

Workgroup Consultation Response Proforma

CMP435: Application of Gate 2 Criteria to existing contracted background

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@nationalgrideso.com by **5pm on 06 August 2024**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Peter Rumbold	
Company name:	Commonwealth Asset Management (CWAM)	
Email address:	PR@cwamgroup.com	
Phone number:	+1-424-363-0176	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input checked="" type="checkbox"/> Demand <input 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 Workgroup, Panel or the industry for further consideration*)

For reference the Applicable CUSC (non-charging) Objectives are:

- a) *The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- b) *Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;*
- c) *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*

d) *Promoting efficiency in the implementation and administration of the CUSC arrangements.*

*The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.

Standard Workgroup Consultation questions	
1	<p>Do you believe that the Original Proposal better facilitates the Applicable Objectives?</p> <p>Mark the Objectives which you believe the Original solution better facilitates:</p> <p>Original <input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</p> <p>Given the crossover between CMP 434 and CMP 435, we have not responded to each element; rather, we have responded only to the sections that are specific to the application of 434 to the existing queue. Our full response to 434 contains our views on the details of reform.</p> <p>We do support the application of the new process to all projects in the existing queue and believe this is critical to ensuring the reforms deliver the desired impact.</p>
2	<p>Do you support the proposed implementation approach? (See page- 57-58)</p> <p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>We broadly agree with the implementation approach but do have views on how to ensure these reforms are adopted and enacted as quickly as possible:</p> <ul style="list-style-type: none"> • We believe it is imperative that NGESO and TOs are resourced adequately to implement these critical reforms. The level of resourcing must be sufficient to: <ol style="list-style-type: none"> 1. Ensure all projects self-identifying as meeting the Gate 2 criteria are compliant with the criteria and 2. Allow for active queue management to take place so that projects that pass Gate 2 are checked to ensure they are progressing per their requirements. • We expect a large number of projects will self-declare by the 31 January deadline as having met the Gate 2 criteria. Assessing these projects as swiftly as possible will be critical to the proposed reforms fulfilling their objective. Adequately resourcing this endeavour is essential. • The guidance published must be very clear on timings and requirements so that there is zero ambiguity and users understand the requirements on them.
3	Do you have any other comments?

Click or tap here to enter text.	
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? <input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input type="checkbox"/> No
Click or tap here to enter text.	

Specific Workgroup Consultation questions	
5	Do you agree with the elements of the proposed solution for CMP435? <i>Please note that the application of these elements may be different to CMP434, therefore please answer the questions in respect to CMP435.</i> Elements 2,4,6,7,12,15,17 and 18 are not part of the CMP435 Proposal and is only part of the CMP434 Proposal. Element 10 is proposed to be codified within the STC through modification CM095 . Please provide rationale for your answer and any suggestions for improvement to each element?
Element 1: Proposed Authority approved methodologies and ESO guidance (see Page 8-10,29) <input type="checkbox"/> Yes <input type="checkbox"/> No	
Click or tap here to enter text.	
Element 3: Clarifying which projects go through the Primary Process (See pages 10-11,29-31) <input type="checkbox"/> Yes <input type="checkbox"/> No	
Click or tap here to enter text.	
Element 5: Clarifying any Primary Process differences for customer groups (See pages 11-12,32) <input type="checkbox"/> Yes <input type="checkbox"/> No	
Click or tap here to enter text.	
Element 8: Longstop Date for Gate 1 Agreements (See pages 12-13, 32-33) <input type="checkbox"/> Yes <input type="checkbox"/> No	
Click or tap here to enter text.	
Element 9: Project Designation (See pages 14-15, 33-34) We agree that NGESO should have the power to accelerate the queue position and connection date of designated projects. However, we believe greater consideration should be given to prioritising strategic demand projects that are critical to driving economic growth and that align with the government’s industrial strategy. We appreciate that reforms of this nature may be beyond the scope of this consultation, but as grid connection reform	
<input type="checkbox"/> Yes <input type="checkbox"/> No	

<p>continues, we believe this is an essential requirement to ensure wider infrastructure-enabling reforms work together to accelerate delivery.</p> <p>To this end, the Project Designation Methodology criteria should be revised to include strategic demand projects that align with government growth and industrial strategy objectives. This should cover sectors like data centres, advanced manufacturing and EV infrastructure. These industries are not only crucial for economic growth but also vital to making progress towards the UK's 2050 net zero target.</p> <p>It is particularly important that the needs of strategic demand projects with significant energy requirements are explicitly recognised in the proposed reforms to the grid connections queue. The government is currently pursuing a host of supply-side measures, e.g. planning reform, to boost investment in critical national infrastructure, which we fully support. If grid connection reform does not work in concert with these policy measures to reduce the barriers to investment and infrastructure deployment, it risks undermining the government's growth ambitions.</p>	
<p>Click or tap here to enter text.</p>	
<p>Element 11: Setting out the criteria for demonstrating Gate 2 has been achieved and setting out the obligations imposed once Gate 2 has been achieved (See pages 16-21, 34-39)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>Element 13: Gate 2 Criteria Evidence Assessment (See pages 22-23, 39-40)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>Element 14: Gate 2 Offer and Project Site Location Change (See pages 23-24, 40-41)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>Element 16: Introducing the proposed Connections Network Design Methodology (CNDM) (See pages 24-25, 41-42)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p>Element 19: Contractual changes (See pages 26-28, 43-46)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>We support the proposal that projects in the queue must self-certify whether they meet Gate 2 and, when doing so, can request an earlier connection date.</p> <p>The challenge of assessing the large number of projects that make such an application will be significant. As above, in answer to Question 2, we consider it imperative that this endeavour is resourced appropriately. Further, we consider that the process must be robust to ensure that only projects that truly meet Gate 2</p>	

	(including the ongoing compliance requirements) are given an earlier connection date. We, therefore, support a robust approach to sample checking.	
	Element 20: Cut Over arrangements (See page 28, 47)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	
6	Are there any elements of the proposed CMP435 solution - as per Q5 - which you believe are not appropriate to include when you consider how to most effectively implement TMO4+ to projects in the existing contracted background (as opposed to the process for new applicants via CMP434)? If yes, please provide supporting justification.	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	
7	In relation to Q6, are there any features which you believe are missing in the proposed CMP435 solution that would more effectively facilitate implementation of TMO4+ to the existing contracted background. If yes, please provide details and justification. In answer to Question 5, Element 6 and Element 11, in our response to CMP434, we set out that the criteria for Gates 1 and 2 should be strengthened. We provide our view on what we consider the appropriate criteria should be. The Gate 1 criteria should be: <ul style="list-style-type: none"> • Secured land rights or a binding contract to acquire the land within a period of time and • A commitment to submit (outline) planning within a set period of time. Gate 2 should require that outline planning permission must be secured.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8	Do you believe any groups of projects should be exempt from the scope of CMP435 or from some elements of the proposed solution? If so, please advise on which groups and elements and provide rationale to why.	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	
9	Do you believe that the proposed solution could duly or unduly discriminate against any particular types of projects? If so, do you believe this is justified?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Click or tap here to enter text.	