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Code Administrator Consultation Response Proforma

CM095: 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 stcteam@nationalenergyso.com by **5pm** on **24 January 2025**. Please note that any responses received after the deadline or sent to a different email address will not receive due consideration.

If you have any queries on the content of this consultation, please contact stcteam@nationalenergyso.com

Respondent details	Please enter your details	
Respondent name:	Greg Stevenson	
Company name:	SSEN Transmission	
Email address:	Greg.Stevenson@sse.com	
Phone number:	07467 397988	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input 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 checked="" 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*)

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For reference the Applicable STC Objectives are:

- a) *efficient discharge of the obligations imposed upon Transmission Licensees by Transmission Licences and the Electricity Act 1989;*
- b) *efficient discharge of the obligations imposed upon the licensee by the Electricity System Operator licence, the Energy Act 2023 and Electricity Act 1989;*
- c) *development, maintenance, and operation of an efficient, economical, and coordinated system of electricity transmission;*
- d) *facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity;*
- e) *protection of the security and quality of supply and safe operation of the National Electricity Transmission System insofar as it relates to interactions between Transmission Licensees and the licensee*;*
- f) *promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC;*
- g) *facilitation of access to the National Electricity Transmission System for generation not yet connected to the National Electricity Transmission System or Distribution System; and*
- h) *compliance with the Electricity Regulation and any Relevant Legally Binding Decisions of the European Commission and/or the Agency.*

* See Electricity System Operator Licence

Please express your views in the right-hand side of the table below, including your rationale.

Second Code Administrator Consultation questions		
1	Please provide your assessment for the proposed solutions against the following STC Objectives	Mark the Objectives which you believe the proposed solutions better facilitates:
		Original <input checked="" type="checkbox"/> B <input type="checkbox"/> E
		ASM1 <input type="checkbox"/> B <input type="checkbox"/> E
		Original <u>Objective B</u> We believe that the Original Proposal better facilitates Objective B. This proposal should allow NESO to discharge the obligations placed on them by ensuring there are clear obligations and expectations placed on the NESO through the proposed STC changes. This will allow both NESO & Transmission

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		<p>Owners (TOs) to facilitate the reformed connections process proposed under TMO4+ in terms data exchanges and timescales placed on both parties.</p> <p><u>Objective E</u></p> <p>Objective E (Objective D in the first CAC) remains Neutral following the update to the Applicable STC Objectives.</p> <p>ASM1</p> <p>We do not believe ASM1 better facilitates the new Objective B or the amended Objective E when compared to the Original solution.</p> <p>We do not support ASM1 as we feel it introduces inefficiency. We believe that codifying the Methodologies will remove the flexibility and speed of any changes required to improve the new Primary Process. This would lead to less timely and efficient resolution of issues or improvements. We believe that the Original proposal provides a robust governance process, which includes industry consultation and Authority approval.</p>
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/> Original</p> <p><input type="checkbox"/> ASM1</p> <p><input type="checkbox"/> Baseline</p> <p><input type="checkbox"/> No preference</p> <p>The Original solution remains our preferred solution, considering the changes to the Applicable STC Objectives.</p>
<p>Please only answer questions 3 to 5 if you responded to the CM095 first Code Administrator Consultation.</p>		
3	Has your assessment of the Amended STC Objective (e)	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

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	changed? If yes, please provide reasoning	Click or tap here to enter text.
4	For the Original solution, has the New STC Objective (b) and/or the Amended STC Objective (e) changed your assessment of any of the other applicable STC objectives? If yes, please provide reasoning.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.
5	For the ASM1 solution, has the New STC Objective (b) and/or the Amended STC Objective (e) changed your assessment of any of the other applicable STC objectives? If yes, please provide reasoning.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.