

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:	Graham Lear	
Company name:	National Grid ESO	
Email address:	Graham.lear@nationalgrideso.com	
Phone number:	07709 835895	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input checked="" 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:

- a) *efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act*
- b) *development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission*
- c) *facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity*
- d) *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	<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 checked="" type="checkbox"/>C <input type="checkbox"/>D <input checked="" type="checkbox"/>E <input checked="" type="checkbox"/>F <input type="checkbox"/>G</p> <p>We believe the Original Proposal is required to enable reform of the connections process and better facilitates the STC objectives as follows:</p> <p>Positive against Objectives A, B and E through the introduction of a more efficient batched assessment process for connection applications. This delivers a more coordinated approach to planning and development of the network, and increased benefits to customers and consumers as it will allocate capacity to projects that are ready to proceed, while studying applications in batches should also lead to lower overall costs. Furthermore, it aligns with and compliments the proposed Strategic Spatial Energy Plan (SSEP) and Centralised Strategic Network Plan (CSNP).</p> <p>Our view is the Original Proposal is positive against Objectives C and F as readier, more viable projects are prioritised allowing them to connect more quickly. Furthermore, the proposed changes to the bay reservation process facilitates network competition and aids the connection of new coordinated offshore wind projects.</p> <p>We believe that the Original Proposal is neutral against Objectives D and G.</p>
2	<p>Do you support the proposed implementation approach? (see page 12)</p> <p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>We support the general proposed implementation approach but recognise that the process steps and timescales may need to change post consultation.</p>
3	<p>Do you have any other comments?</p> <p>Our solution is highlighted in the consultation document. However, we are keen to hear from stakeholders who feel that the proposed solution can be improved in any areas and any subsequent feedback will be considered in developing our final proposal. This is true of any of the areas examined within this consultation and we look forward to receiving any and all feedback on CM095. Our views are presented</p>

	as they were at the time of responding to this consultation and may change if we receive feedback during the consultation.
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) <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 components of the proposed solution? Please provide rationale for your answer and any suggestions for improvement to each component.</p>
	<p>Component A: Proposed Reformed Connections Process and Timescales, including ESO/TO obligations (see pages 5-6)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>We believe that the Proposed Reformed Connections Process clearly defines the responsibilities of both the ESO and TOs in respect of the Gate 1 and Gate 2 process.</p>
	<p>Component B: Connections Network Design Methodology (see pages 6, 8-9)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>An ESO/TO Connections Network Design Methodology (CNDM) will need to be developed to establish how connections network design will be undertaken in relation to Gate 1 and Gate 2 processes. Our view is that the CNDM should only be codified at high level within the STC on the basis/assumption that the Authority introduces a licence obligation for the ESO/TOs to have an agreed methodology in place which must be complied with.</p>
	<p>Component C: Connection Point and Capacity Reservation (see pages 6-10)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>We believe that it is important for the current STCP bay reservation process to be broadened to connection points and capacity, as well as extended to cover network related to the facilitation of competition (i.e., in relation to CATOs) and co-ordinated offshore network design, protecting these on a time-limited basis. This ensures that connection points and capacity that are required for specific purposes are not utilised by projects that have met the Gate 2 criteria as part of the Gate 2</p>

	process and contributes to a more co-ordinated network design associated with offshore projects, facilitating network competition.
6	<p>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)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>At a high-level, we believe that the STC/STCP impacts resulting from the CMP434 proposal have been captured with further development required following the conclusion of the consultation in order to fully develop the required legal text.</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>The CM095 proposal directly interacts with CMP434 (Implementing Connections Reform) and has interactions with CMP435 & CM096 (Application of Gate 2 Criteria to existing contracted background). Due to these close interactions, there is a risk that any changes to the current implementation approach for CM095 will have impacts on the other proposals listed above.</p>

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