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Code Administrator 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@nationalenergyso.com by **5pm GMT on 26 November 2024**. Please note that any responses received after the deadline or sent to a different email address will not be accepted.

If you have any queries on the content of this consultation, please contact cusc.team@nationalenergyso.com

Respondent details	Please enter your details	
Respondent name:	Als Scrope, Stakeholder Engagement Manager	
Company name:	Northland Power UK Limited, Spiorad na Mara Limited & Havbredey Limited	
Email address:	Als.Scrope@northlandpower.com	
Phone number:	+44 7309 658733	
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 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 Panel or the industry for further consideration*)

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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 Code Administrator Consultation questions		
1	Please provide your assessment for the proposed solutions against the Applicable Objectives?	Mark the Objectives which you believe the proposed solutions better facilitate:
		Original <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM1 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM2 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM3 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM4 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM5 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM6 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM7 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		Click or tap here to enter text.
2	Do you have a preferred proposed solution?	<input type="checkbox"/> Original <input type="checkbox"/> WACM1 <input type="checkbox"/> WACM2

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		<input type="checkbox"/> WACM3 <input type="checkbox"/> WACM4 <input type="checkbox"/> WACM5 <input checked="" type="checkbox"/> WACM6 <input type="checkbox"/> WACM7 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		<p>We prefer WACM6 calling for codification of the Methodologies and Guidance Documents</p> <p>Under element 1 we note that the NESO is proposing that much of the detail relating to the proposals are contained in either uncodified Methodologies or uncodified Guidance Notes, the latter of which have not been seen at the time of this consultation.</p> <p>The Connection Reforms present very material changes for the industry and the detail relating to these changes will have been developed in short timescales with relatively limited consultation time. Furthermore the Guidance Documents have not yet been shared.</p> <p>As a result of the above, we believe that once the proposals are finalized and road-tested, there will be a need for significant on-going refinement of the new processes. Lack of codification will remove the ability for industry to bring forward proposed changes to the new arrangements, we think this presents a risk to industry and a lost opportunity for continuous improvement.</p> <p>We note that the CMP434 Working Group also had significant concerns with regard to the lack of codification of the Methodologies.</p>
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>Whilst we support the principles of the Implementation Approach we believe that the NESO should provide at</p>

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		least 8 weeks notice to the opening of the first application windows (as opposed to 4 weeks).
4	Do you have any other comments?	<p>We continue to have concerns that guidance documents have not been provided as part of this consultation, or other parallel consultations. We feel that these would have been helpful in providing stakeholders with a clearer view of NESO's interpretation of the proposals and their implementation. This increases the risk of conflict between NESO and other stakeholders when the new arrangements are road-tested.</p> <p>In particular, we were disappointed to see that no further update was given on the draft content of the Significant Modification guidance document. The August working group consultation provided a table of differing types of modifications and provided a preliminary view on whether NESO viewed each type as significant or not. It would have been helpful to see the latest proposals in that regard.</p>
5	Do you agree with the Workgroup's assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the CUSC?	<input type="checkbox"/> Yes <input type="checkbox"/> No
		<p>Unsure - we don't feel well placed to answer this question.</p>