

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:	Luke Scott	
Company name:	Northern Powergrid	
Email address:	Luke.scott@northernpowergrid.com	
Phone number:	07549445961	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" 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 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 checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D
	We agree that the proposers' solutions meet the objective statements listed in the 'identified impact' section in the consultation.	
2	Do you support the proposed implementation approach? (see pages 59-61)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Click or tap here to enter text.	
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input checked="" type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input type="checkbox"/> No
	<ul style="list-style-type: none"> • Element 4. Significant Modification Applications <ul style="list-style-type: none"> ○ The current proposal does not align with the current ENA guidance NPg use for 'Allowable Change' the two points in question are below: <ul style="list-style-type: none"> ▪ Request to change generation technology type or mix of generation technology types from any one technology type (or mix of technology types) to a different technology type (or mix of technology types) and; ▪ Request to change location for the Point of Supply (PoS). ○ We feel Element 4 will discriminate against the customers in the queue awaiting connection date who are 'shovel ready' with a secured land location and technology that won't change (they don't need to change) we agree with all other parts within Element 4 Significant Modification Applications except the above. ○ Work group alternative: We feel the process should mirror the as is listed in the Allowable change ENA guidance document. 	

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 style="text-align: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Click or tap here to enter text.</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 style="text-align: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Click or tap here to enter text.</p>	
<p>Element 3: Clarifying which projects go through the Primary Process (see pages 11-12, 35-36)</p>	
<p style="text-align: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Click or tap here to enter text.</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 style="text-align: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>Element 4. Significant Modification Applications</p> <ul style="list-style-type: none"> ○ The current proposal does not align with the current ENA guidance NPg use for ‘Allowable Change’ the two points in question are below: <ul style="list-style-type: none"> ▪ Request to change generation technology type or mix of generation technology types from any one technology type (or mix of technology types) to a different technology type (or mix of technology types) and; ▪ Request to change location for the Point of Supply (PoS). ○ We feel Element 4 will discriminate against the customers in the queue awaiting connection date who are ‘shovel ready’ with a secured land location and technology that won’t change (they don’t need to change) we agree with all other parts within Element 14 Significant Modification Applications except the above. We feel the process should mirror the as is listed in the Allowable change ENA guidance document. 	
<p>Element 5: Clarifying any Primary Process differences for customer groups (see pages 13-14, 35-36)</p>	
<p style="text-align: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Click or tap here to enter text.</p>	
<p>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</p>	
<p style="text-align: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

a Gate 1 application window entry requirement for offshore projects (see pages 15-16, 39-40)	
Click or tap here to enter text.	
Element 7: Fast Track Disagreement Resolution Process (de scoped from this modification – see pages 16, 58)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
Element 8: Longstop Date for Gate 1 Agreements (see pages 16, 40-41)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
Element 9: Project Designation (see pages 17-18, 48-49)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
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 18-20 and the CM095 Workgroup Consultation , pages 6-10)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
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 20-24, 42-46)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
Element 12: Setting out the general arrangements in relation to Gate 2 (see pages 25-26, 47)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
Element 13: Gate 2 Criteria Evidence Assessment (see pages 26-27, 47-48)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
Element 14: Gate 2 Offer and Project Site Location Change (see pages 28, 46)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	

	<p>Element 16: Introducing the proposed Connections Network Design Methodology (CNDM) (see pages 29, 53-55)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</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>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</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>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</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 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>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>Click or tap here to enter text.</p>		
<p>7</p>	<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>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>Click or tap here to enter text.</p>		
<p>8</p>	<p>Do you agree that the Gate 1 process should be a mandatory process step, or do you think Gate 1</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	<p>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>Click or tap here to enter text.</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>Click or tap here to enter text.</p>		
10	<p>Please provide your views on the proposed options ((a) to (e) on page 45) to mitigate the risk of requiring a developer to submit their application for planning consent earlier than they would in their development cycle (with the risk this consent could expire and any extension from the Planning Authority is not automatic).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>We are in favour of the following proposed options: a) Forward Looking M1 Milestone takes into account expected decision timelines and validity of such planning consent with the idea that planning does not expire before planning conditions are discharged. b) Consider using the 10% developer spend route that the Low Carbon Contracts Company use for CFD Contracts. d) The M1 Milestone remains backwards looking from the Completion Date if a project's Completion Date is more than X years away. e) Include a rectification period for a developer to resubmit their application for planning (M1) if the permission expires before the Completion Date.</p> <p>We feel strongly that in order for projects to demonstrate they are shovel ready, the milestone should always be measured i.e. there is a set time period forward or backward looking in which a project must meet. We do not agree with point (C).</p>
11	<p>Do you agree that DFTC should be included as part of CMP434? If not, do you</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	<p>believe that the reformed connections process can function without DFTC? Please justify your answer. (see pages 30-34, 51-53)</p>	
<p>We believe it can be excluded, due to the ENA working through this policy with the strategic connections group whilst also being transparent with external stakeholders on the proposed process. The DFTC process has been discussed with working groups throughout this process and is very much in line with TMO4+. However at a later stage as DFTC evolves and its scope covers more than just the forecast i.e. the process for DNOs making a submission to ESO prior to Gate 2, we do believe it should be codified as TMO4+ needs this process to work in order to be successful.</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? (see Pages 9-10, 55)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>We are happy for this to sit outside of the code as long as we have the opportunity along with industry to review the process and where we feel there are opportunity to improve, they are heard and taken on board.</p>		