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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:	Barney Cowin	
Company name:	Nadara Bluefloat Partnership	
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Phone number:	07858 363966	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" 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 Panel or the industry for further consideration*)

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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 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM1 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM2 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM3 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM4 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM5 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
		WACM6 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
WACM7 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d		

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		<p>Original</p> <p>The original proposal, as supported by WACM6 and WACM7, better facilitates the Applicable Objectives. We do have some concerns about the proposal and also about the lack of certainty and definition of other key industry interactions, such as the Government’s decision following the CP2030 advice (not yet published), and the outcome of the supporting methodologies, supporting guidance and potential introduction of a financial instrument. It is difficult to fully assess the impacts and understand the scope of unintended consequences without knowing the outcomes of these initiatives. However, we do acknowledge that the current connections process is not fit for purpose and that timescales are extremely compressed, so believe that this represents the best available option at this point in time.</p> <p>We welcome in particular the introduction of strategic alignment as a key consideration of the connections process, although have some concerns about the scope and implementation, which we will outline in our response to the methodologies.</p> <p>WACM1 - neutral</p> <p>WACM2 - neutral</p> <p>WACM3 – We do not support this as whilst we appreciate that this introduces some additional certainty into queue management, it does so at the expense of the useful flexibility of application of two useful mechanisms (Project Designation / Connection Point and Capacity Reservation)</p> <p>WACM4 – We do not support this as codification of the Red Line Boundary process is unnecessary and removes flexibility for adjustment of a process which is as yet untested.</p> <p>WACM5 – We do not support this WACM as it removes a useful methodology which can be used by NESO and the wider industry to progress projects that are required by CP2030.</p>
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		<p>WACM6 – This WACM introduces greater visibility of the methodologies and greater certainty over the process, so we support implementation.</p> <p>WACM7 – This WACM provides a pragmatic approach to implementation, allowing industry an opportunity to assess project viability on the basis of the published results of the compliance checks.</p>
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/> Original</p> <p><input type="checkbox"/> WACM1</p> <p><input type="checkbox"/> WACM2</p> <p><input type="checkbox"/> WACM3</p> <p><input type="checkbox"/> WACM4</p> <p><input type="checkbox"/> WACM5</p> <p><input checked="" type="checkbox"/> WACM6</p> <p><input checked="" type="checkbox"/> WACM7</p> <p><input type="checkbox"/> Baseline</p> <p><input type="checkbox"/> No preference</p>
		<p>Our proposed solution would include implementation of the Original proposal alongside WACM6 and WACM7. See above for our rationale.</p>
3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
		<p>We broadly support the implementation approach as representing the best option available at this point in time. However given the speed at which this workgroup consultation has progressed, and the very late intervention and introduction of strategic alignment with the connections process, implementation should allow for further adjustments over the coming months to</p>

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		<p>ensure that all options for implementation of CP2030 remain available.</p> <p>We note in particular the proposed interactions of CP2030 with other industry initiatives and reforms, and strongly support ongoing flexibility to accommodate necessary reforms into the connections process and connections network design considerations where appropriate to ensure the CP2030 objectives remain achievable.</p>
4	Do you have any other comments?	<p>We broadly – with the reservations regarding transparency and appropriateness of application by NESO – support the Project Designation and Connection Point and Capacity Reservation processes as providing an additional tool to implement the CP2030 pathway when this is published. Once we have the CP2030 pathways we urge NESO to look again at how these tools can be best applied to enable the objectives.</p>
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?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>