

Workgroup 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@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 stcteam@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Graham Pannell	
Company name:	BayWa r.e. UK	
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Phone number:	07823432508	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" 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 STC Objectives are:

- a) *efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act*
- b) *development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission*
- c) *facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity*
- d) *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*

- e) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.
- f) facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;
- g) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.

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:						
		<table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> <td><input type="checkbox"/>F</td> <td><input type="checkbox"/>G</td> </tr> </table>	Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E
Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input type="checkbox"/> G	
<p>We see merit in the proposal, however, in keeping with our response to CMP434: The proposal is entirely without key documentation. Without key documentation on implementation and policy, it is impossible to make meaningful assessment; furthermore, the <i>uncertainty</i> makes this proposal worse than baseline. Without key documentation the proposal cannot be seriously considered for fairness, competence, completeness, nor mitigation against undue discrimination.</p> <p>We would welcome reconsideration when key documentation drafts are published.</p> <p>This proposal has:</p> <ul style="list-style-type: none"> • No CNDM documentation <ul style="list-style-type: none"> ○ No connection sharing detail ○ No queue (re)allocation detail • No Gate 2 Methodology documentation. • No Project Designation Methodology. • No guard-rails of fairness, no agreeable dispute resolution (noting the key documentation is to sit outside CUSC). • No process for staged TEC. <p>A meaningful impact assessment is therefore impossible, and any decision taken by the regulator could be highly susceptible to challenge.</p>								
2	Do you support the proposed implementation approach? (see page 12)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No						
		Click or tap here to enter text.						
3	Do you have any other comments?							

Click or tap here to enter text.	
4	<p>Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?</p> <p><input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section)</p> <p><input checked="" type="checkbox"/> No</p>
Click or tap here to enter text.	

Specific Workgroup Consultation questions	
5	<p>Do you agree with the components of the proposed solution? Please provide rationale for your answer and any suggestions for improvement to each component.</p>
<p>Component A: Proposed Reformed Connections Process and Timescales, including ESO/TO obligations (see pages 5-6)</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>
<p>Broadly supportive of the main concepts, however without seeing a draft of key documentation, it is hard to say whether more of the proposal requires codification. The undetailed general concept alone leaves too high a risk of undue discrimination to be able to offer support (as per our answer to question 1). In general, the criticality of this issue to the value of contracts suggests codification, because of the need for open governance and better holding ESO to account, but we are open to seeing work done to convince us otherwise.</p> <p>Bluntly, the idea of accepting the concept and “<i>don’t worry, we’ll detail it in guidance later</i>” gives no confidence of fairness, competence nor protection against undue discrimination.</p>	
<p>Component B: Connections Network Design Methodology (see pages 6, 8-9)</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>
<p>Broadly supportive of the main concepts, however without seeing a draft of key documentation, it is hard to say whether more of the proposal requires codification. The undetailed general concept alone leaves too high a risk of undue discrimination to be able to offer support (as per our answer to question 1). In general, the criticality of this issue to the value of contracts suggests codification, because of the need for open governance and better holding ESO to account, but we are open to seeing work done to convince us otherwise.</p>	

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	Component C: Connection Point and Capacity Reservation (see pages 6-10)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Broadly agree, noting that such reservations must be transparent, well-justified and clearly communicated.	
6	Do you agree that the Proposer has fully identified the high-level impacts (subject to legal text drafting) on the STC and STCPs as a result of the CMP434 Proposal? If you do not agree, what else do you think is impacted and/or needs to change? (see page 3)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Consultation period too short to meaningfully consider.	
7	In your consideration of the CM095 proposal, are there any potential risks for implementation which might also impact the CMP434 or CMP435/CM096 proposals?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Consultation period too short to meaningfully consider.	