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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:	Michelle MacDonald Sandison	
Company name:	SSEN Distribution	
Email address:	Michelle.macdonaldsandison@sse.com	
Phone number:	01738 342183	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

(Please mark the relevant box)

Non-Confidential (*this will be shared with industry and the Panel for further consideration*)

Confidential (*this will be disclosed to the Authority in full but, unless specified, will not be shared with the 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 checked="" type="checkbox"/> b <input checked="" type="checkbox"/> c <input checked="" 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 type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d
WACM7 <input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input type="checkbox"/> d		

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		<p>SSEN Distribution believes the Original proposal better facilitates objectives A, B and D as it will significantly amend the current connections process to a state where projects that are ready and needed, can connect to the network. We also believe the Original will promote efficiency in the implementation of CUSC arrangements as it is currently the most efficient way to achieve the aims of this modification.</p> <p>We also support WACM 1 as it delinks the commercial side of the connections process from the technical definitions that define a project as 'small, medium or large' within Grid Code. We believe this is a positive improvement to ensure the front-end connections process is not adversely affected by any potential change to the grid code definition.</p>
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/>Original</p> <p><input checked="" 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 type="checkbox"/>WACM6</p> <p><input type="checkbox"/>WACM7</p> <p><input type="checkbox"/>Baseline</p> <p><input type="checkbox"/>No preference</p> <p>SSEN Distribution have been one of the many parties calling for a reform to the connections process. We have been an active participant in the CUSC modification and the wider changes in industry to support a new, reformed connections process which is fit for purpose for years to come.</p>

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		<p>There are a few key objectives we see which are key for reform. This includes delivering a better process for allocation of network capacity – the previous first come, first served with a shallow connection boundary has proven not to work. We need to ensure available capacity is allocated to those who can best utilise it and avoid stagnant connections blocking the queue.</p> <p>Finally, we need to reduce the volume of speculative connection applications which drive unnecessary costs and reduce the level of service networks can provide to other genuine applicants.</p> <p>To enable this, we need ambition in the scale of change required and clarity on the ruleset for customers and networks.</p> <p>There must be clear powers under licence/legislation to remove customers from the queue to reduce threat of legal challenge, and sufficient time to rework the queue to get it right and communicate those outcomes with customers.</p> <p>We are key supporters of the reforms as proposed by NESO, as these are vital to change the as-is process and move us away from the stagnated and outdated connections process. The new first ready, first needed, first connected process needs to ensure the queue is reflective of the needs to deliver net zero, CP30 and SSEP at the right costs for customers and consumers.</p> <p>To achieve the greatest success of a reformed framework that works for now and for future, we believe the best options to achieve this are the Original and WACM 1 as detailed in question 1.</p> <p>We do not support the implementation of WACMs 2-7 for various reasons, but the overall message is that these WACMs will not deliver the scale of change required.</p>
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3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>We note the change of implementation approach from the workgroup consultation to the current code administrator consultation. We were critical of the implementation approach in the workgroup consultation due to the overly ambitious timescales originally set out. Therefore, we welcome the revised timeline as proposed by NESO, and whilst we believe there to be a significant amount of work required to set networks up for success in a reformed process, we do support the implementation approach as proposed.</p> <p>We welcome that no new transmission applications that are in scope of the proposed changes will be processed between the implementation date and the first window opening, as this allows for the ‘current world’ process to fully conclude ahead of beginning the new reformed process.</p> <p>We note the lack of industry wide pause to new applications that required transmission studies remains as an oversight and something that can place pressure and complexity on future new windows. Continuing without a pause can add to the workload on each DNO and puts a risk of successfully managing the change and implementation of the revised new process.</p> <p>We continue to recommend an implementation date that is aligned to regulation, licence changes and energy policy, while also being able to incorporate the additional concepts being discussed, such as CP2030 and alignment of the TMO4+ process with FES and SSEP to support delivery of CP2030, to enable a fully formed solution that delivers a more needs-based approach to connections that is also strategic and enduring.</p>
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<p>4</p>	<p>Do you have any other comments?</p>	<p>SSEN Distribution remains supportive that the principles of the Methodologies (Element 1) are codified, but that the detail is held outside of the code to ensure it remains agile and can be updated when required without a lengthy code change process. We believe the introduction of a bi-annual window (Element 2) from the networks perspective tightens the timeframe to be able to assess the projects in a cumulative fashion, however we appreciate bi-annual is a better fit for customers. We agree with the information that will be provided as part of the Gate 2 offer. We are also supportive of the DNOs providing basic information within 5 working days of the application window closing to support the production of the CPA.</p> <p>We believe the projects that are deemed in scope (Element 3) are accurate and support that embedded demand is out of scope as this feels appropriate based on the volumes of large demand seen in the distribution system. Along this line, we agree with the principle of codifying the details of a significant modification application (Element 4), but the criteria must be clear and cannot be weaker than the ENA Fair and Effective Management of DNO Connection Queues: Treatment of Requests to Change Connection Applications Good Practice Guide (if stronger, then the ENA document will need to be updated to align).</p> <p>SSEN will be feeding back their commentary relating to the methodologies (Element 9,11 and 13) via their respective consultations.</p> <p>We support the removal of Element 14.</p> <p>We support the alignment in the offer and acceptance timescales with the Primary Process timescales (Element 15).</p> <p>From our reading of this consultation, we have identified an inconsistency between Element 5 and Element 18. Element 5 highlights DNO applications to</p>
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5	<p>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>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>