

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:	Joseph Henry	
Company name:	National Grid ESO	
Email address:	Joseph.henry2@nationalgrideso.com	
Phone number:	07970673220	
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 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	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the Original solution better facilitates:
		Original <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
<p>The ESO has proposed CMP434 to enhance and reform the connections process. The background to this can be found in the workgroup consultation document on p5. Our view remains the same, that this modification is required to reform and improve the connections que to support faster connections to the network,</p> <p>Against objective A, our proposal is positive as it introduces a gated process that prioritises readier and/or more viable projects enabling us to help the government to meet its Net Zero targets. Currently, project developers are waiting too long to connect, and this is hindering progress to deliver Net Zero. Application windows will also allow a coordinated network design closely aligned with ESO’s Centralised Strategic Network Plan and that facilitate anticipatory investment to ensure transmission works are delivered efficiently.</p> <p>CMP434 is also positive against objective B as it will allow for quicker connections for viable projects needed to deliver Net Zero. Currently, project developers are waiting too long to connect, and this is hindering progress to deliver Net Zero.</p> <p>CMP434 is neutral against objective C.</p> <p>Against objective D, the proposal is positive insofar as it allows increased co-ordination and efficient network design for connections, whilst also delivers benefits for customers and consumers as allocates capacity more efficiently to projects that are ready to proceed and studying connections applications in batches should lead to lower overall costs.</p>		
2	Do you support the proposed implementation approach? (See pages 58-59)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		We support the general proposed implementation approach but recognise that the process steps and timescales may need to change post consultation.
3	Do you have any other comments?	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

	<p>areas and any subsequent feedback will be taken into account 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 CMP434. Our views are presented as they were at the time of responding to this consultation and may change if we receive feedback during the consultation.</p>	
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>We are aware that other workgroup members may wish to raise alternatives.</p>		

Specific Workgroup Consultation questions		
5	<p>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?</p>	
	<p>Element 1: Proposed Authority approved methodologies and ESO guidance (see Pages 9-10, 55)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>We believe Element 1 is required to establish how methodologies are approved by the Authority and to establish where the ESO will set out guidance.</p>		
	<p>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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>We believe that an annual application window with two formal gates is the best and most efficient way to administer the Primary Process.</p>		
	<p>Element 3: Clarifying which projects go through the Primary Process (See pages 11-12, 35)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>The proposed solution gives requisite clarity as to which projects would go through the primary process.</p>		
	<p>Element 4: Significant Modification Applications concept, including the proposed criteria and the proposed level of codification (See pages 12-13, 36-39)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>The proposed solution makes the process around Significant Modification Applications clear and fair for Users.</p>		
	<p>Element 5: Clarifying any Primary Process differences for customer groups (See pages 13-14, 35-36)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

The proposed solution clarifies any Primary Process differences around Significant Modification Applications clear and fair for Users.	
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
We believe the process and criteria are clear within the proposal, and that an Offshore Letter of Authority or equivalent should be implemented as part of this proposal, following the approval of the onshore requirement as part of CMP427.	
Element 7: Fast Track Disagreement Resolution Process (de scoped from this modification – see pages 17, 58)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
We have descoped Element 7 from our proposal.	
Element 8: Longstop Date for Gate 1 Agreements (See pages 16, 40-41)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
We support that the Longstop Date (which is a forward-calculated date of 3 years from Gate 1 offer acceptance, with the ESO having discretion to extend this timeframe) is implemented in its current form as part of this proposal.	
Element 9: Project Designation (See pages 17-18, 48-49)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
It is proposed to create a concept and an associated non-codified Methodology (proposed to be approved by the Authority) that would enable the ESO to designate specific projects in line with the proposed Project Designation Methodology. We believe that this should form a part of this proposed solution.	
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 19-21 and the CM095 Workgroup Consultation)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
We believe that element 10 should be codified as part of CM095.	
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 20-25, 42-46)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Our view is that Element 11 is required to clarify the criteria for reaching Gate 2, and that the proposal clearly sets out the obligations for projects once this has been attained.	
Element 12: Setting out the general arrangements in relation to Gate 2 (See pages 25-26, 46-47)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The proposed solution clarifies the general arrangements in relation to Gate 2.	

	<p>Element 13: Gate 2 Criteria Evidence Assessment (See pages 26-27, 47)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>The evidence assessment set out in the proposal is required to ensure that evidence provided for each project is sufficiently robust.</p>		
	<p>Element 14: Gate 2 Offer and Project Site Location Change (See pages 28, 46)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>At the time of the consultation, we are of the view that this element should form part of the consultation.</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>At the time of the consultation, we are of the view that this element should form part of the solution.</p>		
	<p>Element 16: Introducing the proposed Connections Network Design Methodology (CNDM) (See pages 29, 53-55)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>At the time of the consultation, we are of the view that this element should form part of the solution.</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>At the time of the consultation, we are of the view that this element should form part of the solution.</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>At the time of the consultation, we are of the view that this element should form part of the solution. Element 18 is required as a standalone element regardless of the inclusion of DFTC.</p>		
<p>6</p>	<p>Are there any elements of the proposal which you believe should not be included as part of this proposed solution, which the Proposer believes</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

	<p>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>Please see our answer to question 3.</p>		
7	<p>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 checked="" type="checkbox"/> No</p>
<p>Please see our answer to question 3.</p>		
8	<p>Do you agree that the Gate 1 process should be a mandatory process step, or do you think Gate 1 should be an optional 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><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>At the time of the consultation, we are of the view that Gate 1 should be a mandatory process step to ensure that all projects meet the required standard for connection.</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 checked="" type="checkbox"/> No</p>
<p>Whilst there are proposed process differences in certain circumstances, we do not believe these are discriminatory differences.</p>		
10	<p>Please provide your views on the proposed options ((a) to (e) on page 46) to mitigate the risk of requiring a developer to submit their application for planning consent earlier than they would in their</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	<p>development cycle (with the risk this consent could expire and any extension from the Planning Authority is not automatic).</p>	
<p>The ESO does not yet have a view on the best option and will look at the feedback from this consultation before we solidify a position.</p>		
<p>11</p>	<p>Do you agree that DFTC should be included as part of CMP434? If not, do you believe that the reformed connections process can function without DFTC? Please justify your answer.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Yes, as the proposed Gate 1 solution looks to include a co-ordinated Transmission and Distribution Network design we believe DFTC needs to be included to facilitate this to incorporate distribution and transmission forecasts.</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?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>We do not anticipate any issues with the arrangements set out within our proposal. The ESO already produce guidance on varying issues. The DTFC guidance will be owned by the Energy Networks Association.</p>		