

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:	Alice Taylor	
Company name:	National Grid ESO	
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Phone number:	07895 310443	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input 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 checked="" 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:

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- 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;*
- 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	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	<div>Mark the Objectives which you believe the Original solution better facilitates:</div> <div>Original <input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</div> <p>Overall, the ESO believes that the proposal addresses the growing GB transmission queue by extending the reformed connections process to the existing connections queue. We see the introduction of this reformed connection process to the existing queue, necessary to allow more timely connection of projects delivering benefits to both customers and consumers.</p> <p>We consider the proposal better facilities objective (a) as by addressing the existing connections queue this enables those projects that are readier and more viable to connect ahead of those projects that are stalled, which enable us to help the government to reach its Net Zero targets.</p> <p>We consider the proposal better facilitates objective (b) as it will allow for quicker connections for viable projects that are needed to deliver Net Zero. Currently, projects in the existing queue are experiencing delays to connect which hinders the progress to deliver Net Zero.</p> <p>We consider the proposal neutral against objective (c).</p> <p>We consider the proposal better facilitates objective (d) by addressing the current connections queue, with the introduction of a gated process, it can allow for more viable projects to access earlier connection dates, providing a more efficient network design for connections and therefore delivering benefits to customers and consumers.</p>
2	Do you support the proposed implementation approach? (See page- 57-58)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	We support the general proposed implementation approach but recognise that the process steps and timescales may need to change post consultation.	
3	<p>Do you have any other comments?</p> <p>Our solution is highlighted in the consultation document. However, we are keen to hear from stakeholders who feel that the proposed solution can be improved in any areas and any subsequent feedback will be taken into account in developing our final proposal. This is true of any of the areas examined within this consultation and we look forward to receiving any and all feedback on CMP435. Our views are presented as they were at the time of responding to this consultation and may change if we receive feedback during the consultation.</p>	
4	<p>Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?</p>	<p><input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section)</p> <p><input checked="" type="checkbox"/> No</p>

Specific Workgroup Consultation questions

5	<p>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></p> <p>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.</p> <p>Please provide rationale for your answer and any suggestions for improvement to each element?</p>	
	<p>Element 1: Proposed Authority approved methodologies and ESO guidance (see Page 8-10,29)</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
	<p>We believe that Element 1 is required to establish how methodologies are approved by the Authority and to establish where the ESO will set out guidance.</p>	
	<p>Element 3: Clarifying which projects go through the Primary Process (See pages 10-11,29-31)</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
	<p>The proposed solution outlines the projects that are captured under the existing connections queue and are therefore applicable under the CMP435 proposal.</p>	
	<p>Element 5: Clarifying any Primary Process differences for customer groups (See pages 11-12,32)</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
	<p>The proposed solution clarifies any differences for specific customer groups and the reasoning for this.</p>	

Element 8: Longstop Date for Gate 1 Agreements (See pages 12-13, 32-33)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
We support the proposal of a Longstop Date with those existing connection contracts 3-year period commencing at the point at which they become akin to a Gate 1 contract.	
Element 9: Project Designation (See pages 14-15, 33-34)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
We support the proposal to create a concept and an associated non-codified Methodology (proposed to be approved by the Authority) that would enable the ESO to designate specific projects in line with the proposed Project Designation Methodology.	
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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Our view is that the concept of Gate 2 criteria should be codified but the outlined criteria itself should sit in the proposed Methodology, proposed to be approved by the Authority. We believe Element 11 clearly outlines the intended obligations for projects to achieve Gate 2.	
Element 13: Gate 2 Criteria Evidence Assessment (See pages 22-23, 39-40)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The evidence assessment set out in the proposal is required to ensure that evidence provided for each project is sufficiently robust.	
Element 14: Gate 2 Offer and Project Site Location Change (See pages 23-24, 40-41)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The proposed solution offers a robust and pragmatic way to deal with location changes in certain circumstances.	
Element 16: Introducing the proposed Connections Network Design Methodology (CNDM) (See pages 24-25, 41-42)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
An ESO/TO CNDM will need to be developed to set out how connections network design will be undertaken in relation to the Gate 2 to Whole Queue process. We support the proposal that the proposed CNDM should not be codified.	
Element 19: Contractual changes (See pages 26-28, 43-46)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
We support the proposed solution which clarifies the contractual changes when applying Gate 2 criteria to the Whole Queue and converting current connection agreements with the ESO to either Gate 1 or Gate 2 agreements.	
Element 20: Cut Over arrangements (See page 28, 47)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
We believe defining the Cut Over arrangements is important for the ESO and TOs to migrate into the new process, to help mitigate potential risks or issues during the period of time between the current connections process and the proposed new process.	

6	<p>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)?</p> <p>If yes, please provide supporting justification.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
7	<p>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.</p> <p>If yes, please provide details and justification.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
8	<p>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.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9	<p>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?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	<p>Whilst there are proposed process differences in certain circumstances, we do not believe these are discriminatory differences.</p>	