

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 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:	Anne-claire Leydier	
Company name:	UK Power Distribution	
Email address:	anneclaireleydier@ukpowerdistribution.co.uk	
Phone number:	07842310055	
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 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 checked="" 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? In light of the short deadline, and because some material is of stronger relevance to other categories of stakeholders, we limit our response to questions relating to elements 17 and 18, and to Question 11 only.
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 checked="" 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? Element 7 has been de-scoped and 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 pages 9-10, 55) <input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	

<p>Element 2: 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 type="checkbox"/>Yes <input type="checkbox"/>No</p>
<p>n/a</p>	
<p>Element 3: Clarifying which projects go through the Primary Process (see pages 11-12, 35-36)</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>
<p>n/a</p>	
<p>Element 4: 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>n/a.</p>	
<p>Element 5: 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>n/a.</p>	
<p>Element 6: 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 type="checkbox"/>Yes <input type="checkbox"/>No</p>
<p>n/a.</p>	
<p>Element 7: 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>n/a.</p>	
<p>Element 8: Longstop Date for Gate 1 Agreements (see pages 16, 40-41)</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>
<p>n/a.</p>	
<p>Element 9: Project Designation (see pages 17-18, 48-49)</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>
<p>n/a.</p>	
<p>Element 10: Connection Point and Capacity Reservation (proposed to not be codified within the CUSC, but is intended to be codified within the STC through modification CM095 – see pages 18-20 and the CM095 Workgroup Consultation, pages 6-10)</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>
<p>n/a.</p>	
<p>Element 11: Setting out the criteria for demonstrating Gate 2 has been achieved and setting out the</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>

obligations imposed once Gate 2 has been achieved (see pages 20-24, 42-46)	
Click or tap here to enter text.	
Element 12: Setting out the general arrangements in relation to Gate 2 (see pages 25-26, 47)	<input type="checkbox"/> Yes <input type="checkbox"/> No
n/a.	
Element 13: Gate 2 Criteria Evidence Assessment (see pages 26-27, 47-48)	<input type="checkbox"/> Yes <input type="checkbox"/> No
n/a.	
Element 14: Gate 2 Offer and Project Site Location Change (see pages 28, 46)	<input type="checkbox"/> Yes <input type="checkbox"/> No
n/a.	
Element 15: 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)	<input type="checkbox"/> Yes <input type="checkbox"/> No
n/a.	
Element 16: Introducing the proposed Connections Network Design Methodology (CNDM) (see pages 29, 53-55)	<input type="checkbox"/> Yes <input type="checkbox"/> No
n/a.	
Element 17: 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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>We agree with the concept of DFTC, and think it may in fact address some of the issues we face with our generation connection applications: Generation is often an afterthought, though quite predictable for some types of site. We are doing a lot of work with our customers to make sure they apply as early as possible, but some hurdles remain: Generation is promoted by parties which are different from those applying at initial POC application stage with the DNO; Also, G99 application necessitates to know exactly what solar PV will be installed (i.e. manufacturer, etc...) when at the stage of POC application, that is often not known, The DFTC process could help address this issue by allowing for an application to be “considered” before all its details are decided between the landlord, the tenant, the energy consultant, etc...</p> <p>It is important that DNOs build their forecast based on customer engagement. The Change proposal mentions “best endeavours to create a reasonable DFTC” , and we think this does not offer enough guarantee that the IDNOs will be consulted. There is a risk that our knowledge of the sites is not taken into</p>	

	<p>account, and we are looking for assurance to mitigate the risk so our customers can benefit from the purpose of the reform.</p>	
	<p>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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>On a practical level, it would be effective to allow for the ESO to invoice the applicant directly for the application fee. This would avoid recharging having to take place, the worst case scenario being for an IDNO customer application: the ESO would charge the DNO, who would charge the IDNO, who then charges the applicant. This does not create any value, but mobilises resources.</p> <p>It would also be useful to have visibility on the value of the fee as soon as possible.</p>	
<p>6</p>	<p>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)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>7</p>	<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><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>8</p>	<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</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

	the project meets both the relevant Gate 2 and Gate 1 criteria?	
Click or tap here to enter text.		
9	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 justified?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
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 automatic).	<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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
We think the concept certainly needs to be included in it, but agree some details can feature outside of scope, but still be tied to a deadline and an engagement process. Up to now, the development of DFTC has been lead by the ENA, without industry consultation, and this should not be the case going forward: there should be a clear plan for consultation and finalisation laid out as soon as possible.		
12	The Proposer intends to set out supporting arrangements for TMO4+ via a combination of guidance and methodologies (e.g. DFTC, CNDM, Project	<input type="checkbox"/> Yes <input type="checkbox"/> No

<p>Designation, Gate 2 Criteria). Do you anticipate any issues with having these outside of Code Governance? (see Pages 9-10, 55)</p>	
<p>Click or tap here to enter text.</p>	