

Public

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:	Paraic Higgins	
Company name:	ESB GT	
Email address:	Paraic.higgins@esb.ie	
Phone number:	+353 1 676 5831	
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*)

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

Public

- 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 checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM1 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM2 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM3 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM4 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM5 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM6 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM7 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		ESB GT welcomes the opportunity to respond to this consultation. In general terms, the original proposal better facilitates the applicable objectives (a) (b) and (d) relative to the baseline as set out on pages 75 and 76 of the consultation (with neutral impact on (c)), if the appropriate NESO and TO licence changes are approved.

Public

		<p>WACM1 does not promote the harmonisation of rules across GB and thus does not better facilitate the objectives.</p> <p>WACM5 removes the possibility for Project Designation by the NESO, which as it has stated in its corresponding methodology proposal, it only envisages using in exceptional circumstances.</p> <p>ESB GT believes that WACMs 2, 3, 4, 6 and 7 better facilitate the objectives better than the baseline <u>and</u> the Original proposal.</p>
2	Do you have a preferred proposed solution?	<p><input type="checkbox"/> Original</p> <p><input type="checkbox"/> WACM1</p> <p><input type="checkbox"/> WACM2</p> <p><input type="checkbox"/> WACM3</p> <p><input type="checkbox"/> WACM4</p> <p><input type="checkbox"/> WACM5</p> <p><input checked="" type="checkbox"/> WACM6</p> <p><input type="checkbox"/> WACM7</p> <p><input type="checkbox"/> Baseline</p> <p><input type="checkbox"/> No preference</p> <p>As discussed in Question 1, ESB GT believes that WACMs 2, 3, 4, 6 and 7 facilitate the objectives better than the baseline <u>and</u> the Original proposal.</p> <p>In addition, ESB GT supports the “best” option as WACM6 as it reflects the concern we previously outlined on governance, transparency, consultation process and implementation of methodologies outside of the CUSC modification process and the CUSC. WACM6 provides a workable and reasonable solution to this issue based on gated review.</p>
3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Implementation approach</p>

Public

		<ol style="list-style-type: none"> 1. New applications and Significant Modification Applications submitted after the implementation date should be submitted within the new Gate application window process. However, the first window date should reflect a complete and robust consultation and decision process relative to CMP434, CMP435 and all guidelines and methodologies related to the connections process. Applicants should have visibility of all final procedures and guidelines <u>at least</u> 1 month in advance of the window opening. 2. Agree that, as per CMP435, existing projects that do not meet Gate 2 criteria should become Gate 1 projects. Any projects that meet Gate 2 criteria should be eligible to enter Gate 2, facilitating the NESO's goal of expediting delivery of key projects required to obtain GB's climate ambitions at the pace required.
4	Do you have any other comments?	No further comments.
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 <hr/> Click or tap here to enter text.