

**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>	Michelle MacDonald Sandison	
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<b>Phone number:</b>	01738 342183	
<b>Which best describes your organisation?</b>	<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 checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
SSEN Distribution believe the Original proposal better facilitates objectives A, B and D because it will significantly amend the current connections process to a state where projects that are ready to connect, can connect. We also believe the Original will promote efficiency in the implementation of CUSC arrangements as it is currently the most efficient way to achieve the aims of this modification.		
2	Do you support the proposed implementation approach? (see pages 59-61)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>We do not support the proposed implementation approach as described in the workgroup consultation. The Original proposal presented highlights a significant improvement to the connections process compared to the Baseline. We believe there are a number of historic issues with the current process and are very supportive of the industry work to rewrite this process into something more efficient for viable projects to connect.</p> <p>However, we believe the timeline for implementation to be overly ambitious for the quantity of work required to reform the connections landscape to ensure successful implementation of change. The implementation date should be extended to allow connections customers who require a suitable longer timeframe to adjust to the new requirements required of this Proposal, ensure readiness by regulated organisations to manage new processes, as well as to ensure the code and licence changes are thoroughly developed and ready to implement.</p> <p>We understand that the current implementation date is aligned to the commitments made under the ESO RIIO T2 BP2 business plan, however ongoing conversations around the impact of TMO4+ as currently proposed need to be continued to ensure delivery is mapped to successful impact and implementation, acknowledges challenges and complexity of the code modification and industry engagement, political landscape change and continue growth of the connections queue. We would recommend an implementation date that is aligned to being able to incorporate the additional concepts being discussed, such as CP2030 and alignment of the TMO4+ process with FES and SSEP to support delivery of CP2030, to enable a fully formed solution that delivers a more needs-based approach to connections that is also strategic and enduring. We do not believe a staged approach that requires connections customers to have to “re-apply” or have their projects re-</p>		

	assessed for different requirements a number of times as part of the implementation of such a large change to the process will be efficient for both developers and network companies alike.	
3	Do you have any other comments?	
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
	No – not at this stage based on the content of the current consultation. However, we assume that if the TMO4+ process is to change from what is proposed, and incorporate additional concepts relating to CP2030, there will be a further industry consultation on the fully formed solution.	

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?	
	<b>Element 1:</b> Proposed Authority approved methodologies and ESO guidance (see pages 9-10, 55)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	<p>SSEN Distribution is supportive of codifying the high-level concepts and principles of methodologies and guidance, with the details of these concepts being held outside of the CUSC. By keeping the detail outside of the CUSC, the ESO will have the ability to make amendments to respond to changing industry requirements in a more efficient timescale than if these concepts were fully codified.</p> <p>We consider one of the key reasons the electricity connections process has become so stagnated is due to the codes and regulations not keeping pace with the changes in industry, by keeping the detail outside of the code, it allows industry the option to tweak over time, in order to keep pace with what's happening within the industry.</p> <p>We recognise the defined consultation process the ESO has proposed and support this, as it gives industry appropriate time to review and comment on amendments to the proposed methodology.</p> <p>To clarify, we believe it is vital the principles of the concepts are codified, with additional detail being held outside of the CUSC including the governance process associated with the change to methodologies and guidance as the ESO should not and cannot be the author and also the approver, especially as impact shall be felt by other regulated organisations and customers. Consideration should be given on the roles to be played by other regulated organisations, such as DNOs who are not included/list on the modification proposal as a party that shall be involved with the Connections Network Design Methodology development. Clarity is required on the principles and framework for changes or alternatives to be proposed by other parties.</p>	

<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>SSEN Distribution is supportive of the annual application window and two formal gates process proposed in this modification.</p> <p>We agree there is benefit in the Gate 1 process to allow a space for projects to prepare their applications for Gate 2, allowing network owners and operators the space to focus on connecting Users who have met the Gate 2 criteria.</p> <p>We are not fully supportive that User Commitment / Securities do not apply at this stage. We believe there is a need for a financial instrument to apply to Gate 1 projects, to recognise the commitment required of significant transmission works.</p> <p>We recognise developers may see struggle to see a benefit in the Gate 1 process. As a Network Operator, we believe Gate 1 has the potential to increase the visibility of projects looking to connect to the electricity network (mentioned below in Question 8). However, we want to highlight that if the ESO and TO's are not utilising the information gathered during Gate 1 to inform any potential anticipatory investment, then we are unsure of the value added by Gate 1. We would like to recommend that ESO must develop some targets/KPIs that allow a review of the value and impact of gate 1 to confirm the justification provided to introduce this step.</p> <p>SSEN firmly believes DNOs require the ability to manage projects connecting to their network, therefore the concept of DFTC is vital to allow projects to connect to the network without significant delays. Without DFTC, the number of projects able to connect would be significantly reduced, as timescales associated with the windows would act as a blocker and unnecessary delays to some of the Distribution projects.</p>	
<p><b>Element 3:</b> Clarifying which projects go through the Primary Process (see pages 11-12, 35-36)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>We are concerned about small and medium embedded users going through the primary process if DFTC is not codified and the principles acknowledged as part of the Connections Process to manage impact of unnecessary additional requirements for these connections projects that may act as blocker to the timely and successful delivery of these projects. Therefore, if DFTC is not codified, it is our view that small and medium embedded users should be excluded from the primary process and clear allowances made for DNOs to manage their connection projects within the headroom/technical limits at the relevant GSPs.</p> <p>Where DFTC is codified (either in CUSC or Grid Code), we are supportive of small and medium embedded users going through the primary process.</p> <p>We understand the rationale for Large Embedded Generators going through the Primary process, and are overall supportive, although do remain concerned about the impact on our North of Scotland region given the low threshold for 'Large' (10MW).</p> <p>We are also unclear on the reasons why Embedded Demand is not in scope for the proposed TMO4+ process when large demand has been included. This will create confusion around how embedded demand will be treated going forwards and what process it will follow.</p>	

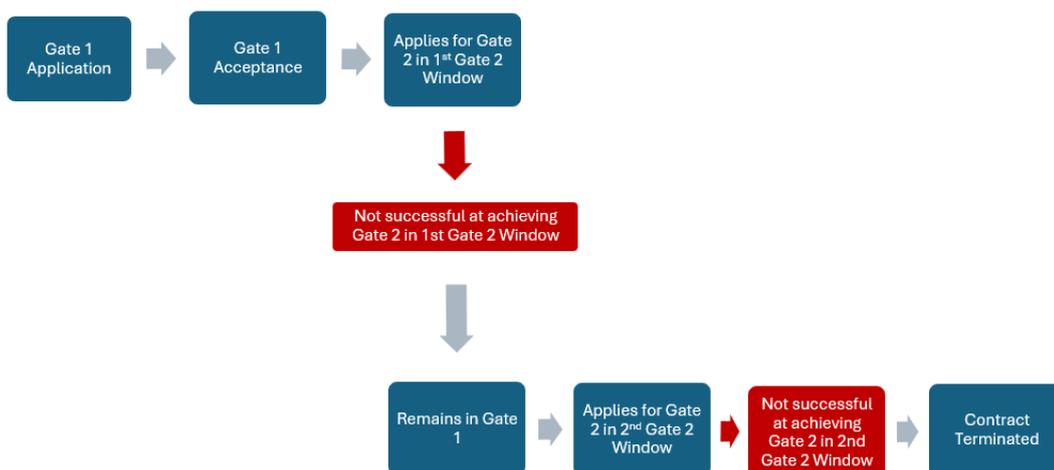
<p><b>Element 4:</b> Significant Modification Applications concept, including the proposed criteria and the proposed level of codification (see pages 12-13, 36-39)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>SSEN Distribution support the concept of implementing ‘Significant Modification Applications’ as part of this proposal. We believe that where a change is not significant, the project is able to make those amendments without the time delay of the Primary Process. We also believe that where a change requested impacts the design, operation, or other users of the transmission system, this should be deemed ‘significant’ and must go through the primary process.</p> <p>We do believe this needs to be codified and it needs to be made clear what the specific criteria are and ensure alignment between transmission and distribution.</p>	
<p><b>Element 5:</b> Clarifying any Primary Process differences for customer groups (see pages 13-14, 35-36)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>SSEN Distribution consider that Relevant Embedded Small Power Stations and Relevant Embedded Medium Power Station Projects should be treated differently than directly connected transmission projects, and large embedded distribution projects. This is primarily due to their size, which is smaller and typically more agile than larger projects. Therefore, to include them in the primary process would be detrimental to their overall connections experience.</p> <p>The concept of DFTC should be codified, but would prefer this to be incorporated in Grid Code rather than CUSC.</p> <p>SSEN also agrees that Offshore Projects should be treated differently to onshore projects.</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>We are supportive of the introduction of application windows. We believe there is potential merit in the Gate 1 process, however more detail is required on the value added by Gate 1 to ensure its creation has a benefit to network operators/owners and developers.</p> <p>SSEN believe the Gate 1 process should be treated equivalent to a pre-application process, and only once a project has merit should it progress to Gate 2 to connect.</p>	
<p><b>Element 7:</b> Fast Track Disagreement Resolution Process (de scoped from this modification – see pages 16, 58)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>SSEN agree with this being descoped, so long as any disputes are dealt with in line with CUSC Section 7 – CUSC Dispute Resolution until a more defined dispute process is developed.</p>	
<p><b>Element 8:</b> Longstop Date for Gate 1 Agreements (see pages 16, 40-41)</p>	<p><input checked="" type="checkbox"/> Yes</p>

No

SSEN Distribution is supportive of introducing back stop dates into Gate 1 Agreements, however we have concerns that 3 years is too long for the longstop date and without the presence of a financial instrument at the Gate 1 stage there is a lack of incentive for projects to adequately progress. This could lead to an inflated view of the future connections queue and impact upon anticipatory investment decisions. We also have concerns that the longstop date can be extended by the ESO. CUSC connection agreements already contain a “backstop date” that is frequently ignored and arbitrarily moved back, what controls and processes are in place to ensure the longstop date is not treated in the same way. The risk associated with the current approach is that the Gate 1 “queue” will be as big or bigger than the current queue, as of August 2024, due to the ease of entry and retention of the contract.

As an alternative to the proposed backstop date of 3 years, SSEN Distribution propose a link to the Gate 2 application windows. If a project does not move from Gate 1 to Gate 2 within the next two Gate 2 application cycles following acceptance of a Gate 1 offer, then that project should be terminated and must reapply.

We have illustrated our proposal in the below image, to help visualise the process we are suggesting.



SSEN would like to seek clarification from the ESO around whether a cool-off period applies following a project being rejected from compliance with Gate 2 criteria. If this leads to their Gate 1 offer being cancelled, can they automatically apply in the next window, or do they have to miss an application cycle.

**Element 9: Project Designation (see pages 17-18, 48-49)**

Yes

No

SSEN are supportive of the introduction of Project Designation, however as noted on Element 6 of this paper, is imperative that there is a clear governance and control in place to ensure ESO are not placed in a position of power where only projects that are of interest to ESO are progressed at detriment of Distribution System projects that are supportive of the economic, efficient, coordinated and resilient management of the Distribution Network, delivery of Local Energy Plans, economic development of communities and decentralised (non-transmission) generation capability.

<p>SSEN believe that it would be relevant to create the same connect of Project Designation at Distribution Level via DCUSA Code modification to ensure alignment and parity of treatment of connection projects across Transmission and Distribution, as ESO are only CUSC (transmission connections) code administrator.</p> <p>This should then drive changes to the connections process at Distribution to once more ensure relevant gates and steps are used at Distribution to prevent Distribution Network Operators processes from being misaligned with Transmission.</p> <p>The lack of clarity around what would be included in such a methodology highlights a risk to SSEN Distribution that this proposal could detrimentally impact distribution embedded users. We are also concerned that due to the detail being kept outside of the Code, users will not be given adequate opportunity to comment and provide alternative views. The criteria identified in the Proposal relating to critical to security of supply or system operation is incredibly subjective, and therefore leaves open the opportunity for users to be disadvantaged.</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 <a href="https://www.nationalgrideso.com/document/322801/download">https://www.nationalgrideso.com/document/322801/download</a>)</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p>
<p>SSEN has concern around the impact of the capacity reservation on developers, both Transmission connected and embedded. This process allows the ESO to prioritise bay allocation to projects which are potentially not ‘shovel ready’ and able to connect at pace. This then allows for delays to projects who have met the Gate 2 criteria.</p> <p>Any such option would also have to be time bounded and reported on, ensuring that treatment is as fair as possible, as reservation of bays for perpetuity won’t necessarily represent value for consumers and contrarily may delay build of schemes that are of value to DNOs.</p> <p>Option for same concept under same principles should be introduced to distribution.</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 checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>SSEN Distribution are overall supportive of the criteria to demonstrate Gate 2 requirement compliance, however as noted above we don’t believe Gate 2 goes far enough. We believe there should be allowance beyond the statement of HND and Interconnectors, and to the proposal needs to be mindful of future government led initiatives or policies, such as CP2030.</p> <p>We support that Gate 2 should have defined criteria. We believe setting that criteria is vital to the reformed connections process working effectively.</p> <p>However, we are concerned that the criteria suggested in the Proposal (which will not be codified, therefore there is still the opportunity to amend) is not strong enough to make a considerable impact on the current connections queue.</p>	

<p>The criteria being proposed is too easy to achieve for developers, and still does not go far enough to show intent to connect. We also struggle to support the proposed change to the calculation of the queue management milestones, as this has been developed to be reflective of the challenges to development of transmission and distribution projects when there is a dependency from transmission works. If and when transmission connection dates are improved dates for M2 will improve to be reflective of more demanding timescales.</p> <p>We also believe the land requirements associated with building outside the land boundary seems to be over complicating the management of change. Developers should only lose capacity if a change to the red line boundary has an impact/constitutes a material change to the design/connection solution. Based on the proposal presented, we believe this is a proposal that will prove hard to police and one that could detrimentally impact projects unnecessarily when the actual connection solution and design doesn't change.</p> <p>We agree that there should be minor differences for Offshore Wind, Offshore Hybrid Assets and Interconnectors to reflect the differing nature of these projects.</p> <p>We support that there should be ongoing compliance once a project has entered into a Gate 2 contract. SSEN believes this should be managed by queue management and that the M1 Queue Management milestone should be amended to be forward looking to incentivise developers to move towards connection promptly.</p>	
<p><b>Element 12: Setting out the general arrangements in relation to Gate 2 (see pages 25-26, 47)</b></p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
<p>SSEN Distribution supports the need for Gate 2, we believe this is a positive concept to differentiate projects that are ready to connect versus projects that are still in the early scoping stages.</p> <p>We understand the frequency of Gate 2 windows is still to be determined, and therefore would like to highlight an issue we have identified with the current indicative process of three Gate 2 windows as shown in Annex 4. There is a risk the second Gate 2 window in a calendar year would not deliver the value that is currently anticipated. This is due to the overlap of the 1st Gate 2 window acceptance period with the 2nd Gate 2 Process and TOCO period. Due to the 1st Gate 2 process having not yet concluded (i.e. customers can still accept their Gate 2), we do not believe the 2nd window would have any additional value for customers, as the ESO and the TO would not yet have a confirmed contracted background on which to base their 2nd Gate 2 window applications. Two Gate 2 windows would be more appropriate, to ensure the 1st Gate 2 application process had fully concluded before beginning the second process, to ensure that the contracted background was fully reflective of the contractual positions.</p> <p>We are supportive of the general terms relating to Gate 2. As a DNO, SSEN agrees that DNOs and transmission connected IDNOs should assess that Relevant Embedded Small or a Medium Power Station customers have met their Gate 2 criteria, and submit this to the ESO during the following Gate 2 window.</p>	
<p><b>Element 13: Gate 2 Criteria Evidence Assessment (see pages 26-27, 47-48)</b></p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>

<p>As highlighted in Element 11, SSEN Distribution has concerns that the information required to achieve Gate 2 is very low. We continue to support a review to raise the threshold a project will need to meet in order to meet Gate 2.</p> <p>Irrespective of that, we are supportive of the indicative Gate 2 Criteria Evidence, based on the current indicative criteria, and are keen for this to be further developed to raise the threshold.</p> <p>We would also like to ensure the guidance around assessing the criteria is robust, to ensure consistency of application.</p> <p>We are in agreement that a template should be used relating to the Self-Declaration Letter, to enable ease of use for developers working across both Transmission and Distribution connections.</p>	
<p><b>Element 14: Gate 2 Offer and Project Site Location Change (see pages 28, 46)</b></p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>
<p>SSEN Distribution has significant concerns around the proposal that developers will be able to move their project site location closer to a connection point offers at Gate 2.</p> <p>We believe the introduction of this concept blurs the line on allowable changes, as in this proposal, the ESO will allow material changes when driven by the ESO, but material changes cannot be driven by the customers.</p> <p>It will be necessary to define the principles on why the ESO would propose a different site location, as we believe this is counterproductive to the purpose of delivering projects to meet Net Zero goals.</p> <p>We are also concerned about the impact a move of site location would have on DNOs, and we believe it is a requirement that this risk is assessed to show the impact on Large embedded generators and other DNO connection projects that are progressing in Gate 2, as this proposal could amend / risk the development and expenditure made to enable the distribution connection.</p> <p>This would also almost negate the requirement for red line boundary if it can be subject to change by ESO.</p> <p>This proposal goes against the ENA guidance on allowable changes which DNO's currently follow. If the ESO wishes this to remain in the proposal, it can only do so with a review of the ENA Allowable Changes policy to ensure embedded customers are not disproportionately impacted.</p> <p>We recognise and agree that all connection points to the network may differ for customers across GB, but we expect the ESO to have the relevant conversations with customers and DNOs to assess the impact of possible changes.</p>	
<p><b>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)</b></p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>SSEN Distribution support this element.</p>	
<p><b>Element 16: Introducing the proposed Connections Network Design Methodology (CNDM) (see pages 29, 53-55)</b></p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

	<p>SSEN Distribution support this element, but it must be made clear within the methodology how this will work for distribution customers.</p> <p>Distribution Network Operators have a role to play in the CNDM, as DNO's currently have individual network development strategies that are communicated to industry via Strategic Development Plans.</p> <p>We believe there is a requirement for a DCUSA modification to reflect the impact to Distribution Customers, to ensure the connection processes are aligned, and that projects can be triaged at the distribution level to avoid customers entering into unnecessary processes when the answer could be supplied on application to DNOs.</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><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>
	<p>SSEN Distribution support this element and as per previously stated as long as the DFTC process is codified.</p>	
	<p><b>Element 18:</b> 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>SSEN Distribution support this element and that the process will continue to mirror the current Project Progression/Transmission Impact Assessment (TIA) process.</p> <p>As SSEN Distribution will be carrying out the checks of Gate 2 compliance, we believe it will be important to set some guidance for embedded customers to advise on timelines required to make it into the Gate 2 application window, to allow for the DNO to review the application and submit it within the window.</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 checked="" type="checkbox"/> No</p>
	<p>SSEN Distribution broadly agree with the concepts set out in the consultation, however as previously advised we don't believe that there should be a staged implementation to the Reform. Referring to the elements in this consultation as an MVP suggest a staged roll out of the reformed process and our</p>	

	view is that the current concepts should be further considered and aligned with the ongoing conversations around CP2030, SSEP and FES and TMO4+ can be adapted to facilitate a process that allows for a needs based approach to connections.
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><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>SSEN Distribution believe that ultimately the reforms need to go further and should facilitate a direct link to strategic network investment and planning making use of the CP2030, SSEP and FES as the starting point to drive a more needs led approach rather than a purely customer driven approach to connections.</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><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>Although SSEN Distribution have concerns around the tangible value of Gate 1 from a developer point of view, we feel Gate 1 should be mandatory as from a Networks perspective it will provide valuable visibility of the potential future connections queue and help to facilitate anticipatory investment decisions.</p>
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 justified?</p> <p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>Our view is that DFTC must be codified so that small and medium embedded users can use the primary process without discrimination.          We would also like to understand, as previously mentioned, why embedded demand is excluded from the primary process.</p>
10	<p>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).</p> <p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>SSEN is supportive of options c, d and e to mitigate the risk of requiring a developer to submit their application for planning consent earlier than they would in their development cycle.</p>

	<p>Option C is reasonable as it ties to providing the developer with more information relative to their connection, therefore allowing them to progress once this information is known.</p> <p>Option D is reasonable as it factors in any delays due to reinforcement of the network.</p> <p>Option E provides a fall back for extension due to any unforeseen delays during the process.</p>	
<p>11</p>	<p>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)</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>SSEN Distribution firmly believes that the reformed connections process does not work without DFTC. This is due to the significantly detrimental impact the Primary Process would have on small and medium embedded customers.</p> <p>If DFTC was to be removed from the Proposal, the only viable option would be to have small and medium embedded customers sit outside the primary process and to follow the current industry practice of transmission impact assessments and project progressions. We do not consider this to be an improvement on the current process to connect customers to the electricity network.</p> <p>However, we believe that the concept of DFTC sits best within the Grid Code, and discussions remain open to make this happen. If DFTC is not included in GC, then concept must be in CMP434.</p> <p>Connections Reform does not work without DFTC, so without the proposed addition to Grid Code, SSEN Distribution support the inclusion of DFTC in the CUSC.</p>
<p>12</p>	<p>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)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>SSEN Distribution agree that detailed guidance and methodologies should sit outside of code. However, we do have concerns around the consistency of application and enforcement of these methodologies not being enshrined in code. It is therefore crucial that the governance and consultation process is clearly defined in order to get the correct level of engagement and input from industry on the content and application of these documents.</p>