

Workgroup Consultation Response Proforma

CMP435: Application of Gate 2 Criteria to existing contracted background

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 cusc.team@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 cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Mark Harding	
Company name:	Enviromena Project Management UK Limited	
Email address:	mharding@enviromena.com	
Phone number:	07393 149586	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input 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 CUSC (non-charging) Objectives are:

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;*
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*

d) *Promoting efficiency in the implementation and administration of the CUSC arrangements.*

*The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.

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 checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D Click or tap here to enter text.
2	Do you support the proposed implementation approach? (See page- 57-58)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
3	Do you have any other comments? It is positive to see changes proposed to facilitate earlier connections for projects which have long term land rights and a route to planning in place. As a business, Enviromena have demonstrated a commitment to progressing projects swiftly through the development and construction stages. We are very much supporters of the 'first ready first connected' approach and you will note that we recently had the first accelerated project in the UK connected at Horsey Levels in Somerset via the Technical Limits Scheme. Whilst positive about the reforms, we have a few points which we feel need to be confirmed ahead of the reforms being fully published later this year. See below: <ul style="list-style-type: none"> The reforms seem to be centred around transmission connections or distribution connections which have a transmission impact and have been through the Project Progression / Statement of Works process. However, there is yet to be any information released on how DNOs will replicate this process. DNOs should look to replicate the system proposed in order for projects which are more advanced than others in terms of land rights and planning to move up the distribution queue above projects which are slow moving (i.e. no land rights and planning progress demonstrated). This is critical to the whole process of accelerating connections as without this a project could find itself promoted up the queue at transmission level but still find itself low down in the queue at distribution level. We have seen in recent times DNOs to be slow moving in terms of progressing distribution reinforcements while NGESO progress works on the transmission network. 	

	<p>This poses a risk that the efforts to accelerate distribution projects which are ready or nearly ready to connect will fail.</p> <p>In summary DNOs processes need to be aligned with those of the transmission network ahead of go live on 1st January 2025.</p> <ul style="list-style-type: none"> • There is a lack of detail on how projects which have land rights, planning and funding in place will be accelerated ahead of those projects which just have land rights and a route to planning in place. Projects may well have met the Gate 2 criteria but may not be ready to connect for a year plus given the timescales required for securing planning consent and getting funding in place. <p>There should be focus paid in the first instance to accelerating shovel ready projects, the low hanging fruit of the queue. By 1st January 2025 we anticipate having over 200MW of projects in this category.</p> <ul style="list-style-type: none"> • There is a requirement for DNOs to submit qualifying Gate 2 projects to NGESO at various points each year however in recent years we have experienced significant delays in DNOs submitting projects to NGESO for transmission impact assessment (Project Progression / Mod Apps). Statutory obligations need to be set out for DNOs to ensure projects are not held back for several months / years before they are submitted to NGESO. • Information regarding transmission and distribution queues should be made readily available to the industry with full details on each projects including land rights status, planning status and funding status. This will enable developers to understand how they may be promoted up the queue and encourage developers to progress projects through these various stages to secure an accelerated / improved connection. Currently there is a distinct lack of visibility available across the industry. <p>We would be happy to participate in further discussions on this topic and given the input which we provided to NGESO and DNOs as they rolled out Technical Limits at the end of 2023, we believe we are well placed to provide valuable feedback on the grid reforms process.</p>	
4	<p>Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?</p>	<p><input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section)</p> <p><input checked="" type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>		

Specific Workgroup Consultation questions

5	<p>Do you agree with the elements of the proposed solution for CMP435? <i>Please note that the application of these elements may be different to CMP434, therefore please answer the questions in respect to CMP435.</i></p>
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<p>Elements 2,4,6,7,12,15,17 and 18 are not part of the CMP435 Proposal and is only part of the CMP434 Proposal. Element 10 is proposed to be codified within the STC through modification CM095.</p> <p>Please provide rationale for your answer and any suggestions for improvement to each element?</p>	
<p>Element 1: Proposed Authority approved methodologies and ESO guidance (see Page 8-10,29)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<p>Element 3: Clarifying which projects go through the Primary Process (See pages 10-11,29-31)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<p>Element 5: Clarifying any Primary Process differences for customer groups (See pages 11-12,32)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<p>Element 8: Longstop Date for Gate 1 Agreements (See pages 12-13, 32-33)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<p>Element 9: Project Designation (See pages 14-15, 33-34)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<p>Element 11: Setting out the criteria for demonstrating Gate 2 has been achieved and setting out the obligations imposed once Gate 2 has been achieved (See pages 16-21, 34-39)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<p>Element 13: Gate 2 Criteria Evidence Assessment (See pages 22-23, 39-40)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<p>Element 14: Gate 2 Offer and Project Site Location Change (See pages 23-24, 40-41)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<p>Element 16: Introducing the proposed Connections Network Design Methodology (CNDM) (See pages 24-25, 41-42)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<p>Element 19: Contractual changes (See pages 26-28, 43-46)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<p>Element 20: Cut Over arrangements (See page 28, 47)</p>	<input type="checkbox"/> Yes

		<input type="checkbox"/> No
	Click or tap here to enter text.	
6	<p>Are there any elements of the proposed CMP435 solution - as per Q5 - which you believe are not appropriate to include when you consider how to most effectively implement TMO4+ to projects in the existing contracted background (as opposed to the process for new applicants via CMP434)?</p> <p>If yes, please provide supporting justification.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	
7	<p>In relation to Q6, are there any features which you believe are missing in the proposed CMP435 solution that would more effectively facilitate implementation of TMO4+ to the existing contracted background.</p> <p>If yes, please provide details and justification.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
8	<p>Do you believe any groups of projects should be exempt from the scope of CMP435 or from some elements of the proposed solution? If so, please advise on which groups and elements and provide rationale to why.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	
9	<p>Do you believe that the proposed solution could duly or unduly discriminate against any particular types of projects? If so, do you believe this is justified?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	