## 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:** | Robin Prince | |
| **Company name:** | Island Green Power | |
| **Email address:** | Robin.prince@islandgp.com | |
| **Phone number:** | 07899 438928 | |
| **Which best describes your organisation?** | ☐Consumer body  ☐Demand  ☐Distribution Network Operator  ☒Generator  ☐Industry body  ☐Interconnector | ☐Storage  ☐Supplier  ☐System Operator  ☐Transmission Owner  ☐Virtual Lead Party  ☐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:**

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    ☒a ☒b ☐c ☒d |
| | | WACM1    ☐a ☐b ☐c ☐d |
| | | WACM2    ☒a ☒b ☐c ☒d |
| | | WACM3    ☒a ☒b ☐c ☒d |
| | | WACM4    ☒a ☒b ☐c ☒d |
| | | WACM5    ☒a ☐b ☐c ☐d |
| | | WACM6    ☐a ☐b ☐c ☒d |
| | | WACM7    ☒a ☒b ☐c ☒d |
| | | IGP understands the need for change and supports the code modification in general but not in its entirety. |
| 2 | Do you have a preferred proposed solution? | ☐Original<br><br>☐WACM1<br><br>☒WACM2 |

| | | ☐WACM3 |
|---|---|---|
| | | ☐WACM4 |
| | | ☐WACM5 |
| | | ☐WACM6 |
| | | ☐WACM7 |
| | | ☐Baseline |
| | | ☐No preference |
| | | Click or tap here to enter text. |
| 3 | Do you support the proposed implementation approach? | ☒Yes <br><br> ☐No |
| | | Whilst we do not agree with the whole solution of the original proposal, we believe it better facilitates the objective than the current process. We believe WCAM 2 is the most pertinent WACM that should be included along with the original, however WACMs 3, 4 and 7 all have merit to being included within the final solution. |
| 4 | Do you have any other comments? | The primary concern with this proposal is the delay in the implementation of Gate 2 until Q2. Currently, developers in the market are offering enhanced option prices in an attempt to meet the Gate 2 criteria. This delay allows projects that have not been progressing to continue, which will ultimately become less viable due to increased development expenses (DevEX). <br><br> The non-codification of the methodologies is very concerning as this indicates a move away from the open codes governance process. When the codification is completed with industry member in the right way the results have been a more efficient market design. This |

| | | has help keep the UK at the forefront of connections and specifically renewable connections installation.<br><br>We would encourage the Authority not to implement the code modification unless WACM's 2, 3, 4 and 7 are also included. |
|---|---|---|
| 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? | ☒Yes<br><br>☐No |
| | | We are a working group member |