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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:	Alastair Southworth	
Company name:	Harmony Energy Ltd	
Email address:	Alastair.southworth@harmonyenergy.co.uk	
Phone number:	07495398013	
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)

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:

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- 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 <input type="checkbox"/> WACM3

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		<input checked="" type="checkbox"/> WACM4 <input checked="" type="checkbox"/> WACM5 <input checked="" type="checkbox"/> WACM6 <input checked="" type="checkbox"/> WACM7 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		WACM 1-7 all have merit in adding additional depth to the original proposal.
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Click or tap here to enter text.
4	Do you have any other comments?	<p>Element 2 - A moratorium on applications should be considered for a short period (6-12 months?) until all parties including DNOs and TOs can “catch up” with the backlog of admin associated with the current pipeline. This would allow correct allocation of gates and a full understanding of the state of the queue’s validity. Administration of work is currently our biggest present concern and though these connections reforms are required, needed and appropriate, we are concerned on the impact of these reforms on an already stretched workforce within the DNOs and TOs remit.</p> <p>In respect of the point that redline boundaries are to be assesses to ensure multiple projects are not on the same land, it is Harmony’s view that this should also be extended to cross checking against DNO projects to ensure projects are not holding both distribution and transmission connections for the same site.</p> <p>However, on a wider point, the proposal identifies a wholesale revision is needed to the connections process, yet the proposal does not reflect a whole system approach, and falls well short of that objective.</p> <p>For over two years now, developers have been feeding into discussions and consultations with ESO around the broken</p>

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		<p>processes and systems at the interface between DNO's and TO's (The D/T boundary).</p> <p>Everything from loss of queue position due to a broken SoW/Mod App process, DNO tardiness in mod app submissions through to unwritten charging policies remain unresolved which presents significant barriers to DNO projects.</p> <p>We understand that the proposal as written is to bring in changes quickly and efficiently to the Transmission connection process, but it is our view that this proposal should not be presented as a wholesale revision to the connections process as it is clearly missing the most important part of the process which is the interface between DNO's and TO's.</p> <p>It is misleading to industry, government, and the public that this is a wide connection reform proposal, as it is not.</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 checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No