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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:	Laura Henry	
Company name:	National Grid Electricity Distribution (NGED)	
Email address:	Laura.henry@nationalgrid.com	
Phone number:	07970333738	
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:

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- 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*
- 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 checked="" type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM1 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input checked="" type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM2 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input checked="" type="checkbox"/> c <input type="checkbox"/> d
		WACM3 <input checked="" type="checkbox"/> a <input type="checkbox"/> b <input checked="" type="checkbox"/> c <input type="checkbox"/> d
		WACM4 <input checked="" type="checkbox"/> a <input type="checkbox"/> b <input checked="" type="checkbox"/> c <input type="checkbox"/> d
		WACM5 <input checked="" type="checkbox"/> a <input type="checkbox"/> b <input checked="" type="checkbox"/> c <input type="checkbox"/> d
		WACM6 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input checked="" type="checkbox"/> c <input checked="" type="checkbox"/> d
		WACM7 <input checked="" type="checkbox"/> a <input checked="" type="checkbox"/> b <input checked="" type="checkbox"/> c <input type="checkbox"/> d
Click or tap here to enter text.		
2	Do you have a preferred proposed solution?	<input checked="" type="checkbox"/> Original <input type="checkbox"/> WACM1 <input type="checkbox"/> WACM2 <input type="checkbox"/> WACM3

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		<input type="checkbox"/> WACM4 <input type="checkbox"/> WACM5 <input type="checkbox"/> WACM6 <input type="checkbox"/> WACM7 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		Click or tap here to enter text.
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>We support the implementation approach for CMP434, provided that Distribution Network Operators have enough notice that the window is going to open and that the Modification Notice process for Bilateral Embedded Generator Agreements (BEGAs) is clear in relation to timescales for what can and cannot be achieved during the next application Window.</p>
4	Do you have any other comments?	<p>Overall, NGED is supportive of CMP434, however, we have several concerns with how the Code modification is currently drafted, particularly in relation to the BEGA/Modification Notice process. Please see below for further information in relation to this.</p> <p>NGED cannot support several of the Work Group Alternatives (WACMs) due to the implications that they would have for embedded projects. More details on this are provided below.</p> <p>There are also several sections in the Legal Text which need further defining/alignment for embedded projects.</p> <p>The BEGA process needs to be clearer in Elements 2, 3, and 5 in relation to how the process will work for BEGA applications. The elements refer to the fact that the subsequent DNO Modification application will be submitted in the Gated application window rather than a gated application window which could allude to a Modification Application being required in the next Gated Application window. DNOs will use reasonable endeavours to make sure that, where possible, a</p>

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		<p>Modification Application is submitted in the next window. However, there will be a number of situations and scenarios where this will not be possible: for instance, if a Modification Notice is received towards the end of a window. It is also not clear how the 5 Working Day /15 Working Day process for DNOs works for the Modification Application Process following a Modification Notice. We ask that the NESO clarifies at what point in this process the DNO is expected to submit the Modification Application.</p> <p>In Element 10 (Connection Point and Capacity Reservation), it is not clear if DNOs can take part in this process. We ask that the proposal confirms if there will be a section on the self-declaration form where customers can request to be considered for capacity reservation. If embedded customers cannot take part in element 10, then there is a risk that embedded customers will not have the same opportunities as directly connected transmission parties to access capacity. We assume DNOs cannot take part as capacity reservation is realised through gate 1, which distribution customers cannot access. This means there is a risk, particularly for embedded onshore wind CP30 targets, that the technology does not exist and is not reserved in the areas that is most suitable for wind. This would suggest that policy intervention is necessary to allow capacity reservation at GSPs which lend themselves to wind, being in close proximity to suitable land. We would ask that NESO considers their position on this.</p> <p>In Element 11, section 11.3 (Ongoing Gate 2 Compliance – Land Requirements), we would welcome clarification on how this process will work for DNO customers. Is it assumed that they will not be expected to follow this process and that the ENA Allowable Changes guidance, which is already used at DNO level, will be used instead? We also ask if it is expected that there will be ongoing checks at DNO level for the Gate 2 compliance, as this is not clear in the document. Given that DNOs already follow a published allowable changes process we would not be looking to do anything different in this area.</p>
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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?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>