

**CUSC Alternative Form – Non Charging****CMP434 Alternative Request 6:**

**Overview:** To amend the threshold at which embedded schemes will follow the Primary Process (Element 5)

**Proposer:** Steffan Jones, Electricity North West Limited

I/We confirm that this Alternative Request proposes to modify the non - charging section of the CUSC only

**What is the proposed alternative solution?**

Broadly in line with Element 5 of the Original Proposal, but we propose that the threshold be amended to state that schemes that are EHV and 132kV connected i.e. voltages above 20,000; be included within the Primary Process, but schemes which are HV connected i.e. voltages up to and including 11kV are not included in the primary process.

This is due to HV schemes having limited impact on the Transmission network.

**What is the difference between this and the Original Proposal?**

The point at which for small, embedded generation schemes that the Primary Process is currently set (in England and Wales) is 1MW.

This means that a large number of generally nimble, low-cost schemes connecting to the embedded DNO (and iDNO) HV networks are being tied up in the constraint, time and cost of the wider transmission impact assessment and overall Transmission network design review arrangements.

This can have an unduly disproportionate impact on what are often low impact / low-cost schemes, that are net zero enablers at a local or community level, offsetting local or community demand requirements and which become unviable when the Transmission Impact Assessment is brought in to play.

When the view of overall impact on the wider Transmission network is considered against the impact on these small nimble schemes that benefit local communities and support the transition to Net Zero, pulling them out of the process is, in our view more than justified.

The inclusion within the primary process (TMO4+/TIA) can in many cases become the significant cost and time driver for these projects, expanding connection time profiles 2-3 times just to go through the process, without consideration to actual wider network constraint issues.

Within England and Wales, schemes connected to the DNO (or iDNO’s) High Voltage network (6.6kV or 11kV) are typically four network “levels” down from the Transmission network, with three levels of transformation sitting between them and the 275kV (or 400kV) networks.

Our proposal is that schemes connected at ‘high voltage’, i.e. voltages up to and including 11kV are excluded from the Primary Process.

**What is the impact of this change?**

Proposer’s Assessment against CUSC Non-Charging Objectives	
Relevant Objective	Identified impact
(a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;	<b>Positive:</b> Will remove the lower capacity element from the primary process. Will remove unduly

	disproportionate delays from these schemes
(b) 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;	<b>Positive:</b> will allow more of these smaller schemes to progress, will help facilitate and develop the community energy sector.
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and	<b>None</b>
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	<b>Positive:</b> will remove smaller schemes from the process, that will remove from the process many of the schemes that don't fully understand or are able to manage the requirements of process compliance.
*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.	

**When will this change take place?**

**Implementation date:**

Aligned with the Original Proposal

**Implementation approach:**

Aligned with the Original Proposal

**Acronyms, key terms and reference material**

Acronym / key term	Meaning
DNO	Distribution Network Operator
EHV	Extra High Voltage voltages above 20,000 volts
HV	High Voltage; voltage above 1,000V and up to 20,000V
iDNO	Transmission Connected Independent Distribution Network Operator
TM04+	ESO's (Transmission) Connection Reform Proposal as covered by CMP434
TIA	Transmission Impact Assessment