

Public

CMP434 & CM095 Workgroup 33 Meeting Summary

CM434 & CM095 Workgroup Meeting 33

Date: 30/10/2024 **Location:** Teams
Start: 10:00 AM **End:** 2:50 PM

Participants

Name	Initial	Company	Role
Claire Goult	CG	Code Administrator, NESO	Chair
Lizzie Timmins	LT	Code Administrator, NESO	Chair
Prisca Evans	PE	Code Administrator, NESO	Tech Sec
Graham Lear	GL	NESO	Proposer
Ruby Pelling	RP	NESO	Proposer
Alison Price	AP	NESO	SME
Angela Quinn	AQ	NESO	SME
Paul Mullen	PM	NESO	SME
Mike Oxenham	MO	NESO	SME
Rory Fulton	RF	Ofgem	Authority
Salvatore Zingale	SZ	OFGEM	Authority
Adanna Ugo-okoye	AU	Statkraft	Workgroup Member
Allan Love	AL	Scottish Power Transmission	Workgroup Member
Anthony Cotton	AC	Green Generation Energy Networks Cymru Ltd	Workgroup Member
Andy Colley	AC	SSE Generation	Workgroup Member
Andy Dekany	AD	NGV	Workgroup Member
Brian Hoy	BH	Electricity Northwest Limited (ENWL)	Workgroup Member
Charles Deacon	CD	Eclipse Power Network	Workgroup Member
Charles Yates	CY	Fred Olsen Seawind	Workgroup Member
Ciaran Fitzgerald	CF	Scottish Power Renewables	Workgroup Member

Public

Claire Hynes	CH	RWE Renewables	Workgroup Member
Claire Witty	CW	Scottish Power Energy Networks	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	HS	Centrica	Workgroup Member
Jack Purchase	JP	NGED	Workgroup Member
Joe Colebrook	JC	Innova Renewables	Workgroup Member
Jonathan Whitaker	JW	SSEN Transmission	Workgroup Member
Mark Field	MF	Sembcorp Energy (UK) Limited	Workgroup Member
Mohamed Bilal	MB	UK Power Networks	Workgroup Member
Paul Jones	PJ	Uniper	Workgroup Member
Phillip Addison	PA	EDF Renewables	Workgroup Member
Ravinder Shan	RS	FRV TH Powertek Limited	Workgroup Member
Richard Woodward	RW	NGET	Workgroup Member
Ross O'Hare	RO	SSEN	Workgroup Member
Rob Smith	RS	Enso Energy	Workgroup Member
Sam Aitchson	SA	Island Green Power	Workgroup Member
Zivanayi Musanhi	ZN	UK Power Networks	Workgroup Member
Zygimantas Rimkus	ZR	Buchan Offshore Wind	Workgroup Member

Key Objectives for this Meeting

The key objectives for this Workgroup were to finalise the CMP434 Legal Text, WACM Legal Text, CM095 Legal Text, WACM Legal Text, finalising the Workgroup report, Terms of Reference and then the Alternative Vote.

Discussion and details

WACM6 Legal Text Options

- The Chair decided to start with WACM 6 as there were 2 Alternative requests and one of them depended on WACM 6.

Public

- **17.15.3:** The Workgroup discussed whether NESO should be required to raise a code change or send to the CUSC Panel who can send it to a standing group for review and updates.
- The Workgroup Members agreed with option 2 (sending to a standing group)
- A Workgroup Member inquired about the STC equivalent of a “standing group” that could be used for reviews.
- Another Workgroup Member explained that this had become inactive and the STC Panel should be used on CM095 rather than a standing group.
- The Proposer of this WACM suggested updating the Workgroup Report to reflect the decision on option 2, as the current proposal favours option 1 and adjustments are needed to align the report with the Workgroups decision.

WACM1 Legal Text

- The Proposer of this WACM discussed defining embedded power stations by size, system impact and whether they have a BEGA to determine which parties need to follow specific processes. New categories, “category one and “category two” were introduced to make references easier in Sections 6 and 17. The Proposer also highlighted the one – megawatt threshold in Appendix G, which helps identify relevant stations.
- A Workgroup Member suggested clarifying which embedded projects need to go through the process, based on their potential system impact. He suggested that the one-megawatt threshold could be a practical measure to determine which projects are handled by the DNO and which ones go through NESO.
- The Proposer agreed and offered to simplify the definitions by removing conditional language about system impact and make it clear which projects fall under specific requirements based on size thresholds.
- A Workgroup Member expressed concern that the lower threshold of 200 kilowatts is potentially misleading, suggesting that it is not a strict rule and might require an exception to curb potential policy misinterpretation.
- The Proposer noted potential issues with the definition of embedded power stations, particularly where it includes references to a BEGA, and suggests adjusting the definition of category one to include people with a BEGA rather than separating them.
- The Workgroup agreed that the definitions and policy language need to be straightforward to ensure clarity and ease in implementation.

WACM2 Legal Text

Public
Section 6

- The Proposer explained the intent behind Section 6 Legal Text, noting that the section was designed to ensure that users apply for an evaluation of Transmission Impact early in the process.
- The Workgroup agreed with this section.

Public
Section 17

- A Workgroup Member raised concerns on this section relating to the clarity around the DNO 's responsibility in conducting transmission readiness checks, noting that the current wording may give the DNO's too much flexibility to allow delays in the checks due to resource constraints. A Workgroup member raised concerns on clarifying the time scales in the legal text as it may lead to inconsistent application as it lacks a specific timeframe.
- A Workgroup member raised concerns on the timing of fee payments in relation to project progression. Specifically, to ensure customers understand the timing and obligations for fee payments.
- A Workgroup member raised concerns on the obligation on the DNO's to submit applications without receiving payment.
- A Workgroup Member suggested clarity in Legal Text. Specifically, section, **17.6.5** requirements around fees and application procedures.

WACM3 Legal Text

- The Chair presented the legal text for comments. The Workgroup agreed with the amendments.

WACM4 Legal Text

- The Chair presented the changes made to this for comments.
- The Workgroup discussed and agreed the WACM4 legal text. One Workgroup member queried the link to clause 7 of the Construction Agreement but it was clarified that it refers to the mechanism by which reduction in capacity flows through to parties who are not compliant.

WACM 5 Legal Text

- The Workgroup discussed and agreed the WACM5 legal text.

WACM7

- The Workgroup agreed to update the Legal Text to align it to CMP435 WACM1.

Public

Alternative Requests

- The Proposer of Alternative Request 30 withdrew their Alternative Request as a result of an update to the Original legal text.
- The Chair confirmed with the Workgroup that they understood the intent of all three Alternatives (29, 31 and 32) and that they were ready to vote on them.
- None of the three Alternative Requests were voted in as WACMs by a majority of the Workgroup. The Chair noted they would not be putting any through as WACMs, sharing the reasoning behind this with the Workgroup.

CM095

Section D

- The Proposer noted there were not many changes to the STC and suggested going through the comments to resolve any remaining issues.
- The Proposer addressed a comment in relation to CNDM, noting that there was a general view to make it more visible in the Legal Text and that would be done subsequently.
- A Workgroup member highlighted the need to align the STC Legal Text with the CUSC for consistency.
- The Workgroup discussed a five-business day timeline after the application date for processing with additional adjustments to the Legal Text to address offshore projects, ensuring both offshore and onshore projects follow a clear timeline.
- The Workgroup established specific deadlines for application processing allowing companies eleven business days to finalise submissions and five months to respond to final offers.
- The Chair asked if there were any opposing views or comments, and none were raised.

Action Log

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
35	WG10	AC/AQ	ESO to confirm whether additional uncertainty clauses (which have been appearing in offers recently) will remain		TBC	Open

Public

59	WG19	PM	Element 11 – Produce examples to provide clarification to the Workgroup (slide 25) on how using installed capacity could work in practice	To be added to the QM guidance (as relates to ongoing land compliance requirement) – follow up required to decide if ‘installed capacity’ is the correct term	TBC	Open
84	WG30	AP/BH	WACM1 – Brian H and Alison P to liaise and discuss the lower limit TIA and what the CUSC stated		TBC	Open
85	WG30	GR	WACM2 – Grant Rogers has data from previous WACM where this may be useful and will speak to Helen about this re wording.		TBC	Open
87	WG30	BH/AQ	Brian and Angie to liaise directly on the legal text drafting for WACM1. Consider CUSC 6.5/Appendix G Schedule 2 and other locations where the criteria may be different		TBC	Open
88	WG31	CG/Chair	To place the methodologies when published on the collaboration space for members but also to circulate to the wider distribution list for CMP434/CM095 with an agreement not to share	Methodologies shared to WG members 28/10/24 and are on the collaborative space	TBC	Closed

Public

beyond the workgroup membership

89	WG31	MO/GL	Review impact of CMP434 WACMs and whether any ASMs are required	All CMP434 WACMs have been reviewed; STC Alternative 1 has been raised to mirror CMP434 WACM6, which was voted in as WASTM1. Other WACMs were deemed to not have a direct STC impact, however WACM5 and WACM7 may require a consequential STCP modification.	TBC	Closed
90	WG32	WKW/AP	Consider providing an embedded generation process diagram to reflect legal text		TBC	Open

Next Steps

- Circulate updated Workgroup Report to Workgroup Members.
- Circulate WACM 1 Legal Text