Public

Code Administrator Meeting Summary

Workgroup Meeting 1: CMP446 Increasing the lower threshold in England and Wales for Evaluation of Transmission Impact Assessment

Date: 24 January 2025

Contact Details

Chair: Milly Lewis, Milly.Lewis@nationalenergyso.com

Proposer: Martin Cahill, Martin.Cahill1@nationalenergyso.com

Key areas of discussion

The aim of Workgroup meeting 1 was to go through the Proposer's full solution and the Terms of Reference (ToR) assessment.

The Chair talked through key elements of the Modification process including:

- the role and expectations of the Workgroup
- the requirement for Workgroup members to attend 50% of the meetings to be eligible for voting.
- the process of raising and voting on Alternative Requests and their purpose.

The Chair presented the urgent timeline of the Modification, which is in line with the urgency as approved by the Authority, noting that Workgroup meetings are expected to run until March 2025.

Proposer presentation

The Proposer outlined the defect that led to this Modification being raised. The Proposer noted that this Modification only seeks to amend the Transmission Impact Assessments (TIA) threshold for England and Wales.

A Workgroup member questioned why National Grid Electricity Transmission (NGET) were not proposing this modification. The Chair noted that NGET are not a CUSC Schedule 1 User, so are unable to propose a Modification. NESO have therefore proposed the Modification on NGET's behalf.

A Workgroup member requested further information on how the proposed increase to the lower threshold of 5MW had been reached. The Proposer noted that the analysis that was used to

support this increase has been included with the Modification proposal. This analysis can be discussed by the Workgroup at a future meeting.

Scenario testing

Workgroup members discussed several scenarios for new and existing sites in relation to the scope of this Modification, and how they would be treated within the solution, in particular:

- New Generation below the threshold (Plus adding generation)
- New Generation above the threshold
- Existing Generation below the threshold (Plus adding generation)
- Existing Generation above the threshold
- Small Demand adding Generation
- Large Demand adding Generation

NESO agreed to develop a table or flowchart to illustrate various scenarios for new and existing sites under the proposed threshold change to determine how they will be treated under the proposed solution. This will provide clarity and will be reviewed by the Workgroup to help to refine the proposed solution.

Potential Risks and impacts

Workgroup members discussed the following potential risks and impacts of the proposed threshold change:

- The possibility of increased applications - This could lead to a higher volume of projects and potential impacts on the transmission network
- The need for visibility and tracking of sub-5 MW projects to monitor their potential cumulative impact on the transmission network, including whether there should be any action taken if too many sub 5MW projects connect and the cumulative impact is too great
- CP30 alignment - Proposed changes should be aligned with CP30 requirements, ensuring that distribution network operators (DNOS) consider the cumulative impact of sub-5 MW projects and manage applications accordingly
- Risk management strategies will be required to address potential issues arising from the increased threshold

The Proposer took an action to consider the above points for discussion at the next Workgroup meeting. Specifically, to outline the risks to the distribution and transmission networks should there be a change to the thresholds and to consider the interactions of CP30 on the different obligations across parties.

With regards to data presented to illustrate the total England and Wales accepted Distributed Energy Resource (DER) by technology, the Proposer took an action to provide up to date data and further clarity on what the data represents.

Legal text

A Workgroup member noted that scenario testing action to be completed by NESO will also help to test and finalise the proposed legal text by checking whether applying it will achieve the desired outcomes for each scenario.

The Proposer took an action to send out the draft legal text to Workgroup members to review.

Cross-code impact

It was clarified by the Proposer that this Modification is not dependant on CMP434 being approved. Alignment with CMP434 has caused this Modification to have an urgent timeline in order to meet the Gate 2 deadline.

It was noted by a Workgroup member that there may be some cross over between WACM1 of CMP434 and this Modification. It was agreed that this Workgroup will discuss how the legal text would be affected depending on the possible outcomes of CMP434. The Proposer will provide further information on the possible legal text of CMP434 at the next meeting.

The Proposer took an action to develop a Gantt chart with two swim lanes to show the implementation timelines for CMP446 in relation to CMP434 and CMP435, considering different decision outcomes.

The Proposer took an action to keep the Workgroup of Modification GC0139 updated on the progress of this Modification in case there is any cross over.

MW Capacity Definition

The Proposer took an action to clarify the definition of MW capacity, as different terms such as installed capacity, export capacity, and developer capacity are used inconsistently.

Ensuring Fairness

The Workgroup discussed the possibility of threshold codification in Scotland. There was a discussion on whether to codify the existing thresholds in Scotland. It was raised that codifying these thresholds would provide legal clarity and consistency across GB.

The Proposer noted that a further Modification could be raised to codify these thresholds.

The Proposer took an action to provide a clear explanation and documentation on why Scotland is excluded from the defect, including legal, strategic, and practical reasons.

Workgroup members questioned how the proposal would address scenarios where existing sites incrementally increase their capacity. This point will be discussed at the next Workgroup meeting once the scenario testing action has been completed by NESO.

Terms of Reference

It was noted by Workgroup members that items (c) and (j) are both covered by item (c). The Chair took an action to remove item J from the Terms of Reference. There was also a minor amendment to item (i).

Next Steps

The Chair summarised the actions that had been taken during Workgroup 1, confirming that these will be actioned post-meeting.

Actions

For the full action log, click here.

Action Number	Workgroup Raised	Owner	Action	Due by	Status
1	WG1	Martin Cahill	Develop a table or flowchart to illustrate various scenarios for how generators will be treated under the proposed threshold change. This will provide clarity and will be reviewed by the Workgroup to help to refine the proposed solution. To include different MW sized generators, new vs change to capacity, and demand connections with generation attached.	30/01/2025	Open
2	WG1	Martin Cahill	Consider potential future risks and mitigations. for discussion at the next Workgroup meeting. Specifically, to consider: - What work is already in place to assess cumulative impact of smaller generators	30/01/2025	Open

			- Is there a need to be able to roll back increase if too many projects in 1-5MW range apply - What other mitigations are, or will be in place		
3	WG1	Martin Cahill	With regards to data presented to illustrate the total England and Wales accepted DER by technology, the Proposer took an action to provide up to date data and further clarity on what the data represents.	30/01/2025	Open
4	WG1	Martin Cahill	Send out the draft legal text to Workgroup members to review	30/01/2025	Open
5	WG1	Martin Cahill	The Proposer took an action to develop the implementation timelines for CMP446 in relation to CMP434 and CMP435 further, considering different decision outcomes.	30/01/2025	Open
6	WG1	Martin Cahill	The Proposer took an action to keep the Workgroup of Modification GC0139 updated on the progress of this Modification in case there is any cross over.	30/01/2025	Open
7	WG1	Martin Cahill	Clarify the definition of MW capacity to be used, as different terms such as installed capacity, export capacity, and developer capacity are used inconsistently.	30/01/2025	Open
8	WG1	Martin Cahill	Provide a clear explanation and documentation on why Scotland codification is	30/01/2025	Open

			excluded from the defect, including legal, strategic, and practical reasons		
9	WG1	Milly Lewis	The Chair took an action to remove item J from the Terms of Reference. There was also a minor amendment to item (i).	30/01/2025	Open
10	WG1	Martin Cahill	Provide explanation of CP30 interaction at TI and DNO level	30/01/2025	Open

Attendees

Name	Initial	Company	Role
Milly Lewis	ML	NESO Code Administrator	Chair
Kat Higby	KH	NESO Code Administrator	Tech Sec
Martin Cahill	MC	NESO	Proposer
Alex Markham	AM	NESO	NESO Representative
Alison Price	AP	NESO	NESO SME
Andrew Colley	AC	SSE	Alternate
Brian Hoy	BH	Electricity North West	Workgroup Member
Dan Clarke	DC	National Grid Electricity Transmission (NGET)	Workgroup Member
Drew Johnstone	DJ	Northern Powergrid	Workgroup Member
Garth Graham	GG	SSE Generation	Workgroup Member
Grant Rogers	GR	Qualitas Energy	Workgroup Member
Helen Stack	HS	Centrica	Workgroup Member
Jack Purchase	JP	National Grid Electricity Distribution	Workgroup Member
Kate Teubner	KT	Low Carbon	Workgroup Member
Kostas Fouskis	KF	Gridserve	Workgroup Observer
Kyle Smith	KS	Energy Networks Association	Workgroup Observer
Kyran Hanks	KH	WWA	Workgroup Member
Mohammad Bilal	MB	UK Power Networks	Alternate
Nina Sharma	NS	Drax	Workgroup Member
Paul Youngman	PY	Drax	Alternate

Richard Woodward	RW	National Grid Electricity Transmission (NGET)	Alternate
Ross O'Hare	RO	SSEN	Workgroup Member
Zivanayi Musanhi	ZM	UK Power Networks	Workgroup Member