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CUSC Alternative and Workgroup Vote

CMP434: Implementing Connections Reform

Please note: To participate in any votes, Workgroup members need to have attended at least 50% of meetings.

Stage 1 - Alternative Vote

If Workgroup Alternative Requests have been made, vote on whether they should become Workgroup Alternative CUSC Modifications (WACMs).

Stage 2 - Workgroup Vote

2a) Assess the original and WACMs (if there are any) against the CUSC objectives compared to the baseline (the current CUSC).

2b) Vote on which of the options is best.

Terms used in this document

Term	Meaning
Baseline	The current CUSC (if voting for the Baseline, you believe no modification should be made)
Original	The solution which was firstly proposed by the Proposer of the modification
WACM	Workgroup Alternative CUSC Modification (an Alternative Solution which has been developed by the Workgroup)

The applicable CUSC 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.

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Workgroup Vote

Stage 1 – Alternative Vote

Vote on Workgroup Alternative Requests to become Workgroup Alternative CUSC Modifications.

The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.

Should the majority of the Workgroup OR the Chair believe that the potential alternative solution may better facilitate the CUSC objectives than the Original proposal then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative CUSC modification (WACM) and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.

“Y” = Yes

“N” = No

“-“ = Neutral (Stage 2 only)

“Abstain”

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Workgroup Member	Alternative 2 (EDF, Remove capacity outside RLB)	Alternative 3 (EDF, Remove forward planning milestones)	Alternative 4 (ENWL, Clarification of Embedded definition)	Alternative 5 (ENWL, Raising lower embedded threshold)	Alternative 8 (CBS, DNO submission requirement)	Alternative 10 (Point & Sandwich, indication of costs at Gate 1)	Alternative 12 (Point & Sandwich, ringfencing for Community Generators)
Allan Love / Gareth Williams*	Abstain	N	Y	N	N	N	N
Andrew Yates / Rohit Alexander*	Y	Y	Y	Y	Y	Y	Abstain
Andy Dekany	Y	Y	Abstain	Abstain	Abstain	N	N
Ben Adamson / Ed Birkett*	N	N	Abstain	Abstain	Y	N	N*
Bill Scott	N	N	N	N	N	N	NIA
Brian Hoy	N	N	Y	Y	N	N	N
Callum Dell	NIA	NIA	NIA	NIA	NIA	NIA	NIA
Ciaran Fitzgerald / Morgan Joyce*	Y	N	N	N	Y	Y	N*
Claire Hynes	N	Y	Y	Y	Y	Y	N
Fereshteh Nouri / Hooman Andami*	N	N	Y	N	Y	Abstain	N*
Garth Graham	Y	Y	N	N	Y	Y	N
Grant Rogers	N	N	Y	Y	Y	N	N

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Greg Stevenson	N	N	N	N	N	N	Y
Helen Snodin / Charles Yates*	N	N	Abstain	Abstain	Y	Y	N
Helen Stack	N	N	Y	Y	Y	Abstain	Abstain
Hugh Morgan	Abstain	N	Y	N	N	N	N
James Jackson	N	Y	Y	N	Y	N	NIA
Joe Colebrook	N	N	Y	Y	Y	N	N
Kyran Hanks	NIA	NIA	NIA	NIA	NIA	NIA	N
Laura Henry	N	N	N	N	N	N	N
Luke Scott / Nirmalya Biswas*	N	N	Abstain	Abstain	N	Abstain	N*
Mark Field	N	Abstain	Y	Y	Abstain	N	NIA
Michelle MacDonald Sandison / Ross O'Hare*	N	N	Y	Y	N	Y	Y*
Mireia Barenys	NIA	NIA	NIA	NIA	NIA	NIA	Abstain
Mohammad Bilal	N	Abstain	N	Y	N	N	N
Paul Jones	N	N	Y	Y	Y	Y	N
Paul Youngman	Abstain	Y	Y	Abstain	Abstain	Abstain	N
Phillip Addison	Y	Y	N	N	N	N	NIA
Ravinder Shan	N	N	Y	Y	Y	N	N
Richard Woodward	N	N	N	N	N	N	N



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Rob Smith	Y	N	Y	Abstain	Y	Y	N
Ruby Pelling	N	N	N	N	N	N	N
Sam Aitchison	N	Y	N	Y	Y	N	N
Simon Lord	I	I	I	I	I	I	N
Wendy Mantle / Claire Witty*	Abstain	N	Y	N	N	N	N
Zygimantas Rimkus	Abstain	Abstain	Abstain	Abstain	Abstain	Y	N
WACM?	-	-	WACM1	-	WACM2	-	-
Date of Vote	25/09/24	25/09/24	25/09/24	25/09/24	25/09/24	25/09/24	30/09/24



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Workgroup Member	Alternative 13 (Low Carbon, Capacity reallocation codification)	Alternative 14 (Low Carbon, codify changes to RLB)	Alternative 17 (Q-Energy, Alternative to Element 18)	Alternative 19 (Innova, Remove Element 9: Project Designation)	Alternative 21 (Epsilon, 12 months to move RLB post Gate 2)	Alternative 25 (RWE, Codify methodologies and guidance)	Alternative 26 (SSE, single process for new and existing projects)
Allan Love / Gareth Williams*	N	N	N	N	Abstain	N	N
Andrew Yates / Rohit Alexander*	Y	N	Y	N	Y	Abstain	Y
Andy Dekany	N	N	Abstain	N	N	N	Abstain
Ben Adamson / Ed Birkett*	Y	Y	Abstain	Y	N*	Y	Abstain
Bill Scott	Y	Y	N	N	NIA	Y	Y
Brian Hoy	Y	Y	N	Y	N	Y	N
Callum Dell	NIA	NIA	NIA	NIA	NIA	NIA	NIA
Ciaran Fitzgerald / Morgan Joyce*	Y	Y	N	Y	N*	Y	Y
Claire Hynes	Y	N	Y	Y	N	Y	Y
Fereshteh Nouri / Hooman Andami*	Y	Y	Y	Y	N*	Y	Abstain
Garth Graham	Y	Y	Y	N	Y	Y	Y
Grant Rogers	Y	Y	Y	Y	N	Y	N



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Greg Stevenson	N	N	Y	N	N	N	N
Helen Snodin / Charles Yates*	N	Y	Abstain	N	N	Y	N
Helen Stack	Abstain	Y	Y	Y	N	Y	Abstain
Hugh Morgan	Y	N	Y	N	N	N	Abstain
James Jackson	Y	N	N	Y	NIA	Y	N
Joe Colebrook	Y	Y	Y	Y	N	Y	Abstain
Kyran Hanks	NIA	NIA	NIA	NIA	Y	NIA	NIA
Laura Henry	N	N	N	N	N	N	N
Luke Scott / Nirmalya Biswas*	N	N	N	N	N*	N	N
Mark Field	Y	Y	Y	Abstain	NIA	Y	Y
Michelle MacDonald Sandison / Ross O'Hare*	N	N	N	Y	N*	N	N
Mireia Barenys	NIA	NIA	NIA	NIA	Abstain	NIA	NIA
Mohammad Bilal	N	N	N	Abstain	N	N	N
Paul Jones	N	Y	Y	N	N	Abstain	N
Paul Youngman	Y	Y	Abstain	Y	N	Y	Y
Phillip Addison	Y	Y	N	Y	NIA	Y	N
Ravinder Shan	Y	Y	N	Y	N	Y	N
Richard Woodward	N	Abstain	N	N	N	N	N



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Rob Smith	Y	Y	Y	Y	N	Y	Y
Ruby Pelling	N	N	N	N	N	N	N
Sam Aitchison	Y	Y	Y	Y	N	Y	Y
Simon Lord	I	I	I	I	N	I	I
Wendy Mantle / Claire Witty*	N	N	N	N	Abstain	N	N
Zygimantas Rimkus	Y	Abstain	Abstain	Abstain	N	Y	Abstain
WACM?	WACM3	WACM4	-	WACM5	-	WACM6	-
Date of Vote	25/09/24	25/09/24	25/09/24	25/09/24	30/09/24	25/09/24	25/09/24



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Workgroup Member	Alternative 27 (Muir Mhòr, planning submission or security required for Gate 2)	Alternative 28 (Enso, greater visibility of competitor projects)	Alternative 29 (ENWL, Combination of WACM1 and WACM6)	Alternative 31 (Innova, Combination of WACM1 and WACM4)	Alternative 32 (Innova, Combination of WACM1, WACM3 and WACM4)
Allan Love / Gareth Williams*	Abstain	N	N*	N*	N*
Andrew Yates / Rohit Alexander*	Y	Y	N*	N*	N*
Andy Dekany	Y	N	N	N	N
Ben Adamson / Ed Birkett*	Abstain*	Abstain	NIA	NIA	NIA
Bill Scott	NIA	Y	N	N	N
Brian Hoy	N	N	Y	Y	Y
Callum Dell	NIA	NIA	I	I	I
Ciaran Fitzgerald / Morgan Joyce*	N*	Y	N	N	N
Claire Hynes	N	Y	Y	Y	Y
Fereshteh Nouri / Hooman Andami*	N*	Y	NIA	NIA	NIA
Garth Graham	N	Y	N	N	N
Grant Rogers	Abstain	Y	N	N	N



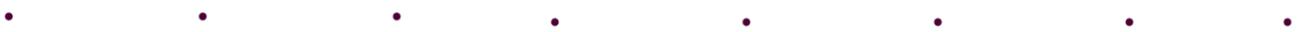
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Greg Stevenson	N	N	N	N	N
Helen Snodin / Charles Yates*	Y	Y	Y*	Y*	N*
Helen Stack	Y	Abstain	Y	N	N
Hugh Morgan	Abstain	Abstain	Y	Y	N
James Jackson	NIA	Y	NIA	NIA	NIA
Joe Colebrook	N	Y	N	Y	Y
Kyran Hanks	Y	NIA	NIA	NIA	NIA
Laura Henry	N	N	Abstain	Abstain	Abstain
Luke Scott / Nirmalya Biswas*	N*	N	Y	Y	Y
Mark Field	NIA	Y	N	N	N
Michelle MacDonald Sandison / Ross O'Hare*	N*	N	N*	N*	N*
Mireia Barenys	Abstain	NIA	NIA	NIA	NIA
Mohammad Bilal	N	Abstain	N	N	N
Paul Jones	Y	Y	N	Y	Y
Paul Youngman	Y	Y	N	Y	Y
Phillip Addison	NIA	N	NIA	NIA	NIA
Ravinder Shan	Y	N	NIA	NIA	NIA
Richard Woodward	Abstain	Y	N	N	N



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Rob Smith	Y	Y	Y	Y	Y
Ruby Pelling	N	Y	N	N	N
Sam Aitchison	N	Y	N	N	N
Simon Lord	Y	I	I	I	I
Wendy Mantle / Claire Witty*	Abstain	N	N*	Y*	Y*
Zygimantas Rimkus	Abstain	Y	NIA	NIA	NIA
WACM?	-	WACM7	-	-	-
Date of Vote	30/09/24	25/09/24	30/10/24	30/10/24	30/10/24



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Stage 2a – Assessment against objectives

To assess the original and WACMs against the CUSC objectives compared to the baseline (the current CUSC).

You will also be asked to provide a statement to be added to the Workgroup Report alongside your vote to assist the reader in understanding the rationale for your vote.

ACO = Applicable CUSC Objective

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Allan Love – Scottish Power Transmission					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Yes	Yes	Neutral	No	No
WACM3	Yes	Yes	Neutral	Neutral	Yes
WACM4	No	Yes	Neutral	No	Yes
WACM5	No	No	Neutral	No	No
WACM6	Yes	Yes	Neutral	No	No
WACM7	Yes	Yes	Neutral	No	No

Voting Statement:

I believe both the Original and WACM1 (subject to finalisation of the legal text) best meets the applicable CUSC objectives.

The proposal only facilitates the introduction of the gated process by CMP434, which is required to raise barriers to entry and increase coordination within the network design process. However, most consequential changes sit within the Methodologies.

I am concerned that the revised timetable provided was insufficient to allow for a thorough review of the legal text. Consequently, I reserve the right to raise questions and seek clarification regarding the text in future.

Our reasoning is as follows:

Objective A

Positive: The proposal will introduce a gated process, with a batched network design, that will allow projects to be prioritised based on readiness. This will facilitate the design

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of a more coordinated system and potentially free up network capacity for projects proven to be progressing helping to deliver Clean Power 2030 and Net Zero ambitions.

WACM 4, Negative: This requirement risks limiting the flexibility facilitated by the Methodologies, particularly in the initial years of TMO4+.

WACM 5, Negative: Project Designation when applied to Security of Supply, system operation and the reduction of system/network constraints is required for the development of an efficient, economic and coordinated system at pace to meet Net Zero.

Objective B

Positive: This proposal introduces the architecture for the reformed connections process, with the aspects which will have most impact on competition largely sitting outside the code within the Methodologies. The proposal contributes to facilitating effective competition through the introduction of the gated process.

WACM 5, Negative: Project Designation when applied to Security of Supply, system operation and the reduction of system/network constraints is required for the development of an efficiency, economic and coordinated system at pace to meet Net Zero.

Objective C

Neutral: Industry participants already comply with the relevant legislation and will continue to do so.

Objective D

Positive: The introduction of a gated process, with a batched network design, will facilitate the allocation of capacity to those projects most ready to proceed and should generate efficiencies in the identification of shared connection assets. Higher barriers to entry will allow network operators to focus on projects most ready to proceed. A move from a continuous to batched application and offer process will necessitate the development of further efficiencies in the NESO and Networks organisations.

WACM 2, Negative: The requirement for all, rather than 'best endeavours', places an unrealistic expectation on DNOs to submit late and/or complex applications within the window.

WACM 4, Negative: This requirement risks limiting the flexibility facilitated by the Methodologies, particularly in the initial years of TMO4+.

WACM 5, Negative: Project Designation when applied to Security of Supply, system operation and the reduction of system/network constraints is required for the development of an efficiency, economic and coordinated system at pace to meet Net Zero.

WACM 6, Negative: The NESO is already expected to have the obligation within its Licence to review and consult on the Methodologies annually. At which point any party

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can raise a code modification under open governance. The proposed additional review is unnecessary.

WACM 7, Negative: Under TMO4+ the NESO will already commit to publish the outcome of each application window and additional information on projects not in the queue (e.g. Gate 1). In addition, information on other parties' connection location and planning status is available through NESO registers and Land and Planning registers. Parties should take a decision to apply prior to the window and not tie up NESO and TO resources during the application window.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Andy Dekany - NGV					
Original	Yes	Neutral	Neutral	Yes	Yes
WACM1	Yes	Neutral	Neutral	Yes	Yes
WACM2	Yes	Neutral	Neutral	Yes	Yes
WACM3	Neutral	Neutral	Neutral	Neutral	Yes
WACM4	Neutral	Neutral	Neutral	Yes	Yes
WACM5	Neutral	Neutral	Neutral	Neutral	Yes
WACM6	Yes	Neutral	Neutral	Yes	Yes
WACM7	Yes	Neutral	Neutral	Yes	Yes

Voting Statement:

I believe the Connections process within the current Baseline is in need of significant reform, and appreciate the considerable efforts made by NESO to address a very wide range of differing perspectives. I consider that the Original proposal does better facilitate the Applicable CUSC Objectives since it should improve co-ordinated network design in harmony with strategic network design, and the introduction of batched processes has the potential to lead to more efficient administration and allocation of capacity. However, I have some reservations:

- a) The Original includes a gated process designed around 'Land Rights' (which is not uniformly suitable as a measure of project progress/status);
- b) The final package (CMP434, associated Methodologies, plus potential financial instruments) is not being assessed by the Workgroup, so it must be assumed that some key areas will be adequately addressed (e.g. that the Methodologies provide

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- a clear pathway for projects relying upon compulsory purchase powers, and ensuring those projects are allocated a fair queue position);
- c) An inbuilt reliance upon NESO to correctly assess large complex projects developed over extended timeframes (e.g. decisions regarding Connection Point and Capacity Reservation, and associated bilateral discussions around the Gate 1 Expiry Date within the ‘conditional clause’).

As a result of the size and scope of these changes (plus the various reservations), it is assumed that the process will be followed up by further refinement alongside regular Consultations regarding the success and impact of the changes.

I assess WACM3, WACM4, and WACM5 to negatively affect (verses the Original) the efficient discharge by the Licensee of their obligations, and all WACMs negatively affect (verses the Original) the efficiency of administration of the CUSC, most significantly WACM3 and WACM5. Whilst I have assessed all WACMs to be improvement upon the Baseline, this is only due to the relatively small difference compared to the significant overall scope of the Original; I believe that WACM3 and WACM5 carry a potential to significantly undermine future strategic network planning facilitated through the Original, and WACM6 is setting a future direction that does not need to be decided at this point.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Anthony Cotton - Green Generation Energy Networks Cymru Ltd					
Original	No	No	No	No	No
WACM1	No	No	No	No	No
WACM2	No	No	No	No	No
WACM3	No	No	No	No	No
WACM4	No	No	No	No	No
WACM5	No	No	No	No	No
WACM6	No	No	No	No	No
WACM7	No	No	No	No	No

Voting Statement:

Whilst I support in principle changes to the connections process and reform of the queue, and fully support the achievement of Clean Power 2030 and the Net Zero ambition, I do not see how the Original or any of the Alternative modifications to the Code meets the objectives. This is principally because the key changes of substance are in the

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Methodologies which are not codified in the CUSC, rather the change being voted on would confirm this in the CUSC. Whilst such a change may be expeditious for future development of the arrangements, and the key features of the Gate 2 Methodology were raised in the working group, other than this, members of the Working Group have had no opportunity to review, discuss or challenge the NESO on the Methodologies. Similarly, there has been little detailed debate on how the new arrangements will impact embedded generation. The revised legal text changes the way certain embedded projects should be processed and given the speed with which this have been drafted and with limited workgroup debate, there is a clear risk of errors or unintended consequences. More generally I consider that there are serious risks to the investment climate for new projects seeking to connect to and use the Transmission System and there has been no quantitative assessment of the costs, benefits and risks associated with this change (at least none that has been shared with or discussed by the workgroup).

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Ben Adamson - Low Carbon					
Original	Neutral	Neutral	Neutral	Neutral	No
WACM1	Neutral	Neutral	Neutral	Neutral	No
WACM2	Neutral	Neutral	Neutral	Neutral	No
WACM3	Yes	Yes	Yes	Yes	Yes
WACM4	Yes	Yes	Yes	Yes	Yes
WACM5	Neutral	Neutral	Neutral	Neutral	No
WACM6	Neutral	Neutral	Neutral	Neutral	Yes
WACM7	Neutral	Neutral	Neutral	Neutral	No
Voting Statement:					
No voting statement provided.					

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Bill Scott - Eclipse Power Networks					
Original	Yes	Yes	Neutral	Yes	Yes

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WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Yes	Yes	Neutral	No	Yes
WACM4	Yes	Yes	Neutral	No	Yes
WACM5	Yes	Yes	Neutral	No	Yes
WACM6	Yes	Yes	Neutral	No	Yes
WACM7	Yes	Yes	Neutral	Yes	Yes

Voting Statement:

I agree that the impact of the CMP434 Original Proposal is Positive on ACOs a), b) and d), and is Neutral regarding ACO c). I believe that WACMs 1, 2 and 7 add further clarity and benefit to the OP, but that no individual WACM exceeds the OP. Whilst being sympathetic with the ambitions of WACMs 3, 4, 5 and 6 to limit the impact of the new Methodologies, I accept that Methodologies will likely be the way forward in the future as the connections market increases in speed and complexity, and will promote greater efficiency per ACO (d). I will accordingly now focus on providing appropriate input to the consultations for these new Methodologies to ensure adequate scrutiny and governance is incorporated into the way they will be implemented and managed.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Brian Hoy - Electricity North West					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Yes	Yes	Neutral	No	Yes
WACM3	Yes	Yes	Neutral	Yes	Yes
WACM4	Yes	Yes	Neutral	Yes	Yes
WACM5	Yes	Yes	Neutral	Yes	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes
WACM7	Yes	Yes	Neutral	No	Yes
Voting Statement:					

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ACO (a) Application windows lead to a more co-ordinated approach to network assessment which supports the development of efficient, economic and co-ordinated network in line with obligations.

ACO (b) All support facilitating competition by ensure most ready projects can progress and are not delayed by other projects not progressing.

ACO (c) All are neutral against this.

ACO (d) Generally most support this apart from WACM 2 which imposes disproportionate obligations on DNOs over the new obligation introduced in the baseline and WACM 7 which introduces a delay to the process with little benefit for new projects.

Overall WACM 1 is best as it has the features of the proposers but add simplicity, clarity and independence of the criteria that are applied to embedded projects.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Charles Yates - Fred Olsen Seawind					
Original	No	No	No	No	No
WACM1	Yes	Yes	Yes	Yes	Yes
WACM2	Yes	Yes	Yes	Yes	Yes
WACM3	Yes	Yes	Yes	Yes	Yes
WACM4	Yes	Yes	Yes	Yes	Yes
WACM5	Neutral	Neutral	Neutral	Neutral	No
WACM6	Yes	Yes	Yes	Yes	Yes
WACM7	Yes	Yes	Yes	Yes	Yes

Voting Statement:

The applicable CUSC objectives are best meet by clear, simple, transparent CUSC rules with limited discretion for NESO to make exceptions.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Ciaran Fitzgerald - Scottish Power Renewables					

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Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Neutral	Yes	Neutral	No	No
WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Yes	Yes	Neutral	Yes	Yes
WACM4	Yes	Yes	Neutral	Yes	Yes
WACM5	Yes	Yes	Neutral	Yes	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes
WACM7	Yes	Yes	Neutral	Yes	Yes

Voting Statement:

In my view, the original proposal provides a viable solution to address the defect and is an improvement on the baseline. I recognize the need for significant change to the connections process and believe that the original proposal provides an appropriate structure, which can facilitate the further changes required to achieve the ultimate aims of TMO4+. As has been discussed by workgroup members during the workgroup meetings and in the report, it should be highlighted that the detailed processes and procedures that will sit within the new structure will be housed within the methodologies, and as such are not being assessed as part of this consultation.

WACM1 - I recognize the intention behind the WACM and support the desire to provide a clarity to Users. However, I have noted the challenges experienced during the workgroup’s attempts to provide satisfactory legal text to facilitate this change. I also have concerns over the implications of this change to other sections of the code and the requirements for further changes that would be required as a result in this WACM.

WACM2 – I believe this facilitates better competition and ensures efficiency, fairness, and transparency by ensuring that embedded users are not disadvantaged relative to transmission connected users.

WACM3 - I support that codifying this process will demonstrate fairness and transparency for all users, which will facilitate competition and reassure investors that all viable projects are given fair and equal opportunity to progress to connection, as far as is practical.

WACM4 –I support this proposal in that it provides clarity and detail to the outcomes of the red line boundary constraints. This ensures all users will understand the implications of introducing this constraint and should ensure that all users are treated equally in respect of any changes being made to the red line boundary. The clarification of treatment of staged and hybrid connections ensures viable technologies within these agreements will have the opportunity of progress where appropriate.

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WACM5 –I support this proposal as it would further ensure fairness, transparency and equal project of all users and remove the potential for legal challenges against NESO resulting from the outcome of the designation process.

WACM6 –I support this proposal as I believe it is an appropriate compromise to the disagreements held during the workgroup over whether the methodologies should be put into code. This proposal allows the NESO to progress with reform and realise the benefits, whilst ensuring that the methodologies are subject to appropriate consultation and scrutiny within a defined time period, and also allow for an initial impact assessment to be considered during that process.

WACM7–I support this proposal, primarily for its benefits within the 435 process. I believe this proposal will benefit users in ensuring transparency of the potential queue and allow users to make more informed investment decisions. It will also minimize wasted efforts by NESO and the network businesses by facilitating the reduction of the queue at an earlier stage, and prior to the gated design process.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Claire Hynes - RWE Renewables					
Original	Yes	Neutral	Neutral	Yes	Yes
WACM1	Yes	Neutral	Neutral	Yes	Yes
WACM2	Yes	Neutral	No	Yes	Yes
WACM3	Yes	Yes	Neutral	Yes	Yes
WACM4	Yes	No	Neutral	Neutral	No
WACM5	Yes	Yes	Neutral	Neutral	Yes
WACM6	Yes	Neutral	Neutral	Yes	Yes
WACM7	Yes	Neutral	Neutral	Yes	Yes

Voting Statement:

The ‘first come, first served’ connection process approach has needed to be reformed to address the needs of a wider variety of technology connecting to the grid for some time. The new transmission connection process batches projects in a co-ordinated network design that links to strategic planning. This new approach should lead to more reliable signals for future investment which will help to ensure that the transmission works are delivered more efficiently in line with Objective (a). The barriers introduced to remove

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speculative projects from the connection queue should lead to a more efficient administration of the CUSC arrangements under Objective (D).

Our overall preference is WACM 6 which simplifies the new transmission connection process by ensuring the obligations linked to the final version of the guidance documents and methodologies are reviewed and formally recommended by experts in the CUSC Modification Panel for the appropriate documents to be codified at a future date. This will ensure that the appropriate connection reform documentation is held under one code for simplicity and provide new market entrants with the support of an open governance framework throughout every aspect of the connection process, thus promoting the efficiency in the implementation and administration of the CUSC arrangements.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Garth Graham - SSE Generation					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	No	No	No	No	No
WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Yes	Yes	Neutral	Yes	Yes
WACM4	Yes	Yes	Neutral	Yes	Yes
WACM5	Yes	Yes	Neutral	Yes	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes
WACM7	Yes	Yes	Neutral	Yes	Yes

Voting Statement:

Before assessing the eight options (the Original and seven WACMs) I wish to make the following general observations, which pertain to the Original. However, as all seven WACMs are based upon the Original (with either additions or subtractions) these general observations are also relevant to all seven WACMs as well.

Legal conformance - I am mindful that significant aspects of the totality of the changes, to the terms and conditions for connection (at transmission and distribution) are, it is intended (by the NESO) to be contained within the three proposed new methodologies (as listed, in the proposer's part of the Workgroup report).

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As I noted to the Workgroup at some of the initial meetings, there is a requirement to be mindful of the legal framework within which the CUSC and the NESO Transmission Licence and, in particular the Third Package and the European Network Codes.

Suffice to say I have concerns, as to the possible legal uncertainty of the proposed approach, especially with respect to the housing of terms and conditions for connecting parties (primarily generation, demand and interconnectors) within the methodologies; comes from this perspective of this background. In this respect I also note the wording in the third paragraph of the CMP435 Workgroup report draft issued on 1st November, starting “The legal enforceability...”, and especially the statement, in the last sentence that “parties are contractually obligated to ...comply with the Methodologies”. I am not certain, within the wider European Network Codes framework, that this is legally correct.

Accordingly, in respect of my ‘Best’ vote, WACM5, by removing the NESO Project Designation approach will (of all the options) be more legally robust, whilst WACM1 (which does not ensure harmonisation) will not.

Transparency - On numerous occasions during the Workgroup meeting I have flagged up opportunities for the Proposer to amend their original solution to ensure transparency to, in particular, parties seeking to connect to the transmission and distribution systems in GB.

RfG Article 7 (3) (b) “When applying this Regulation, [F47the regulatory authority] and system operators shall: ...(b) ensure transparency” [emphasis added]

[this wording is from the updated version, post Brexit, on the UK Legislation website, where the regulatory authority is GEMA]

In addition to this legal obligation, in terms of transparency, I am also mindful that the UK Government and Ofgem established the Energy Data Taskforce. I flagged up the Taskforce work during numerous Workgroup meetings, and that “*The government and Ofgem have endorsed the [Energy Data Taskforce’s](#) recommendations.*” [Modernising Energy Data - GOV.UK](#)

In this respect, as noted in the Introduction to the Taskforce report:

“At the core of the Taskforce recommendations are the principles that the sector should be Digitalising the Energy System and that in order to maximise value, Energy System Data should be Presumed Open” [emphasis added]

As the Energy Minister noted, in the Forward to the Taskforce report:

“Data is fundamental to the future of our economy, which is why it is the focus of one of the Grand Challenges in our Modern Industrial Strategy. In the power sector, it is the key to unlocking system and consumer benefits and managing the fast-approaching challenges of flexibility, resilience and costs in the most efficient way” [emphasis added]

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In terms of the types of data that the NESO has access to, the Taskforce noted that:

“Energy System Data that has value to the wider system and has been generated by monopoly or consumer subsidy should be available for the benefit of the ‘system as a whole’.” [emphasis added]

In summary the Taskforce identified many benefits from data transparency,), examples of which include:

(i) *Improving operation of the system*, (ii) *Optimising operation of the system*, (iii) *Optimising across energy vectors* (iv) *Unlocking the flexibility market* [which given the NESO’s ‘High Renewables / High Flexibility’ pathway, for CP30 purposes, may be of particular relevance to CMP434/CMP435?], (v) *Enabling clarity across the multiple actors in the system*, (vi) *Securing the new Energy System*, (vii) *Regulatory oversight and risk assessment*, (viii) *Optimising procurement and cost reduction*, (x) *Opening the system to new markets and better price discovery*, (xi) *Data visibility creates opportunity for all*, and (xii) *Attracting new players to the sector*.

The Taskforce helpful also identified the detrimental effect of following the NESO’s approach (of not publishing the items identified in the CMP434 and CMP435 discussions) examples of which include:

(a) *Slower more expensive transformation*, (b) *Fragmented datasets reducing efficiency*, (c) *Increased risk to system stability*, and (d) *Reduced innovation*.

The negative effects, from a lack of energy data transparency, was summarised by the Taskforce, in the following terms:

“The value of data is not being maximised: innovation is being stifled, the system is less efficient, and the consumer is worse off”

In light of the above, it is beyond contestation that the publication of information (held, or produced, by the NESO as a result of its actions arising from CMP434 / CM095 and CMP435) results in a better network outcome and lower costs to consumers. Accordingly, it is disappointing that the NESO, as proposer of CMP434 / CM095 and CMP435 has been unable to maximise transparency of all this connections related information arising from these Modifications.

WACM1

My primary concern, with WACM1; which I did outline to the Workgroup on several occasions; relates to the requirement, as set out, for example, in Recital (3) of RfG concerning harmonisation:

*“Harmonised rules for grid connection for power-generating modules should be set out in order to provide a clear legal framework for grid connections, facilitate Union-wide trade in electricity, ensure system security, facilitate the integration of **renewable electricity***

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sources, increase competition and allow more efficient use of the network and resources, for the benefit of consumers.”

Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a network code on requirements for grid connection of generators (Text with EEA relevance)

This principle is then reflected in the rest of the RfG (plus the DCC and HVDC) concerning the statutory framework for the connection of generation (plus demand, interconnectors and offshore windfarms) to the electricity transmission and distribution system.

However, WACM1 introducing as it does the 'Category 1' approach; with different levels, for generators, across the three onshore TO areas within GB; does not address the need for harmonised rules for grid connection of generation - rather it seeks the opposite. As such this is incompatible with the legal requirement - so cannot be said to better facilitate Applicable Objective (c).

As a consequence of not being harmonised, it therefore follows that WACM1 will not “ensure system security, facilitate the integration of renewable electricity sources, increase competition and allow more efficient use of the network and resources, for the benefit of consumers”.

As a result, therefore, in my view, WACM1 does not better facilitate the efficient discharging of the obligations in the Act and the Transmission Licence - so cannot be said to better facilitate Applicable Objective (a). Therefore, neither can it be said to facilitate efficient competition - so cannot be said to better facilitate Applicable Objective (b).

Finally, as a consequence of its legal incompatibility, then WACM1 could not promote efficiency in the implementation and administration of the CUSC - so cannot be said to better facilitate Applicable Objective (d).

In addition to this primary (harmonisation) concern, I have other concerns, in terms of the legality of WACM1 (in the Third Package and European Network Codes context of the terms and conditions for connect) which, for the sake of brevity, I refrain from setting out here. These other concerns enhance, in my view, the (lack) of better facilitating all of the Applicable Objectives for WACM1.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
	Grant Rogers - Qualitas Energy				
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Neutral	Neutral	Yes	Yes

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WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Yes	Yes	Yes	Yes	Yes
WACM4	Yes	Yes	Neutral	Yes	Yes
WACM5	Yes	Yes	Neutral	Neutral	Yes
WACM6	Yes	Yes	Yes	Yes	Yes
WACM7	Yes	Yes	Neutral	Yes	Yes

Voting Statement:

No voting statement provided.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Greg Stevenson - SSEN Transmission					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	No	No	Neutral	Yes	No
WACM2	No	No	No	Yes	No
WACM3	No	Yes	No	Yes	No
WACM4	No	No	Neutral	No	No
WACM5	No	No	Neutral	No	No
WACM6	No	No	No	Yes	No
WACM7	No	Yes	No	Yes	No

Voting Statement:

I believe that the Original better facilitates the Applicable Objectives and is a huge step forward for the industry in future proofing the connections process. The current connections process is not fit for purpose as is evidenced through the current size of the queue. This proposal, if approved will help contribute to the achievement of Net Zero targets set by the Scottish and UK Governments.

Objective A

I agree that the Original Proposal better facilitates Objective A. I support the move to a gated connections process that will prioritise projects that are needed, ready and viable for connection to the National Electricity System (NETS). With the move to a strategic

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planning focus first through alignment with Clean Power 2030 and then the Strategic Spatial Energy Plan (SSEP) customers projects should receive earlier connection dates and will no longer be stuck behind projects that may ultimately never connect.

Objective B

The Original will facilitate effective competition by implementing a process that will prioritise customers who are needed to and ready to connect, they can be accelerated through the process quicker than under the current baseline approach. Connection dates and locations will be allocated to Gate 2 projects that have met all the relevant Gate 2 criteria which ensures they are more viable.

Objective C

Neutral

Objective D

I believe that this proposal will help promote efficiency in the implementation and administration of CUSC arrangement. The move to a batched assessment process will allow for improved coordinated network designs which will ultimately help shape & improve investment plans for network operators as there will be greater certainty in the connection offers being provided by each company.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
	Helen Stack - Centrica				
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Yes	Yes	Neutral	Yes	Yes
WACM4	Yes	Yes	Neutral	Yes	Yes
WACM5	Yes	Yes	Neutral	Yes	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes
WACM7	Yes	Yes	Neutral	Yes	Yes

Voting Statement:

I believe that the Original and all WACMs better facilitate CUSC objectives a), b) and d) compared to the Baseline. In the face of an exponential rise in connection applications

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the Baseline no longer provides an effective solution, meaning there is a need for radical and urgent reform.

The Original and all WACMs better meet objectives a) and d) by ensuring only viable projects that are ready to progress, and are needed, pass Gate 2 (subject to Ofgem's approval of the linked NESO Methodology documents and licence conditions). In combination with 'batching', this has the potential to allow the Licensee to provide faster and more cost-efficient connection of generation assets, compared with the current situation.

The Original and all WACMs also better meet objective b), given that the Baseline is effectively 'broken' and is not allowing new generation projects to enter the market in a timely manner. I remain concerned that the Original and all WACMs fail to address issues at the transmission-distribution interface that can disadvantage embedded generation relative to directly connecting projects. This is because these issues were not included in the final scope of CMP434.

I believe that WACM2 best meets the applicable CUSC objectives. WACM2 better facilitates CUSC objective b) by mitigating for the risks small and medium embedded generation faces in having to rely on the DNO/iDNO to submit projects' Gate 2 evidence on time. The consequences of the DNO/iDNO failing to submit customers' Gate 2 evidence as part of a fully completed Gate 2 Application have increased with the reduction in the number of Gate 2 windows per year to only two. WACM2 helps to level the playing field for embedded generation relative to transmission connecting projects. Of all the WACMs, we believe that this is the most needed for go-live.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
	Jack Purchase - NGED				
Original	Yes	Yes	Yes	Yes	Yes
WACM1	Neutral	Neutral	Neutral	Neutral	No
WACM2	No	No	No	No	No
WACM3	No	No	No	No	No
WACM4	No	No	No	No	No
WACM5	No	No	No	No	No
WACM6	No	No	No	No	No
WACM7	No	No	No	No	No

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Voting Statement:

NGED supports the original proposal. NGED cannot support WACM2 as it does not align with the timescales that DNO's will need to adhere to as part of the original.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
James Jackson - Orsted					
Original	No	No	Neutral	No	No
WACM1	No	No	Neutral	No	No
WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Neutral	Yes	Neutral	Yes	Yes
WACM4	No	No	Neutral	No	No
WACM5	Neutral	Yes	Neutral	Neutral	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes
WACM7	Neutral	Yes	Neutral	Neutral	Yes

Voting Statement:

In summary, although some proposals could improve upon the baseline, it's very difficult to make a qualified assessment against the objectives because multiple (critical) elements have been descoped into methodology and guidance documents. The detail these methodologies hold can fundamentally change project development risk levels. There remains an outstanding concern that modifications could be made relatively easily or unilaterally, leading to knock-on impacts to investor confidence.

In addition, I have concerns relating to the Original Proposal (as well as WACMs 1 and 4) and their ability to better facilitate Applicable Objective (b). Owing to a large number of interactions with other workstreams (for example Data Provision, Gate 2 Criteria Methodology, Allowable Changes and ENA-led work) and a reliance on those workstreams for successful implementation, there is a risk that Original Proposal may be detrimental to the delivery of Nationally Significant Infrastructure Projects, when compared to the status quo. This could lead to greater distortions between distribution and transmission customers, decrease investor confidence resulting in higher costs to projects, and ultimately lead to higher costs to consumers.

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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Joe Colebrook - Innova Renewables					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Yes	Yes	Neutral	Yes	Yes
WACM4	Yes	Yes	Neutral	Yes	Yes
WACM5	Yes	Yes	Neutral	Yes	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes
WACM7	Yes	Yes	Neutral	Yes	Yes

Voting Statement:

I agree that the Original is better than the Baseline and is positive for Objectives a), b) and d). However, the ability to understand the full impact of the CUSC modification has been made difficult due to the lack of visibility of the Three Methodologies the NESO is proposing to introduce. I will engage fully with the consultation on the Methodologies which should mitigate many of my concerns. It has been confirmed that the Authority will consider CMP434 together with the final Methodologies which should ensure any misalignment is fully considered.

Objective a) - Introduces an application based and gated connections process that is able to prioritise readier and/or more viable projects enabling the industry to help the government to meet its net zero targets and is future proofed to support more strategic network planning activities. Currently, project developers are waiting too long to connect, and this is hindering progress to deliver net zero. Application windows allow a more coordinated network design closely aligned with NESO’s current and future strategic planning activities and that facilitate anticipatory investment to ensure transmission works are delivered efficiently.

Objective b) - Introduces an application based and gated connections process that is able to prioritise readier and/or more viable projects. The changes proposed in the Original should increase the number of generators connecting each year and bring forward the connection of many viable projects. The Original should clarify the Transmission connections process and connection rules, providing certainty to the industry to allow investment. There is a risk that the implementation timeline pauses investment in projects for 12 months which could reduce the competitiveness of electricity supply in the short term. These changes will improve competitiveness of generation and supply of electricity.

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Objective c) I am not aware of any impact on compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.

Objective d) The new process also provides CUSC Parties, including network companies, with greater structure and ability to plan through only providing full/confirmed offers to readier and more viable projects. Fewer industry resources will be invested into facilitating connections for projects which will not be built.

For the reasons outlined above I believe all the WACMs will be better than the Baseline and be positive for objectives a) b) and d), although I have provided:

WACM1 - this WACM will clarify a part of the connections process which causes significant confusion in the industry and therefore I believe WACM1 is better than the Original.

WACM2 - I believe WACM2 puts obligations on Distribution Network Operators related to third parties to the CUSC (Relevant Small and Medium Embedded Generators). I agree with the need for the obligations, but it is my view that the CUSC is not the appropriate place for these obligations and instead the obligations should be introduced via a DCUSA Modification or changes to the Distribution Licence. Therefore, I believe WACM2 is not better than the Original.

WACM3 - The Capacity Reallocation rules proposed by WACM3 are likely to contradict the Three Methodologies being implemented by the NESO. The consultation on the Methodologies is planned to happen after this vote. Without a finalised Methodologies I do not feel it is possible to confirm if this WACM is better than the Original. In the absence of the Methodologies, I believe WACM3 provides clarity for CUSC Parties which is currently lacking, and therefore is better than the Original.

WACM4 - The % of installed that can be built outside of the Red Line Boundary is a key condition of the Construction Agreement and therefore the percentage, as agreed by the workgroup, should be part of the CUSC and any changes to it governed by the CUSC governance process and not held within guidance or the Gate 2 Criteria Methodology. Therefore, I believe WACM4 is better than the Original.

WACM5 - The Clean Power Plan 2030 (CPP2030) and Methodologies have superseded this modification and I do not think it is appropriate to remove the concept of Project Designation as it is an important concept to allow CPP2030 to be implemented. It will be vital for NESO and the Authority to ensure the use of Project Designation is transparent and fair to all parties as it will have a significant commercial impact on Users. Therefore WACM5 is not better than the Original Proposal.

WACM6 - I think the three Methodologies include rules that are integral to the Transmission Connections Process and therefore the rules in the Methodologies should be part of the CUSC legal text. WACM6 provides a mechanism for industry to review the use of Methodologies after a period of time, which I think will be an important and useful

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exercise, although the solution will still allow each CUSC party to have the right to raise a CUSC Mod only if they feel it is appropriate. I believe WACM6 is better than the Original.

WACM7 - The need and benefits of WACM7 are unclear. Therefore, I believe WACM7 is not better than the Original.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Kyran Hanks - WWA					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Yes	Yes	Neutral	Yes	Yes
WACM4	Yes	Yes	Neutral	Yes	Yes
WACM5	Yes	Yes	Neutral	Yes	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes
WACM7	Yes	Yes	Neutral	Yes	Yes

Voting Statement:

Several of these WACMs are better than the Original. However, WACM6 opens the road to codifying the guidance which is what I think is the best implementation of this proposal.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Mohammad Bilal - UKPN					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Yes	Yes	Neutral	Yes	Yes
WACM4	Yes	Yes	Neutral	Yes	Yes

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WACM5	Yes	Yes	Neutral	Yes	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes
WACM7	Yes	Yes	Neutral	Yes	Yes

Voting Statement:

We believe that all solutions better facilitate ACO (a) as it will promote aggregated processing of connection applications by the Licensee. This will reduce the volume of individual connection applications received by the Licensee enabling a more efficient connections process. All solutions better facilitate ACO (b) as they enable different generation schemes to connect to the network quicker which helps facilitate competition in the electricity market driving down costs for the end consumer whilst decarbonising the electricity system. All solutions better facilitate ACO (d) as batched applications within application windows will drive a more efficient transmission assessment process leading to earlier connection dates.

We consider the Original solution to be more preferable.

With regards to WACM1, we believe that the current CUSC definitions for thresholds (which have an inherent link with the Grid Code) should remain as both Codes are there to support/be complementary to each other.

We understand and support the WACM2 endeavour to require DNOs to submit Relevant Embedded Power Stations that have met Gate 2 Criteria within the Gate 2 Window that the criteria is met, however it is our view that the CUSC is not the right place to place such an obligation on DNOs.

We understand the rationale behind Red Line Boundary restrictions proposed by WACM4 but believe that these should be defined in a methodology document rather than in the CUSC as we believe it to have the appropriate level of governance in a fast-paced industry that requires agile processes.

With regards to WACM5, we believe Project Designation is necessary (within appropriate bounds) as it will enable projects required to meet system needs to connect to the network earlier ensuring alignment of connections with strategic network development which facilitates a safe and reliable electricity network.

We believe methodologies as set out in the Original Solution have an appropriate level of governance, hence negates the need for WACM6. Furthermore, we do not believe it is appropriate to codify WACM6 as CUSC parties can raise a separate Code Modification to achieve this as and when required.

WACM7 can encourage speculative applications which are then withdrawn following Gate 2 Application competency. We believe the Original Solution will better facilitate the CUSC Objectives as it will ensure that the projects applying for Gate 2 plan to proceed forward towards a connection to the network.

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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
	Nina Sharma - Drax				
Original	Neutral	No	Neutral	Neutral	No
WACM1	Neutral	No	Neutral	Neutral	No
WACM2	Neutral	No	Neutral	Neutral	No
WACM3	Neutral	Neutral	Neutral	Yes	Yes
WACM4	Neutral	No	Neutral	Neutral	No
WACM5	Neutral	No	Neutral	Yes	No
WACM6	Neutral	No	Neutral	Yes	Yes
WACM7	Neutral	Yes	Neutral	Neutral	Yes

Voting Statement:

Drax have positively engaged with the reforms to the connection process. However, we have not been supportive of the development of methodologies outside of open code governance. This has led to increased project delivery risk and uncertainty for project investors and developers.

For Applicable Objective (AO) (a) the impact is assessed as neutral as it is not clear that overall efficiency is improved in line with the duties of the NESO under the Act. Little supporting quantitative evidence has been provided by the NESO as justification for how the proposed changes will address the defect. Additionally, for AO (b), there has been little quantitative evidence provided to the CUSC working group and scant assessment of the impact of the proposal or alternates. Consequently, It has not been possible to judge objectively if the impact on competition is material or proportionate. Without quantitative evidence it is considered that the original is negative against AO (b). This is on the basis that the implementation of the CUSC change may lead to undue discrimination given the code modification precedes consultation on the methodologies. We judge that AO (c) is neutral. For AO (d) we consider the original proposal is neutral. The CUSC proposal changes do not demonstrate sufficiently robust evidence that the size of the queue will be reduced, by slowing the rate at which new projects may apply or accelerating existing connection projects.

The alternatives WACM 3,6 and 7 modify the original to an extent that provide slightly more certainty to investors and developers than the original proposal. Therefore, compared with the Original proposal and Baseline these WACMS may have marginal benefit.

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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Nirmalya Biswas - Northern Powergrid					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Yes	Neutral	Neutral	Yes	Yes
WACM4	Yes	Yes	Neutral	Yes	Yes
WACM5	Yes	Yes	Neutral	Neutral	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes
WACM7	Yes	Yes	Neutral	Neutral	Yes
Voting Statement:					
<p>The original proposal is essential for removing stalled schemes from the queue, allowing shovel-ready projects to advance with enduring connections. The WACMs further enhance this by ensuring that the implementation of the CUSC modification fully benefits the connection reform process by facilitating effective checks and promoting efficiency.</p>					

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Paul Jones - Uniper					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Yes	Yes	Neutral	Yes	Yes
WACM4	Yes	Yes	Neutral	Yes	Yes
WACM5	Yes	Yes	Neutral	Yes	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes

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WACM7	Yes	Yes	Neutral	Yes	Yes
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Voting Statement:

Original: New process should help to ensure that the most ready projects are prioritised when connection offers are made. This should assist competition in the wholesale market, and for the provision of balancing and ancillary services.

WACM1: Has benefits of the original. Following work group discussions, there seems to be scope for inconsistencies to occur between Grid Code and CUSC definitions. So unlikely to be better than the original.

WACM2: Has benefits of original. Defined timescale for providing submission provides more certainty of the process.

WACM3: Has benefits of original. Defined requirements for capacity reallocation provides more certainty of the process.

WACM4: Has benefits of original. More prescribed requirements for red line boundaries provides more certainty of the process.

WACM5: Has benefits of original. Benefit of removing project designation less clear although agree with the proposer's rationale that designation is not needed for minimum viable product.

WACM6: Has benefits of original. Mandatory post implementation review may be beneficial, but would be concerned if this took up resources which could be more usefully used operationally.

WACM7: Has benefits of original. Improved by improving transparency of other connection applications and the potential this has to allow participants to further optimise the queue by taking appropriate decisions on whether or not to proceed.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
	Phillip Addison - EDF Renewables				
Original	Yes	No	Yes	Yes	Yes
WACM1	No	No	No	No	No
WACM2	No	No	No	No	No
WACM3	Yes	Yes	Yes	Yes	Yes
WACM4	Yes	Yes	Yes	Yes	Yes

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WACM5	No	No	No	No	No
WACM6	Yes	Yes	Yes	Yes	Yes
WACM7	Yes	Yes	Yes	Yes	Yes

Voting Statement:

EDF agrees with the urgent need for connection reform due to the challenges facing the industry. Overall we support what is being proposed by NESO, however, we do have significant concerns around lack of codification of key parts of the proposal. The scale of the challenge, the speed in which the reforms are being implemented, means that the route of using methodologies outside of the CUSC process is potentially the appropriate balance between flexibility to make rapid changes and providing industry with some oversight. After the initial disruption of these reforms, we believe that legal certainty should be gained by codifying the methodologies within the CUSC (hence our support for WACM 6). It would be potentially disruptive to industry's long-term investments to allow NESO to change the methodologies with reduced oversight as per the current proposed format.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Ravinder Shan - FRV TH Powertek Limited					
Original	Yes	Yes	Yes	Yes	Yes
WACM1	Yes	Neutral	Neutral	Yes	Yes
WACM2	Yes	Neutral	Neutral	Yes	Yes
WACM3	Neutral	Yes	Neutral	Yes	Yes
WACM4	Neutral	Yes	Neutral	Yes	Yes
WACM5	No	Yes	No	No	No
WACM6	Yes	Yes	Yes	Yes	Yes
WACM7	No	Neutral	Neutral	No	No

Voting Statement:

I support the Connection Reform in principle as it provides certainty to developers and reduces speculation that can lead to efficient design of the Network, achievement of Net Zero objectives and boost investor confidence. I support most of the elements of the Original proposal but there are certain elements where the proposed WACMs provide better transparency, create stronger barriers for new applications and can result in

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efficient implementation of Connection Reform on enduring basis. I support WACM 1, 2, 3, 4 and 6 as they are better than the Original in facilitating the CUSC objectives. Considering the latest draft of CNDM and Project Designation methodologies that have been shared recently, I think that the Original solution is better than the WACM 5, 7 and the Baseline.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Richard Woodward - NGET					
Original	Yes	Yes	Neutral	Neutral	Y
WACM1	Yes	Yes	Neutral	Neutral	Y
WACM2	Neutral	Yes	Neutral	Neutral	Y
WACM3	Neutral	Yes	Neutral	Neutral	Y
WACM4	No	Yes	Neutral	Neutral	Y
WACM5	No	Yes	Neutral	Neutral	Y
WACM6	Yes	Yes	Neutral	No	Y
WACM7	Neutral	Yes	Neutral	Neutral	Y

Voting Statement:

The Original CMP434 solution provides the minimum necessary changes to CUSC to facilitate the new TMO4+ arrangements. I acknowledge the feedback shared by other workgroup members though that the supporting methodologies, guidance, plus STC and STCP changes, have a major part to play in successful delivery of these new CUSC processes. It is vital that these supporting arrangements are also administered as transparently and effectively as the codes.

Nevertheless, I agree with the proposer that the MVP TMO4+ gated connections process with fixed application windows will better facilitate effective competition (AO B) and the ability for the networks to deliver timely, efficient, connections for developers (AO A). However - this can only be realised in conjunction with a strong Gate 2 criteria methodology, which not only factors project readiness but the need for the project in the context of credible strategic energy policy direction. Strong Queue Management enforcement is also necessary post-offer to ensure that projects that are allocated firm capacity/queue positions under TMO4+ progress as anticipated to completion.

All the WACMs provide a benefit compared to the baseline by deriving substantively from the original. However, I believe that the majority of the WACMs, despite their positive

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intentions, introduce potential inefficiency into CUSC arrangements compared to the original which make them less favourable. In some cases, I believe the proposed WACMs could even stifle the reasonable actions of the NESO in discharging their statutory obligations in conjunction with other network licensees (AO A). I believe that WACM1 might have some merit on the basis that the downstream distribution market entry process remains unclear to developers. There is also wider work on this topic that might provide better options for clarity.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Rob Smith - Enso Energy					
Original	Yes	No	Neutral	No	Yes
WACM1	Yes	No	Neutral	No	Yes
WACM2	Yes	No	Neutral	No	Yes
WACM3	Yes	No	Neutral	No	Yes
WACM4	Yes	No	Neutral	No	Yes
WACM5	Yes	No	Neutral	No	Yes
WACM6	Yes	No	Neutral	No	Yes
WACM7	Yes	No	Neutral	No	Yes

Voting Statement:

Objective A

All the proposals better meet objective A in so far as they allow the proposer to more effectively meet its Net Zero objectives. However, whether this is done in an effective and non-discriminatory manner is difficult to assess given the detail of how this will be achieved is captured outside of the CUSC documentation.

Objective B

It is not clear that the proposal better meets objective B. It is not clear that it will promote the projects best placed to meet Net Zero and seems more focused on slimming down the number projects and capacity of projects in the queue to better meet objective A. This is given weight by the fact that CP2030 has subsequently been proposed to meet the 2030 Net Zero target.

Objective C

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Neutral: No comment

Objective D

It is perplexing that, given past commentary from the regulator, most industry parties academics and commentators, that there are too many separate codes and associated documents governing the industry, that the proposer would seek to increase that number. How they have drawn the conclusion that fragmentation rather than consolidation better facilitates CUSC objective D, and allows applicants to better, and more speedily, navigate this complex administrative process and deliver their much needed zero carbon projects appears to be missing from the discourse.

The rationale seems to have been predominately focused on how the proposer can more easily change the rules to meet its objectives, absent the same level of scrutiny that the CUSC modification process affords the market. In doing so it forgoes the opportunity of robust evaluation of a change, by industry members with considerable knowledge of the market, to assess its practicability, benefit and risk of unintended consequences.

These current connection reform CUSC modifications, afforded urgent status, have been undertaken at pace. They demonstrate that the CUSC process can deliver timely change on significant scale if needed. If the process is not working effectively then it should be amended, as is the philosophy of code open governance, rather than dispersing the information across multiple codes and methodologies that create greater complexity for the commercial parties that will need to accurately abide by them to transact their business or risk considerable costs.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Rohit Alexander - Statkraft					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Yes	Yes	Yes	Neutral	Yes
WACM3	Yes	Neutral	Neutral	Yes	Yes
WACM4	No	Neutral	Neutral	No	No
WACM5	Neutral	Neutral	Neutral	Neutral	No
WACM6	Neutral	Neutral	Neutral	Neutral	No
WACM7	Yes	Yes	Yes	Neutral	Yes

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Voting Statement:

No voting statement provided.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Ross O'Hare - SSEN					
Original	Yes	Yes	Yes	Yes	Yes
WACM1	Neutral	Yes	Yes	Yes	Yes
WACM2	Neutral	Neutral	Neutral	Neutral	No
WACM3	Neutral	Neutral	Neutral	Neutral	No
WACM4	Neutral	Neutral	Neutral	Neutral	No
WACM5	Neutral	Neutral	Neutral	Neutral	Yes
WACM6	No	No	No	No	No
WACM7	Yes	Yes	Yes	Yes	Yes

Voting Statement:

SSEN Distribution strongly support the Original, WACM 1 and WACM 7, as they are the best opportunities to reform the process and set up the new connections process for success. SSEN's preferred solution is WACM1.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Ruby Pelling - NESO					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	No	Yes
WACM2	Yes	Yes	Neutral	Neutral	Yes
WACM3	No	Yes	Neutral	Yes	Yes

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WACM4	Yes	Yes	Neutral	Yes	Yes
WACM5	Yes	Yes	Neutral	Yes	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes
WACM7	Yes	Yes	Neutral	Yes	Yes

The Original Proposal overall better facilitates the applicable objectives (a), (b) and (d). The Original Proposal allows a new queue to be made up of readier and more viable projects to enable delivery of the government's net zero targets. The proposal contributes to the facilitation of quicker connections for those projects that are ready and viable by removing speculative and stalled projects from the connections queue. The original proposal plays a key role in enabling the development of a coordinated and efficient network design for connections, delivering benefits to both customers and consumers.

I believe that WACM 1, WACM 2, WACM 3, WACM 4, WACM 5, WACM 6 and WACM 7 are overall better than the baseline as they are broadly in line with the Original Proposal and are materially similar.

WACM 1 is broadly in line with the original's intent as it introduces an application based and gated connections process that is able to prioritise readier and/or more viable projects, enabling NESO to help the government to meet its net zero targets. However, in terms of applicable objective (d) I think that WACM 1 could cause unintended consequences by hosting different definitions and threshold values across two industry codes, when Grid Code processes feed into the CUSC. This has the potential to create confusion and additional complexity especially to Users who are new to the industry. For these reasons, I consider the Original Proposal to better facilitate the applicable objectives than WACM 1.

WACM 2's intention is to reduce delays to the administration of the primary process and mitigate risk to embedded customers, in order to maintain equitable treatment between DNO and Transmission projects. However, in terms of Applicable Objective (d) I believe it would be more efficient to discharge an explicit obligation outside of the CUSC as DNO/transmission connected iDNO customers aren't always a party to the CUSC, who are the party which need/want this obligation. Therefore, DCUSA could be better placed to address this absolute requirement. For these reasons, I consider the Original Proposal to better facilitate the applicable objectives than WACM 2.

WACM 3 in addition to the Original Proposal seeks to codify the process for reallocating capacity from terminated offers to other contracted projects that have already passed Gate 2, removing Element 9 (Project Designation) and Element 10 (Connection Point and Capacity Reservation), with the objective to facilitate this process efficiently through a simple approach. I consider WACM 3 to not better facilitate AO (a) as it would constrain the Methodologies in a way which would be misaligned with NESO's broader objectives.

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Therefore, whilst I believe WACM 3 is better than the baseline, I consider the Original Proposal to better facilitate the applicable objectives than WACM 3.

WACM 4's only difference to the Original Proposal is to codify Element 11.3 of the Original Proposal. This WACM is materially similar to the Original Proposal and therefore I consider this to be better than the current baseline. However, having no exemptions in place could result in unintended consequences, negatively impacting projects that could be made unviable in the future, due to an objectively minor non-compliance. Therefore, I consider the Original Proposal to better facilitate the applicable objectives than WACM 4.

WACM 5 seeks to remove Element 9 (Project Designation) from the Original Proposal. Whilst materially similar to the Original Proposal, I believe that the inclusion of Project Designation within the Primary Process would facilitate better network outcomes, system security and a more efficient connection process, whilst delivering the best outcomes for consumers. Whilst I consider WACM 5 to be better than the baseline, it does have the potential to introduce material detrimental unintended consequences on security of supply, network efficiency and consumers. Therefore, I consider the Original Proposal to protect against these potential material issues for networks and consumers and therefore better facilitate the applicable objectives than WACM 5.

WACM 6 supports the use of the Methodologies, which are core to the primary process outlined in the Original Proposal, therefore I consider WACM 6 to be better than the baseline. However, I believe it should be the Transmission License that sets out the appropriate expectations for a review and the process for revising the Methodologies, rather than the CUSC, due to the fact the Methodologies have derived from the Transmission License. I also consider the ultimate intention of WACM 6 is to codify the Methodologies. This would hinder NESO's ability to make efficient and decisive changes and impact NESO's ability to comply with current and future obligations more broadly. For these reasons, I believe that the Original Proposal better facilitates the applicable objectives than WACM 6.

WACM 7 seeks to add an additional process step through an industry pause for market self-regulation. Whilst I can see some limited value through creating additional transparency to enable facilitation of competition, overall, I consider WACM7 to elongate the process and could add unnecessary complexity and so whilst better than the baseline, do not believe it would better facilitate the applicable objectives than the Original Proposal.

Overall, I do not feel that any of the WACMs facilitate the ACOs better than the Original Proposal.

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Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Sam Aitchison - Island GP					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	No	Neutral	Neutral	No	No
WACM2	Yes	Yes	Neutral	Yes	Yes
WACM3	Yes	Yes	Neutral	Yes	Yes
WACM4	Yes	Yes	Neutral	Yes	Yes
WACM5	Yes	Neutral	Neutral	Neutral	No
WACM6	No	Neutral	Neutral	Yes	No
WACM7	Yes	Yes	Neutral	Yes	Yes
Voting Statement:					
<p>Whilst we do not agree with the whole of the original proposal, we believe it better facilitates the objectives 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.</p>					

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Wendy Mantle - SPEN					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Yes	Yes	Neutral	No	No
WACM3	Yes	Yes	Neutral	Neutral	Yes
WACM4	No	Yes	Neutral	No	Yes
WACM5	No	No	Neutral	No	No
WACM6	Yes	Yes	Neutral	No	No
WACM7	Yes	Yes	Neutral	No	No

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Voting Statement:

Overall, I believe the original and WACM1 best meets the applicable CUSC objectives, recognising that the proposals introduced the gated process which will facilitate the raising of entry requirements and support increased network design coordination but that the supporting methodologies sit outside of the code.

Reasoning for the votes is as following:

Objective A

Positive: The proposals introduce a process that will allow projects to be prioritised based on readiness, facilitating the design of a more co-ordinated system, potentially freeing up network capacity for projects who are able to progress. This approach will help deliver Clean Power 2030 and net zero ambitions.

Negative: WACM4 risks limiting the flexibility facilitated by the approach to have methodologies outside of the Code, particularly in the early years and for WACM5 Project Designation is required for the development of an efficient, economic and co-ordinated system therefore it is not appropriate to remove.

Objective B

Positive: The proposals, along with the methodologies that will sit outside of the code, introduces the structure for a reformed connections process. The introduction of the gated process helps facilitate effective competition, facilitating quicker connections for those more viable projects.

Negative: For WACM5, Project Designation is required for the development of an efficient, economic and co-ordinated system therefore not appropriate to remove.

Objective C

Neutral: We believe this is neutral for original and all WACMs as industry participants already comply with the relevant legislation and will continue to do.

Objective D

Positive: The new gated process promotes efficiency, will facilitate the allocation of capacity to those projects most ready to proceed and should provide a more co-ordinated and efficient network design.

Negative:

WACM2 places an unrealistic expectation on DNOs to submit late and or complex applications within the window, therefore does not promote efficiency.

WACM4 risks limiting the flexibility facilitated by the approach to have the methodologies outside of the Code, particularly in the early years.

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WACM6 is unnecessary as the NESO is already expected to have the obligation to review and consult on the methodologies, with any party then able to raise a Code Mod under open governance. This proposal is does not promote efficiency.

WACM7 does not promote efficiency as under TMO4+ the NESO will already commit to publishing the outcomes of the application windows and additional information on projects not in the queue. Connection and Planning information is already available through public registers, therefore this is unnecessary and ties up resources.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Zygimantas Rimkus - Buchan Offshore Wind					
Original	Yes	Yes	Neutral	Yes	Yes
WACM1	Yes	Yes	Neutral	Yes	Yes
WACM2	Neutral	Neutral	Neutral	Neutral	Yes
WACM3	Yes	Yes	Neutral	Yes	Yes
WACM4	Neutral	Neutral	Neutral	Neutral	Yes
WACM5	Neutral	Neutral	Neutral	Neutral	Yes
WACM6	Yes	Yes	Neutral	Yes	Yes
WACM7	Neutral	Neutral	Neutral	Neutral	Yes

Voting Statement:

I believe the original version of CMP434 introduces the necessary changes to CUSC to facilitate the proposed new TMO4+ solution. The objectives of CUSC should be clear, well-defined, and easy for various stakeholders to understand.

Of the 32 votes, how many voters said this option was better than the Baseline.

Option	Number of voters that voted this option as better than the Baseline
Original	26
WACM1	21
WACM2	22

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WACM3	27
WACM4	23
WACM5	19
WACM6	23
WACM7	24

Stage 2b – Workgroup Vote

Which option is the best? (Baseline, Proposer solution (Original Proposal), WACM1 or WACM2)

Workgroup Member	Company	Industry Sector	BEST Option?	Which objective(s) does the change better facilitate? (if baseline not applicable)
Allan Love	Scottish Power Transmission	Onshore Transmission Licensee	WACM1	A, B, D
Andy Dekany	NGV	Interconnector	Original	A, D
Anthony Cotton	Green Generation Energy Networks Cymru Ltd.	Network Operator / iDNO	Baseline	N/A
Ben Adamson	Low Carbon	Generator	WACM6	None
Bill Scott	Eclipse Power Networks	Network Operator / iDNO	Original	A, B, D
Brian Hoy	Electricity North West	Network Operator	WACM1	A, B, D
Charles Yates	Fred Olsen Seawind	Generator	WACM7	A, B, C, D
Ciaran Fitzgerald	Scottish Power Renewables	Generator	WACM6	A, B, D
Claire Hynes	RWE Renewables	Generator	WACM6	A, D
Garth Graham	SSE Generation	Generator	WACM5	A, B, D
Grant Rogers	Qualitas Energy	Generator	WACM3	A, B, C, D
Greg Stevenson	SSEN Transmission	Onshore Transmission Licensee	Original	A, B, D
Helen Stack	Centrica	Generator	WACM2	A, B, D

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Jack Purchase	NGED	Network Operator	Original	A, B, C, D
James Jackson	Orsted	Generator	WACM6	A, B, D
Joe Colebrook	Innova Renewables	Generator	WACM1	A, B, D
Kyran Hanks	WWA	Panel Member	WACM6	A, B, D
Mohammad Bilal	UKPN	Network Operator	Original	A, B, D
Nina Sharma	Drax	Generator	WACM6	D
Nirmalya Biswas	Northern Powergrid	Network Operator	Original	A, B, D
Paul Jones	Uniper	Generator	WACM7	A, B, D
Phillip Addison	EDF Renewables	Generator	WACM6	A, B, C, D
Ravinder Shan	FRV TH Powertek Limited	Generator	WACM6	A, B, C, D
Richard Woodward	NGET	Onshore Transmission Licensee	Original	A, B
Rob Smith	Enso Energy	Generator	WACM6	A
Rohit Alexander	Statkraft	Generator	WACM7	A, B, C
Ross O'Hare	SSEN	Network Operator	WACM1	B, C, D
Ruby Pelling	NESO	System Operator	Original	A, B, D
Sam Aitchison	Island GP	Generator	WACM2	A, B, D
Wendy Mantle	SPEN	Network Operator	WACM1	A, B, D
Zygimantas Rimkus	Buchan Offshore Wind	Generator	WACM6	A, B, D