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:	Simon Wragg	
Company name:	Ethos Green Energy Solutions Limited	
Email address:	simon@ethosgreenenergy.com	
Phone number:	07879534335	
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:

Public

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
		Developers require more clarity in relation to Nodal connection points prior to triggering Gate 2. This could be demonstrated by securing the required land area under exclusivity and agreed commercial terms demonstrated by a sign Heads of Terms, at which point NGET should confirm / advise as to the area where the proposed point of connection will be. For an example for a solar NSIP transmission connection the average

		budget to secure multiple land parcels is between £500,000 and £1m to demonstrate Gate 2 compliance. These funds will be lost if the developer is then informed that there will be an alternative point of connection. There needs to be another step between Gate 1 and Gate 2 to avoid this. If the confirmed POC is significantly deviates from the location requested in the grid application this needs to be highlighted by NGET prior to gate 2 application process by the developer. For developers with existing contracts and posted credit to National Grid, a 12-month window should be granted to accept a Gate 2 offer if the confirmed point of connection is not in close proximity to their Original Red Line Boundary. Over the past 20 months, National Grid has not allocated sufficient resources to finalize connection points for signed Bilateral Connection and Construction Agreements, despite developers being required to maintain substantial credit postings to keep these agreements active.
2	Do you have a preferred proposed solution?	☐Original ☒WACM1 ☐WACM2 ☒WACM3 ☐WACM4 ☐WACM5 ☐WACM6 ☐WACM7 ☐Baseline ☐No preference

		Ethos agree the Original Solution (NESOs proposals) and all alternative solutions are better than the existing process (the baseline). We believe Alternative 1 (WACM1) is the best solution as will clarify the definition of relevant Embedded Generators for Transmission Impact Assessments (TIAs). We also agree with WACM 3 proposal for reallocating capacity based on queue position.
3	Do you support the proposed implementation approach?	☐Yes ☒No
		Ethos would like the implementation date to be immediately after the Authority Approval date (or as close as reasonably practicable) to ensure Gate 2 Offers are issued ASAP, providing investor certainty.
4	Do you have any other comments?	Ethos is concerned Queue Management Milestones are no longer fit for purpose. New projects will need to apply for a connection date at least 6 years away for TCPA and 7 years away for DCO to ensure they have 2 years and 3 years respectively to submit planning. We believe queue management milestones should be reviewed, possibly via another CUSC Modification. There is also a cliff edge if there is 4 years or 5 years between Gate 2 Offer date and the connection date, at this cliff edge a difference of 1 day could change the milestone for planning submission by 12 months, see graph below for more detail. Ethos strongly supports the specific arrangements for Staged connections, which allow one of more technologies to progress through to a Gate 2 offer and one or more technologies to keep a gate 1 offer. This allows co-located projects to be developed on different timelines and connected as and when ready. Ethos strongly supports the change to bi-annual application windows with Gate 1 and Gate 2 windows running in parallel, this provides more flexibility to the process.

		Ethos has major concerns over the NESO CP30 predictions which states that 90% of renewable energy project will be delivered at DNO level, specifically relating to solar projects where the larger capacities to meet the Government target can be achieved. The boundaries between the DNO and TO need to be more flexible.
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 ☐No No Comment