

Workgroup Consultation Response Proforma

CM095: Implementing Connections Reform

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 stcteam@nationalgrideso.com by **5pm on 06 August 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 stcteam@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Paul Youngman	
Company name:	Drax	
Email address:	paul.youngman@Drax.com	
Phone number:	07738 802266	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input checked="" type="checkbox"/> Storage <input checked="" 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 Workgroup, Panel or the industry for further consideration)

For reference the Applicable STC Objectives are:

- efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act
- development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission
- facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity
- protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees

- e) *promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.*
- f) *facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
- g) *compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.*

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the Original solution better facilitates: Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <input type="checkbox"/> F <input type="checkbox"/> G
We are supportive of the proposal to the extent that component A reflects the changes needed as a result of the CMP434 proposal. However, there is insufficient detail as to obligations and timings of parts of the process to consider the impact on the Applicable Objectives. Also, no evidence has been provided of the benefits of the changes to the Applicable Objectives. For instance, we would expect the proposer to provide evidence that Connection Point and Capacity Reservation provisions would not negatively impact Applicable Objective (C) <i>facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity</i>		
2	Do you support the proposed implementation approach? (see page 12)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
It is right that the necessary STC changes are implemented if CMP434 is approved.		
3	Do you have any other comments?	
No comment.		
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/> No
At present, we do not wish to raise an Alternative Request		

Specific Workgroup Consultation questions	
5	Do you agree with the components of the proposed solution? Please provide rationale for your answer and any suggestions for improvement to each component.

Component A: Proposed Reformed Connections Process and Timescales, including ESO/TO obligations (see pages 5-6)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The proposal details the potential steps and handover points of the process but does not apply any timescales. We believe that the proposer should provide an assessment of minimum standard obligations that the TO and ESO should deliver to each other and to customers. From a developer perspective, there should be consistency with the current provisions so that the time for offers is minimised.	
Component B: Connections Network Design Methodology (see pages 6, 8-9)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
No detail has been shared on the CNDM by the proposer, although it appears central to the intent of the modifications in setting out the 'capacity reallocation mechanism.' We do not support this methodology being outside of code governance. If there is to be a CNDM, its obligations including those applying to the ESO should be codified.	
Component C: Connection Point and Capacity Reservation (see pages 6-10)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
We cannot support this currently as no evidence has been provided as to the benefits or the potential impacts on other parties of sterilising this TEC at Gate 1. It has also been mooted that this would not be limited to parties that were within an HND as has previously applied. We do not believe it is necessary for this element to be part of the minimum viable product. Without sufficient evidence and assessment of this component, we are unable to state whether this satisfies any of the Applicable STC Objectives.	
6 Do you agree that the Proposer has fully identified the high-level impacts (subject to legal text drafting) on the STC and STCPs as a result of the CMP434 Proposal? If you do not agree, what else do you think is impacted and/or needs to change? (see page 3)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	<p>As highlighted in response to previous questions, insufficient detail has been provided on the process, obligations and timings to assess the impacts. There is also an absence of any monitoring of how each party is discharging its obligations. There are also no transparency obligations on the parties to report on how effective the process (or parts thereof) are.</p>	
7	<p>In your consideration of the CM095 proposal, are there any potential risks for implementation which might also impact the CMP434 or CMP435/CM096 proposals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>In our responses to the related modification proposals, we've highlighted the interdependency between the modifications, and that they are all dependent on methodologies that are proposed to be outside of code governance and subject to changes to both TO and ESO licences. We believe these interdependencies create considerable risk for implementation, and not codifying the methodologies creates considerable risk to achieving the desired outcomes.</p>		