

# Code Administrator Meeting Summary

## Meeting name: CMP434 & CM095 Workgroup 22

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Date: 11/09/2024

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### Contact Details

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

Proposer: **Ruby Pelling** [ruby.pelling@nationalgrideso.com](mailto:ruby.pelling@nationalgrideso.com)

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## Key areas of discussion

The key areas in Workgroup 22 were to review Alternative Requests, the Action Log, and the Terms of Reference. The Chair noted quoracy and began the Workgroup.

### Timeline update

The Chair shared the updated timeline, noting that the Key Objectives of meetings were subject to change. A Workgroup member asked how the delay to the timeline would be announced, another Workgroup member stated that the public would be informed via a letter from OFGEM.

Discussions were had on how Workgroup Alternative Requests should be handled going forward, and various suggestions were given on ways to make the process more efficient.

### RFIs

An SME gave a high-level review of answers that prospective Distribution and Transmission connections gave on if they would be able to meet Gate 2.

A Workgroup member asked how hybrid sites are represented in this data, the SME stated that they would only show up as one technology. A Workgroup member asked what the criteria for land ownership was in these questions, the SME stated that it was only a statement and did not have to be proved. A Workgroup member asked if this data could be broken down regionally, the SME answered no. Workgroup members were generally pleased with the RFI data but noted that they would have liked a more granular breakdown.

### Alternative request review

Alternative 22 was focused on making applicants provide a date where they would be required to submit planning consent. A Workgroup member stated that this idea had already been covered in the Workgroup Consultation on page 45 paragraph C. A Workgroup member asked if this alternative seeks to create an obligation to provide data or create a new milestone, the proposer stated that it only seeks to provide information. A Workgroup member stated they don't feel like Alternative 22 should be in the code and would be better served being an added bonus that applicants can provide.

Alternative request 7 has been withdrawn by its Proposer.

Alternative requests 8 and 23 were focused on the obligation for how soon DNOs have to submit embedded applications, with the current time being 10 business days. These Alternatives were not

merged despite being similar due to Alternative 8 being focused on the wording of the legal text and Alternative 23 being focused on altering the number of days from 10 to another number. A Workgroup member noted that the CUSC may not be the right area to implement this idea as the concern from the proposers is mostly focused on Embedded Generation, which is a Distributed issue. A Workgroup member stated they believed this proposal aligned closely with what the ESO has proposed. A DNO Workgroup member stated they felt 10 days would not be enough time, and 20 days was closer to the correct number.

Alternative request 13 is focused on stopping the ESO from being able to use project designation on the capacity that has been removed from the queue. The proposer would like the capacity to go to the next project in the queue rather than allowing the ESO to reallocate the capacity to projects further back in the queue. A Workgroup member asked if this alternative was within scope, to which the Alternative proposer stated that if this was not within scope, then having such prominent methodologies would also be out of scope. A Workgroup member asked how terminated capacity is reallocated currently, the ESO agreed to answer this question at a later date.

Alternative request 10 is about including a cost indication in the Gate 1 offer. The ESO Proposer stated that small and medium generators are not able to go through Gate 1, as only large generators are able to. The Proposer of this modification suggested they may propose an alternative to allow small and medium power stations to go through Gate 1. A Transmission SME stated there may already exist an indicative cost for this situation and agreed to talk this proposer through the process.

Alternative request 11 is on allowing community generation to be part of project designation, as community generation often takes longer to progress when compared to projects by larger developers. The intention of the proposer of this Alternative is that the ESO could then use this power to allow more community projects to exist. A Workgroup member noted that community generators may not always come under the CUSC as they could be connecting to a Distribution network. A Workgroup member stated that the proposer of the Alternative could seek out derogation rather than a CUSC change. A Workgroup member asked the ESO how many projects have got existing Transmission capacity or are in the existing contracted background and are seeking transmission connections. The Proposer of this Alternative stated there was 398 MW of community generation connected to the system, which was mostly Distribution connected.

Alternative request 12 is about extending Element 10, Capacity Reservation, to ringfence a percentage of new grid infrastructure for community generation. The changes made to this Alternative were to remove the references to Gate 1 and 2, and to include a time where this reserved capacity is released to the general pool.

**CMP434 Terms of Reference**

The Proposer presented the terms of reference, with the intent of placing it on a RAG status. Subjects are marked according to the following criteria:

<b>RAG Status</b>
ToR Completed
Discussions ongoing but on track to meet ToR by Workgroup Report
Not on track to meet ToR by Workgroup Report

a) Consider the implementation and transitional arrangements.

b) Review and support the legal text drafting: The Workgroup debated that the status should be either red or amber.

## ESO

- c) Consider the cross Code impacts this modification has, in particular the STC and distribution arrangements (e.g. DCUSA).
- d) Consider any potential licence changes which may be required, liaising with the Authority as required to discuss them.
- e) Consider the scope of application for the proposed solution by technology/project type including changes to existing connected Users and any acceptable criteria for any exclusions or alternative approaches which may be needed.
- f) Consider the interactions between the proposed solution(s) and distribution connection processes: There was significant debate on whether this point should be red or amber.
- g) Consider the accessibility and transparency of new processes for Users as much as possible, particularly new entrants.
- h) Briefly consider any future policy development which may be beneficial to enhance the proposed 'minimum viable product' solutions: no longer included
- i) Consider Electricity Balancing Regulation implications.
- j) Consider mechanisms to ensure projects progress from Gate 1 to Gate 2 including financial instruments.
- k) Consider the impact of NESO designation of Gate 2 status, and ways to make this non-discriminatory.
- l) Consider how the solution(s) conforms with the statutory rights with respect to terms and conditions for connection
- m) Consider the relevant content of Annex B of the Open letter on connections reform publication.

### **CM095 Terms of Reference**

The Proposer of CM095 went through the terms of reference to place them on a RAG status, as can be seen in the accompanying papers. The Workgroup had no comments on a-l.

### **Actions**

Action 62 was closed. Workgroup members asked for an ESO SME to explain the new proposed BEGA/BELLA process, which the ESO SME did.

Actions 63/64 were closed as a Pictorial timeline of an Indicative BEGA/BELLA Gate 2 Offer was provided.

### **Next steps**

Actions to be circulated to Workgroup members.

### **Actions**

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
11	WG2	All	Add agenda time to respond to papers provided by Workgroup members	Ongoing	WG4	Open

20	WG6	JN/AQ	Consider legal perspective on NESO designation	To remain open until legal text review 17/9	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
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)	To remain open until legal text review 17/9	TBC	Open
31	WG9	MO	More detail requested by Workgroup to make a judgement on Connection Point and Capacity Reservation (including offshore)	To remain open until legal text review 17/9	TBC	Open
35	WG10	AC/AQ	ESO to confirm whether additional uncertainty clauses (which have been appearing in offers recently) will remain		TBC	Open
38	WG11	MO	Updated Action: To expand on licence change conditions/obligations, including any suggested changes to the Licensed offer timescales	ESO not drafting licence text suggestions	TBC	Open
40	WG11	RF	To share licence changes programme timescales with Workgroup		TBC	Open
41	WG12	PM	To share analysis/feedback which informs the Gate 2 period offer acceptance to submission of application for Planning Consent		TBC	Open
43	WG16	DH/GL	Investigate whether changes are required to STCP 18-7 based on the CMP434 solution	Need to confirm as the CMP434 solution is now finalised.	ASAP	Open
49	WG17	MO	Updated action: SMEs to share a short summary of the methodologies and the underlying principles of this modification. This should include a plan for development of methodologies, including timescales and engagement with stakeholders.	Ongoing discussion with Ofgem	TBC	Open

50	WG18	AQ	Provide the ESO view on the legal position associated with Element 1 of the Proposal in the context of the Ofgem decision-making process on code change		TBC	Open
51	WG18	HM	Provide further explanation/evidence on the perceived flexibility / timing differences between changing the content of a methodology and changing the content of a code.		TBC	Open
53	WG18	DD/SG	Clarify whether developer requested changes within a Significant Modification Application could potentially be so significant that they result in an application having to be restarted or having the contract terminated, etc	Some requests could be so significant that, if accepted, the project would not retain their contracted 'queue' position	TBC	Closed
55	WG18	DD	Re-review consultation feedback specific to the ESO position on any Non-GB Projects (as consulted on within the WG Consultation) and either confirm that the position still remains unchanged or confirm new position to the Workgroup.	Ongoing	TBC	Open
56	WG18	MO	Confirmation of whether financial instruments will be raised as a separate modification.	Yet to be confirmed	TBC	Open
57	WG18	AQ	Consider Innova response and confirm whether ESO feels that Element 9 is consistent with Electricity Regulations in terms of discrimination.		TBC	Open
58	WG18	PM	Clarify whether anything in Proposal could allow the Gate 2 criteria to be amended and applied retrospectively i.e. with a Gate 2 project then no		TBC	Open

			longer being a Gate 2 project, even where it is complying with its ongoing compliance obligations.			
59	WG19	PM	Element 11 – Produce examples to provide clarification to the Workgroup (slide 25) on how using installed capacity could work in practice	No update	TBC	Open
60	WG19	PM	Element 11 – Consider Workgroup Member request to provide analysis to show which projects could benefit from the Proposals (slide 26) to have a milestone adjustment ability for ESO e.g. where a developer asks for an earlier date and gets a later date, or asks for and gets a later date (but this is due to a normal programme timescales e.g. mega projects) to avoid unintended outcomes.	No Update	TBC	Open
61	WG19	RPa/MO	Element 17 - To confirm BEGA application information i.e. in relation to what happens where a relevant small or medium EG project gets a different GSP to what they expected (as a result of the Gate 2 process and via the DNO) (Garths question)		TBC	Open
62	WG19	RPa	Element 17 – To provide a pictorial representation of BEGA/BELLA process as proposed	Update to be provided in WG22	TBC	Closed
63	WG19	Rpa	Element 17 – Create an additional swimlane/s for chevron diagram for BEGA/BELA	Update to be provided in WG22	TBC	Closed
64	WG20	Rpa	Element 17 - To produce prescribed timelines/timescales (Garths request as per slide 13) for both small and large	Update to be provided in WG22	TBC	Closed

66	WG19	MO	More information on timeline on CP30 plans/impacts to be shared once they are available (to compare to the code change programme, including voting timetable).		TBC	Open
67	WG20	PA/JI	Offline discussion regarding Alternative Request 3 proposal		TBC	Open
68	WG20	MO	Consider workshops to allow discussion time for forward looking milestones and expectations for planning		TBC	Open
71	WG21	AP	ESO to confirm whether in practice new GSPs (related to DNOs or Transmission connected iDNOs) will ever not have relevant EG associated with them in future	How the process would work for a GSP which has Demand and Generation in the mix.	TBC	New
72	WG21	TE/CH	Amend Alternative Request Proposal 22 and feedback to Workgroup		TBC	New
73	WG21	LH	Provide analysis/evidence of the impact of Alternative Request 23 (NGED) and consider Alternative ways of solving the issue e.g. more windows (PY comment)		TBC	New
74	WG21	LH/HS	Proposers of Alternative Requests 8 and 23 to liaise and consult on whether proposals may be merged		TBC	New
75	WG21	AQ/LH	RE – Alternative Request 23 - To consult legal teams as to whether a 10- or 20-day obligation is most appropriate within the CUCS or in the licence		TBC	New
76	WG21	MO	Provide Workgroup feedback to the ESO Policy and Change team on the absence of wider industry consultation on the Technology Change Guidance Paper		TBC	New

**Attendees**

<b>Name</b>	<b>Initial</b>	<b>Company</b>	<b>Role</b>
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
Ruby Pelling	RP	ESO	Proposer
Rory Fulton	RF	Ofgem	Authority Representative
Alison Price	AP	ESO	SME
Michael Oxenham	MO	ESO	SME
Paul Mullen	PM	ESO	SME
Alex Ikonic	AI	Orsted	Workgroup Member
Allan Love	AL	SPT	Workgroup Member
Andy Dekany	AD	NGV	Workgroup Member
Anthony Cotton	AC	Green Generation Energy Networks Cymru Ltd	Workgroup Member
Bill Scott	BS	Eclipse Power Networks	Workgroup Member
Brian Hoy	BH	Electricity North West Limited (ENWL)	Workgroup Member
Ciaran Fitzgerald	CF	Scottish Power Renewables	Workgroup Member
Claire Hynes	CH	RWE Renewables	Workgroup Member
Claire Witty	CW	Scottish Power Energy Networks	Workgroup Member
Donald Fu	DF	NatPower Marine	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
Jack Purchase	JP	NGED	Workgroup Member
Joe Colebrook	JC	Innova Renewables	Workgroup Member



Kimbrah Hiorns	KH	EDF Renewables	Workgroup Member
Kyran Hanks	KYH	CUSC Panel member	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	PY	Drax	Workgroup Member
Ravinder Shan	RS	FRV TH Powertek Limited	Workgroup Member
Richard Woodward	RW	NGET	Workgroup Member
Rob Smith	ROS	Enso Energy	Workgroup Member
Sam Aitchison	SA	Island Green Power	Workgroup Member
Zachary Gray	ZG	Hydrostor	Presenter / Observer
Zivanayi Musanhi	ZM	UK Power Networks	Workgroup Member
Zygimantas Rimkus	ZR	Buchan Offshore Wind	Workgroup Member