

Public

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:	Zivanayi Musanhi	
Company name:	UK Power Networks	
Email address:	zivanayi.musanhi@ukpowernetworks.co.uk	
Phone number:	07875111989	
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*)

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

Public

- 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 checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM2	<input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM3	<input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM4	<input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM5	<input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM6	<input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM7	<input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d
		We believe that all solutions better facilitate ACO (a) as it will promote aggregated processing of connection applications by the Licensee. This will reduce the volume of individual connection applications received by the Licensee enabling a more efficient connections process. All solutions better facilitate ACO (b) as they enable different generation schemes to connect to the network quicker which helps facilitate competition in the electricity market driving down costs for the end consumer whilst decarbonising the	

Public

		electricity system. All solutions better facilitate ACO (d) as batched applications within application windows will drive a more efficient transmission assessment process leading to earlier connection dates.
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/> Original</p> <p><input 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>We consider the original solution to be more preferable.</p> <p>With regards to WACM1, we believe that the current CUSC definitions for thresholds (which have an inherent link with the Grid Code) should remain as both Codes are there to support/be complementary to each other.</p> <p>We understand and support the WACM2 endeavour to require DNOs to submit Relevant Embedded Power Stations that have met Gate 2 Criteria within the Gate 2 Window that the criteria is met, however it is our view that the CUSC is not the right place to place such an obligation on DNOs.</p> <p>Whilst we understand the rationale behind WACM3, this is covered by the Connections Network Design Methodology (CNDM). We believe that this is sufficient as it is the right place to provide such detail with the appropriate level of governance.</p> <p>We understand the rationale behind Red Line Boundary restrictions proposed by WACM4 but believe that these should be defined in a methodology document rather than in the CUSC as we believe it to have the appropriate level of</p>

Public

		<p>governance in a fast-paced industry that requires agile processes.</p> <p>We believe Project Designation is necessary (within appropriate bounds) as it will enable projects required to meet system needs to connect to the network earlier ensuring alignment of connections with strategic network development which facilitates a safe and reliable electricity network.</p> <p>We believe methodologies as set out in the Original Solution have an appropriate level of governance, hence negates the need for WACM6. Furthermore, we do not believe it is appropriate to codify WACM6 as CUSC parties can raise a separate Code Modification to achieve this as and when required.</p> <p>WACM7 can encourage speculative applications which are then withdrawn following Gate 2 Application competency. We believe the Original Solution will better facilitate the CUSC Objectives as it will ensure that the projects applying for Gate 2 plan to proceed forward towards a connection to the network.</p>
3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>We consider the proposed implementation approach to be reasonable and quite ambitious. We support it due to the connection challenges faced across GB. However, for the proposed approach to deliver successfully, it will be essential for each party to fulfil their duties in each step on time and to the required quality for subsequent steps to be executed successfully. This will be important as any delays will very likely impact customer experience and/or project viability – putting the delivery of connections reform at risk. It should also be an embedded principle that one party's ability to demonstrate compliance with the modified CUSC should not be put at risk by another party's performance.</p> <p>We also believe that there is need for clarity around some of the transitional arrangements at the earliest possible opportunity as this change will have a big impact on customers.</p>

Public

4	Do you have any other comments?	We support the driver behind the CMP434 proposal as it addresses the issues that stakeholders have been highlighting as posing challenges for them regarding the connections process.
5	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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		To the best of our knowledge, we do not believe it has any direct impacts on the Electricity Balancing Regulation (EBR) Article 18 as it does not seek to change any existing Balancing Services.