

Workgroup Consultation

Response Proforma

CMP434: 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 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:	Christie Sims	
Company name:	British Solar Renewables Ltd	
Email address:	Christie.sims@bsrenergy.com	
Phone number:	+44 7885 971 119	
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 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)

	<input checked="" type="checkbox"/> Non-Confidential (<i>this will be shared with industry and the Panel for further consideration</i>)
	<input type="checkbox"/> Confidential (<i>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</i>)

For reference the Applicable CUSC (non-charging) Objectives are:

- a) *The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- 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;*
- c) *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.

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

Standard Workgroup Consultation questions	
1	<p>Do you believe that the Original Proposal better facilitates the Applicable Objectives?</p> <p>Mark the Objectives which you believe the Original solution better facilitates:</p> <p>Original <input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</p> <p>I believe that something needs to be done to allow the efficiency of the network to improve, but the implementation of this overall feels rushed. There doesn't seem to be consideration of how if a DNO-level project leapfrogs others in the transmission queue, how they're going to progress at the DNO level. Some DNO connection dates are delayed due to 132kV replacement boards that the DNO has to install at the GSP, this would require milestone alterations at the ESO level for projects that achieve Gate 2 far ahead of when the DNO can connect them. There have been some non-EIA planning applications that require two years of wintering bird surveys. Which also puts estimates planning dates out of alignment despite a developer doing everything they can to get the project into planning.</p>
2	<p>Do you support the proposed implementation approach? (see pages 59-61)</p> <p><input checked="" type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>Distribution projects can sort out land rights, which currently seems to be the criteria for Gate 2, in the early stages of the projects depending on the landowner's approach to unknown connection dates. This should allow DNO projects to move to Gate 2 without artificially going through Gate 1, where Gate 1 is already delayed due to the reliance on the DNO processing the application.</p>
3	<p>Do you have any other comments?</p> <p>Land rights on their own are unlikely to noticeably reduce the queue, due to most projects having those available. However any requirement to have committed planning ahead of Gate 2 would be putting planning in blind. Some local authorities are not interested in allowing planning extensions, stating connection delays are developers risk, and some planning permissions are based on start of construction, not start of operation, so the approach of a technical start to maintain planning validity is not the panacea it might have been presented as.</p> <p>I would also like to add that the extremely short turnaround for this consultation means reviewing and assessing all of the code changes has been extremely difficult. The consultation timing for when a large percentage of the workforce will</p>

	be on annual leave means the range and quality of the responses is likely to be lower than usual. While the urgency of the code review is understood, this consultation has been rushed.	
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 type="checkbox"/> No

Specific Workgroup Consultation questions

5	Do you agree with the elements of the proposed solution? Element 7 has been de-scoped and Element 10 is proposed to be codified within the STC through modification CM095 . Please provide rationale for your answer and any suggestions for improvement to each element?	
	Element 1: Proposed Authority approved methodologies and ESO guidance (see pages 9-10, 55)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
The extremely short turnaround times coupled with the expectation not to include any industry voices makes this impossible to agree with. While I appreciate this is an urgent review, this is one of the biggest changes to the basic setup of grid applications that has been looked at in years, moving from “First Come First Served”, and while the overall aims are valuable, the impact can’t be investigated without the Gate 2 requirements being clear		
	Element 2: Introducing an annual application window and two formal gates, which are known as Gate 1 and Gate 2 (i.e. the Primary Process) (see pages 11, 35-36)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Separating into windows could allow a clearer focus and direction for the reinforcement required for the transmission network. The 2 gate process appears to help push forward connections, but the details of the Gate 2 criteria are the critical part to ensure progress is pushed without making developments impossible		
	Element 3: Clarifying which projects go through the Primary Process (see pages 11-12, 35-36)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
	Element 4: Significant Modification Applications concept, including the proposed criteria and the proposed level of codification (see pages 12-13, 36-39)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
It’s impossible to have a clear view on this without knowing the actual details behind it, on what constitutes a Significant Modification. Otherwise the Significant		

Modification rule could end up being another barrier to standard flexibility required in developing a large-scale long-lead project	
Element 5: Clarifying any Primary Process differences for customer groups (see pages 13-14, 35-36)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The more automatic or timely inclusion of distributed projects as Gate 1 projects helps mitigate some of the issues, as previously DNO level projects have lost out due to slow DNO SOW applications etc meaning these schemes weren't entered into the transmission queue in a timely manner.	
Element 6: Setting out the process and criteria in relation to Application Windows and Gate 1, including introducing an offshore Letter of Authority equivalent as a Gate 1 application window entry requirement for offshore projects (see pages 15-16, 39-40)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
Element 7: Fast Track Disagreement Resolution Process (de scoped from this modification – see pages 16, 58)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
Element 8: Longstop Date for Gate 1 Agreements (see pages 16, 40-41)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Long stop for Gate 1 is fine, as long as flexibility is allowed due to changes in POC from NGET. In some cases, the POC is going to be 10 miles away from original positioning. Long stop date will be required to prevent everything sitting in Gate 1 forever that isn't viable.	
Element 9: Project Designation (see pages 17-18, 48-49)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
This could be used as a bias for certain technologies, again it's asking for commentary ahead of publishing the details of the criteria. In theory there is nothing wrong with prioritising nation-critical infrastructure, but it's important that these kind of projects have a high barrier to qualify.	
Element 10: Connection Point and Capacity Reservation (proposed to not be codified within the CUSC, but is intended to be codified within the STC through modification CM095 – see pages 18-20 and the CM095 Workgroup Consultation , pages 6-10)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Reserving bays for reinforcement rather than projects, as long as this practice IS limited, should help speed up reinforcement of the network.	
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 20-24, 42-46)	<input type="checkbox"/> Yes <input type="checkbox"/> No

<p>The Gate 2 criteria is the part of this that needs the closest inspection, as it is by this criteria that the whole impact of the scheme will be measured. Too easy to pass and there will be no real change to the connection queue, but requiring planning “blind” without a confirmed connection date will make it very difficult for any developer to progress schemes reliably. The requirement to continue being compliant with Gate 2 is good, allowing a time for renegotiation (land agents being a key slow down in this process). I would highlight that the land requirements for “100% of the project” can be open to some argument. For example, shared technology schemes can meet their capacity requirements with BESS, and still have the option of searching for more solar land, assuming they have a shared BESS/solar grid offer. Taking away this option for increasing land later would artificially reduce the amount of generation installed in the UK, and there is no clear disadvantage for allowing this flexibility as long as there is sufficient land for the BESS to use all of the allocated grid capacity. This subtlety on land requirements should remind flexible and shouldn’t impact the effectiveness of the Gate 2 process. Requiring the full land for ALL of the technologies involved, rather than just enough technology of at least one type to reach the TEC, takes away any potential betterment of projects of which several are still likely to be in development for 10 years. This wouldn’t reflect a forward thinking approach.</p>	
<p>Element 12: Setting out the general arrangements in relation to Gate 2 (see pages 25-26, 47)</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>
<p>Click or tap here to enter text.</p>	
<p>Element 13: Gate 2 Criteria Evidence Assessment (see pages 26-27, 47-48)</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>
<p>The use of self-certification letters does cut down on the admin of both sides of the contract, which is useful. I’ve mentioned reservations about the details of the red line in element 11 above</p>	
<p>Element 14: Gate 2 Offer and Project Site Location Change (see pages 28, 46)</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>
<p>The ability for TSO projects to change their red line makes sense in terms of their POC changing significantly. However it does create a distortion as large GSP-connected DNO projects are also susceptible to these levels of location change, and they aren’t allowed to change their red line at all (beyond NGED’s 50% rule, which won’t help in this instance)</p>	
<p>Element 15: Changing the offer and acceptance timescales to align with the Primary Process timescales (e.g. a move away from three months for making licenced offers) (see pages 29, 42-46)</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>
<p>Click or tap here to enter text.</p>	
<p>Element 16: Introducing the proposed Connections Network Design Methodology (CNDM) (see pages 29, 53-55)</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>

<p>The announcement of there being a methodology without being clear on that methodology means offering opinions on this is difficult. .</p>	
<p>Element 17: Introducing the concept of a Distribution Forecasted Transmission Capacity (DFTC) submission process for Distribution Network Operators (DNOs) and transmission connected Independent Distribution Network Operators (iDNOs) to forecast capacity on an anticipatory basis for Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations aligned to the Gate 1 Application Window (see pages 30-33, 51-53)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Speeding up the Gate 1 process for DNO's, where traditionally distribution has lost out and lagged behind the transmission queue, is a welcome change.</p>	
<p>Element 18: Set out the process for how DNOs and transmission connected iDNOs notify the ESO of Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations which meet Gate 2 criteria (see pages 33-34, 51-53)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>6 Are there any elements of the proposal which you believe should not be included as part of this proposed solution, which the Proposer believes represents the 'Minimum Viable Product' reforms required to the connections process? If not, why not? (Please note the element number in each of your responses if applicable)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>7 As per question 6, are there any additional features which you believe should be included as part of Minimum Viable Product reform to the connections process?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>8 Do you agree that the Gate 1 process should be a mandatory process step, or do you think Gate 1 should be an optional</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

	<p>process step with projects being able to apply straight into the Gate 2 process if the project meets both the relevant Gate 2 and Gate 1 criteria?</p>	
<p>Projects should be able to apply straight to Gate 2 if they qualify. Artificially making projects go through Gate 1 when they're ready to progress to Gate 2 is actually slowing</p>		
9	<p>Do you believe that the proposed Gate 1 and Gate 2 process could duly or unduly discriminate against any types of projects? If so, do you believe this is justified?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>		
10	<p>Please provide your views on the proposed options ((a) to (e) on page 45) to mitigate the risk of requiring a developer to submit their application for planning consent earlier than they would in their development cycle (with the risk this consent could expire and any extension from the Planning Authority is not automatic).</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Several planning authorities view grid delays as “developer risk” and therefore are not interested in extending planning once it is achieved. Some planning permissions also detail operational life from the start of construction rather than commercial operation or energisation. A: This seems appropriate, although does limit the benefits of accelerated connections which unexpectedly accelerate connections. B: It would be useful to check whether the planning process reaches 10% of the total cost of a project, or this might be a later milestone than A: C: This would reduce the issues created from uncertainty. Not allowing this would cause some developments to get planning permission which cannot be used due to changes in the GSP POC D: This is also a reasonable approach, with the only downside being inability to gain from accelerated connections. E: This would be essential in case of any unexpected delays in National Grid works, which frequently overrun.</p>		
11	<p>Do you agree that DFTC should be included as part</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	<p>of CMP434? If not, do you believe that the reformed connections process can function without DFTC? Please justify your answer. (see pages 30-34, 51-53)</p>	
<p>Individually processing distribution sites will add even more administrative burden onto DNOs and the ESO, which already will be done for Gate 2. The DNO's struggle to submit SOW on time as it stands, and the DFTC will assist in not making this situation and the time lag for distribution projects to be on the transmission queue worse.</p>		
<p>12</p>	<p>The Proposer intends to set out supporting arrangements for TMO4+ via a combination of guidance and methodologies (e.g. DFTC, CNDM, Project Designation, Gate 2 Criteria). Do you anticipate any issues with having these outside of Code Governance? (see Pages 9-10, 55)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>By having all of these items outside of the code, the code changes can't really be responded to. As the impacts of the changes can't be foreseen without any of the associated guidance.</p>		