

## Workgroup 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@nationalgrideso.com](mailto: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](mailto:cusc.team@nationalgrideso.com).

Respondent details	Please enter your details	
<b>Respondent name:</b>	Charles Gamble	
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<b>Phone number:</b>	07921524207	
<b>Which best describes your organisation?</b>	<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 type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input checked="" 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.

**Please express your views in the right-hand side of the table below, including your rationale.**

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the Original solution better facilitates: Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
Click or tap here to enter text.		
2	Do you support the proposed implementation approach? (see pages 59-61)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
3	Do you have any other comments?	

Each of the proposals better facilitates the Applicable Objectives than the existing arrangements. The problem that arises is that approach the issue of the extensive queue through solely looking at the position of projects seeking transmission connections fails, in our view, to take into account the contribution that could or should be made by community projects being developed at the distribution level.

If the threshold for the statement of works process (Reserved Developer Capacity or Distribution Forecasted Transmission Capacity) for projects owned by community interest companies, for example, were raised from 1MW to 5-6MW, then a limited number of those projects could be developed which could alleviate the pressure on the transmission system and support the interests of consumers through directly benefitting the communities in which those projects would be located.

As a number of those projects would use onshore wind turbines, they would also be using the generation technology that has the lowest levelized cost of electricity, which again should be to the consumer's overall benefit.

For these reasons we do not consider that the proposals are in the best interests

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 <a href="#">Workgroup Consultation Section</a> ) <input checked="" type="checkbox"/> No
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Click or tap here to enter text.

### Specific Workgroup Consultation questions

5	Do you agree with the elements of the proposed solution? Element 7 has been de-scoped and Element 10 is proposed to be codified within the STC through modification <a href="#">CM095</a> . Please provide rationale for your answer and any suggestions for improvement to each element?
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<b>Element 1:</b> Proposed Authority approved methodologies and ESO guidance (see pages 9-10, 55)	<input type="checkbox"/> Yes <input type="checkbox"/> No
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Click or tap here to enter text.

<p><b>Element 2:</b> Introducing an annual application window and two formal gates, which are known as Gate 1 and Gate 2 (i.e. the Primary Process) (see pages 11, 35-36)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 3:</b> Clarifying which projects go through the Primary Process (see pages 11-12, 35-36)</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>
<p>For community groups operating typically as a CIC, Embedded Small Power Stations Thresholds: England and Wales the lower limit should be 5 or 6MW -not 1MW. This would permit a limited number of those projects to be developed which could alleviate the pressure on the transmission system and support the interests of consumers. These single small sites are below the level of interest of the larger proposers.</p>	
<p><b>Element 4:</b> Significant Modification Applications concept, including the proposed criteria and the proposed level of codification (see pages 12-13, 36-39)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 5:</b> Clarifying any Primary Process differences for customer groups (see pages 13-14, 35-36)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 6:</b> Setting out the process and criteria in relation to Application Windows and Gate 1, including introducing an offshore Letter of Authority equivalent as a Gate 1 application window entry requirement for offshore projects (see pages 15-16, 39-40)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 7:</b> Fast Track Disagreement Resolution Process (de scoped from this modification – see pages 16, 58)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 8:</b> Longstop Date for Gate 1 Agreements (see pages 16, 40-41)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 9:</b> Project Designation (see pages 17-18, 48-49)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	

<p><b>Element 10:</b> Connection Point and Capacity Reservation (proposed to not be codified within the CUSC, but is intended to be codified within the STC through modification <a href="#">CM095</a> – see pages 18-20 and the <a href="#">CM095 Workgroup Consultation</a>, pages 6-10)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 11:</b> 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 20-24, 42-46)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 12:</b> Setting out the general arrangements in relation to Gate 2 (see pages 25-26, 47)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 13:</b> Gate 2 Criteria Evidence Assessment (see pages 26-27, 47-48)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 14:</b> Gate 2 Offer and Project Site Location Change (see pages 28, 46)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 15:</b> Changing the offer and acceptance timescales to align with the Primary Process timescales (e.g. a move away from three months for making licenced offers) (see pages 29, 42-46)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 16:</b> Introducing the proposed Connections Network Design Methodology (CNDM) (see pages 29, 53-55)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>Click or tap here to enter text.</p>	
<p><b>Element 17:</b> Introducing the concept of a Distribution Forecasted Transmission Capacity (DFTC) submission process for Distribution Network Operators (DNOs) and transmission connected Independent Distribution Network Operators (iDNOs) to forecast capacity on an anticipatory basis for Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations aligned to the Gate 1 Application Window (see pages 30-33, 51-53)</p>	<p>XYes  <input type="checkbox"/> No</p>

The threshold for Reserved Developer Capacity or Distribution Forecasted Transmission Capacity for projects owned by CIC (Community Interest Companies) or equivalent, should be raised from 1MW to 6MW, to allow a limited number of those projects to be developed which could alleviate the pressure on the transmission system and support the interests of consumers through directly benefitting the communities in which those small projects would be located.

These <6MW sites are not of interest to the larger developers as they would be single wind turbines for example.-Only communities who have a direct and local interest would be able to develop them. If the threshold was not increased a limited, but locally significant number of sites will not be developed and not contribute to net zero.

As a number of those projects would use onshore wind turbines, they would also be using the generation technology that has the lowest levelised cost of electricity, which again should be to the consumer's overall benefit.

[Click or tap here to enter text.](#)

**Element 18:** Set out the process for how DNOs and transmission connected iDNOs notify the ESO of Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations which meet Gate 2 criteria (see pages 33-34, 51-53)

Yes  
 No

Current lower limit TIA process is (England and Wales) 1MW, This is unnecessarily restrictive of small community typically CIC- owned projects. This limit is out of date, having been an arbitrary threshold when a 1MW local project was a big one for a community. Times have changed. Onshore turbines at 1MW are very much less likely to be financially viable in an unsubsidised market. Most onshore turbines available are 4-5MW, which when correctly sited are financially viable in an unsubsidised market. Community led and -owned projects, typically CIC-owned should be permitted to proceed under a threshold of 6MW, not to have to go through a Stage 2 process.

6 Are there any elements of the proposal which you believe should not be included as part of this proposed solution, which the Proposer believes represents the 'Minimum Viable Product' reforms required to the connections process? If not, why not? (Please note the element number in each of your responses if applicable)

Yes  
 No

Click or tap here to enter text.	
7	<p>As per question 6, are there any additional features which you believe should be included as part of Minimum Viable Product reform to the connections process?</p> <p>XYes  <input type="checkbox"/> No</p>
<p>There needs to be consideration of the small community-led and community-owned sector. This is a niche which is locally important but not significant compared with large power station generation. Such projects can attract high local community support and can proceed to be constructed relatively rapidly, contributing to early wins for net zero.</p>	
8	<p>Do you agree that the Gate 1 process should be a mandatory process step, or do you think Gate 1 should be an optional process step with projects being able to apply straight into the Gate 2 process if the project meets both the relevant Gate 2 and Gate 1 criteria?</p> <p>XYes  <input type="checkbox"/> No</p>
Click or tap here to enter text.	
9	<p>Do you believe that the proposed Gate 1 and Gate 2 process could duly or unduly discriminate against any types of projects? If so, do you believe this is</p> <p>XYes  <input type="checkbox"/> No</p>
<p>Community-led and CIC or equivalent-owned project developers have typically limited technical and financial development resource. A TIA process threshold of 6MW would enable a number of such projects to proceed, giving local significance while alleviating pressure on the transmission system, and reducing work for DNO &amp; TNO hard-pressed teams who would more profitably work on large power station projects. It would also support the interests of consumers through directly benefitting the communities in which those projects would be located.</p>	

10	Please provide your views on the proposed options ((a) to (e) on page 45) to mitigate the risk of requiring a developer to submit their application for planning consent earlier than they would in their development cycle (with the risk this consent could expire and any extension from the Planning Authority is not	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
11	Do you agree that DFTC should be included as part of CMP434? If not, do you believe that the reformed connections process can function without DFTC? Please justify your answer. (see pages 30-34, 51-53)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
12	The Proposer intends to set out supporting arrangements for TMO4+ via a combination of guidance and methodologies (e.g. DFTC, CNDM, Project Designation, Gate 2 Criteria). Do you anticipate any issues with having these outside of Code Governance? (see Pages 9-10, 55)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		