capacity can then be released back into the wider market. Community Generators have repeatedly been shown to deliver many times more value and return locally and have considerably more local acceptability and support when compared to embedded generation in general. The Alternative should both increase the installed capacity and value, and speed to build out of embedded Community led generation across the networks so furthering the overall aims of this reform. Furthermore, it addresses increasing fairness and inclusion challenges by recognising the additional benefits these generators bring to society through, the additional operating restrictions they have in place in order to ensure benefit from their actions is socialised, the fact that speculation is effectively not a practical feature for them, and to compensate for the unbalanced conditions and lack of resources faced when, Community Generators have to compete with the corporations in the new ‘first ready, first served’ approach of the connection reform.	Amendments to Alternative 12 are more to align the alternative with the latest redline version given that Gate 1 is no longer mandatory.
13	Ed Birkett	Low Carbon	This proposed alternative would codify a simple capacity reallocation mechanism, with terminated capacity being offered to the next project that has passed Gate 2 and can take advantage of that terminated capacity.	Revised this following WG feedback to provide clarification on the impact on Elements 9 and 10. Consider if this is in scope of CMP434

<u>Number</u>	<u>Proposer</u>	<u>Proposer Organisation</u>	<u>What does this Alternative suggest?</u>	<u>Update</u>
14	Ed Birkett	Low Carbon	This Alternative Request would codify the proposed restrictions on changes to project RLB post-Gate 2. The original solution does not propose to codify these new restrictions, instead proposing to house the restrictions in the proposed Gate 2 Criteria Methodology.	Review dependent on the draft Legal Text.
15	Grant Rogers	Q-Energy Sustainable Investments Ltd	Remove DFTC from the proposed solution. DFTC is proposed as a forecast however existing DNO datasets already indicate this in the same way DFTC is intended to e.g. connections application data and the ECR's confirm the relevant generation applicants and the upstream GSP's at DNO level.	Removal? Was to remain until full solution evident
16	Grant Rogers	Q-Energy Sustainable Investments Ltd	Remove Element 14 from the proposed solution. This would limit/stop the ability to move site location post Gate 2 Offer.	Removal? Was to remain until full solution evident
17	Grant Rogers	Q-Energy Sustainable Investments Ltd	Alternative to Element 18. A new process, preferably codified, to address how DNOs and transmission connected iDNOs notify the ESO of Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations which meet Gate 2 criteria	No update
18	Luke Scott	Northern PowerGrid	We would like the existing Allowable change rules to remain in place, and for us not to adopt the proposed significant change element.	Request considered to be withdrawn – still awaiting official confirmation.
19	Joe Colebrook	Innova Renewables	Remove Element 9: Project Designation from the Original proposal.	Confirmed no amendments required.
20	Philip John	Epsilon Generation Limited	Planning submission or permission is required as part of Gate 2 criteria	Currently being reconsidered
21	Philip John	Epsilon Generation Limited	Reintroduction of Element 14 and to remove the current proposed restrictions to build capacity outside of the red line boundary.	Currently being reconsidered
22	Claire Hynes	RWE	For Users to provide the date they expect to submit planning consent to the ESO post Gate 2 when the outcome of Transmission Owner (TO) site studies is known and a point of connection is provided.	Proposer to review request and consider Workgroup feedback
23	Laura Henry/ Jack Purchase	NGED	To change the proposal in Element 12 for the time that DNOs and IDNOs have to submit the evidence to demonstrate that projects connecting to their networks have met the Gate 2 criteria (and also the full technical data submission required for a project progression), from 10 working days to 20 working days	Proposed combination with Alternative Request 8 proposed by Workgroup/possibility of providing analysis/ AP to consult with LH in terms of flex/ consider other ways to mitigate this issue (RPW)
24	Phillip John	Epsilon	Introduction of Planning Consent within the Gate 2 Criteria Process	New Alternative Request submitted – currently being reconsidered along with 20 and 21
25	Claire Hynes	RWE	Obligation to Codify the Methodologies and Guidance Documents under Connection Reform	New Request submitted 30/8 Consider if this is in scope of CMP434
26	Garth Graham	SSE	To create a single process that will apply to new and existing projects. It seeks to filter projects based on (i) Gate 1 - system need (i.e., alignment with UK Government-backed plans); and Gate 2 - project commitment, plus recognition that, by securing grid connection, other project developers forgo the opportunity to connect their projects. Projects are then subject to the full suite of existing Queue Management Milestones to ensure they progress.	New Alternative Request submitted 12.9.24

Raising an Alternative Request Information

What is the Alternative Request?

What is an Alternative Request? The formal starting point for a Workgroup Alternative Modification to be developed which can be raised up until the Workgroup Vote.

Who can raise an Alternative Request? Any CUSC Party, BSC Party, the Citizens Advice or the Citizens Advice Scotland may (subject to Paragraph 8.20.20) raise a Workgroup Consultation Alternative Request in response to the Workgroup Consultation. If you are not a CUSC Party, but are nominated by a CUSC Schedule 1 Party, please submit a statement in writing from the nominating party to confirm submission of the Alternative Request on their behalf. No Workgroup Consultation Alternative Request may be raised by any CUSC Party during any second or subsequent Workgroup Consultation.

What do I need to include in my Alternative Request form? The requirements are the same for a Modification Proposal you need to articulate in writing:

- a description (in reasonable but not excessive detail) of the issue or defect as outlined in the Original Proposal which the alternative seeks to address compared to the current proposed solution(s);
- the reasons why you believe that the proposed alternative request would better facilitate the Applicable Objectives compared with the current proposed solution(s) together with background information;
- where possible, an indication of those parts of the Code which would need amending in order to give effect to (and/or would otherwise be affected by) the proposed alternative request and an indication of the impacts of those amendments or effects; and
- where possible, an indication of the impact of the proposed alternative request on relevant computer systems and processes.

How do Alternative Requests become formal Workgroup Alternative Modifications? The Workgroup will carry out a Vote on Alternatives Requests. If the majority of the Workgroup members or the Workgroup Chair believe the Alternative Request will better facilitate the Applicable Objectives than the current proposed solution(s), the Workgroup will develop it as a Workgroup Alternative Modification.

Who develops the legal text for Workgroup Alternative Modifications? ESO will assist Proposers and Workgroups with the production of draft legal text once a clear solution has been developed to support discussion and understanding of the Workgroup Alternative Modifications.

Voting Information

What is the Alternative Vote?

To participate in any votes, Workgroup members need to have attended at least 50% of meetings. The vote shall be decided by simple majority of those present at the meeting at which the vote takes place (whether in person or by teleconference)

Stage 1 – Alternative Vote

- Vote on whether Workgroup Alternative Requests should become Workgroup Alternative CUSC/ STC Modifications.
- The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.
- **Should the majority of the Workgroup OR the Chair believe that the potential alternative solution may better facilitate the CUSC/ STC objectives than the Original then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative CUSC modification (WACM)/ STC modification (WASTM) and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.**

What is the Workgroup Vote?

To participate in any votes, Workgroup members need to have attended at least 50% of meetings. The vote shall be decided by simple majority of those present at the meeting at which the vote takes place (whether in person or by teleconference)

Stage 2 – Workgroup Vote

- 2a) Assess the original and Workgroup Alternative (if there are any) against the relevant Applicable Objectives compared to the baseline (the current code)
- 2b) Vote on which of the options is best.

Alternate Requests cannot be raised after the Stage 2 – Workgroup Vote

Voting Eligibility (prior to WG17)

CMP435 - Application of Gate 2 Criteria to existing contracted background Workgroup Membership

Code Administrator Modification Chair: Elana Byrne
Code Administrator Technical Secretary: Tammy Meek

[Code Modification Page](#)
[Code Governance Rules](#)

All Workgroup members are eligible to vote if they (or a declared alternate) have attended 50%+ of meetings to date.

Red = not currently eligible.

Role	Name	Company	Industry Sector	Eligibility to Vote
Proposer	Alice Taylor	ESO	System Operator	100%
Workgroup Member	Andy Dekany	NGV	Interconnector	94%
Workgroup Member	Antony Cotton	Energy Technical & Renewable Services Ltd	Other - not disclosed	100%
Workgroup Member	Barney Cowin	Statkraft	Generator	88%
Workgroup Member	Callum Dell	Invenergy	Generator	50%
Workgroup Member	Charles Deacon	Eclipse Power Solutions	Network Operator	68.75
Workgroup Member	Charles Edward Cresswell	Cero Generation	Generator	7%
Workgroup Member	Claire Hynes	RWE Renewables	Generator	94%
Workgroup Member	Deborah MacPherson	Scottish Power Renewables	Generator	88%
Workgroup Member	Ed Birkett	Low Carbon	Generator	100%
Workgroup Member	Gareth Williams	Scottish Power Transmission	Onshore Transmission Licensee	100%
Workgroup Member	Garth Graham	SSE Generation	Generator	100%
Workgroup Member	Grant Rogers	Qualitas Energy	Generator	63%
Workgroup Member	Greg Stevenson	SSEN Transmission (SHET)	Onshore Transmission Licensee	100%
Workgroup Member	Helen Snodin	Fred Olsen Seawind	Generator	82%
Workgroup Member	Hooman Andami	Elmya Energy	Generator	69%
Workgroup Member	Jack Purchase	NGED	Network Operator	82%

CMP435 - Application of Gate 2 Criteria to existing contracted background Workgroup Membership

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All Workgroup members are eligible to vote if they (or a declared alternate) have attended 50%+ of meetings to date.

Red = not currently eligible.

Role	Name	Company	Industry Sector	Eligibility to Vote
Workgroup Member	Joe Colebrook	Innova Renewables	Generator	69%
Workgroup Member	Jonathan Wood	Tarchon Energy	Interconnector	14%
Workgroup Member	Jonathon Lee Hoggarth	EDF Renewables Ltd	Generator	88%
Workgroup Member	Kyran Hanks	WWA Ltd	CUSC Panel Member	75%
Authority Representative	Liam Cullen / Salvatore Zingale	Ofgem	-	N/A
Workgroup Member	Mark Field	Sembcorp Energy (UK) Limited	Legal, Regulation and Compliance	88%
Workgroup Member	Michelle MacDonald Sandison	SSEN	Network Operator	82%
Workgroup Member	Niall Stuart	Hutcheson Associates (Nominated on behalf of Buchan Offshore Wind)	Consultancy	94%
Workgroup Member	Nirmalya Biswas	Northern Powergrid	Network Operator	100%
Workgroup Member	Paul Jones	Uniper	Generator	100%
Workgroup Member	Paul Youngman	Drax	Generation/Supply	100%
Workgroup Member	Pedro Javier Rodriguez	Lightsourcebp	Generator	88%
Workgroup Member	Philip John	Epsilon Generation	Generator	19%
Workgroup Member	Phillip Robinson	ITPEnergised	Other – not disclosed	25%
Workgroup Member	Ravinder Shan	FRV TH Powertek Limited	Generator	94%
Workgroup Member	Richard Woodward	NGET	Onshore Transmission Licensee	94%
Workgroup Member	Rob Smith	Enso Energy	Generator	94%

CMP435 - Application of Gate 2 Criteria to existing contracted background Workgroup Membership

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All Workgroup members are eligible to vote if they (or a declared alternate) have attended 50%+ of meetings to date.

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Red = not currently eligible.

Role	Name	Company	Industry Sector	Eligibility to Vote
Workgroup Member	Ross Thompson	UK Power Networks	Network Operator	94%
Workgroup Member	Sam Aitchison	Island Green Power	Developer	69%
Workgroup Member	Samuel Railton	Centrica	Generator	94%
Workgroup Member	Steffan Jones	Electricity North West Limited (ENWL)	Network Operator	94%
Workgroup Member	Wendy Mantle	Scottish Power Energy Networks	Network Operator	94%

Regarding STC – no alternatives have been raised for CM096. Should an alternative be raised, voting eligibility will be calculated.
Currently all Workgroup Members for STC have voting eligibility.