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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:	Richard Woodward	
Company name:	National Grid Electricity Transmission	
Email address:	Richard.Woodward@nationalgrid.com	
Phone number:	Click or tap here to enter text.	
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
		The CM095 solution provides the minimum necessary changes to the STC to facilitate the proposed changes under CUSC via CMP434. In consideration of the revised STC applicable objective B specifically, the full package of reforms applies more proportionate barriers to entry for connections via new User-facing processes in CUSC. This in turn better supports the ability of the network licensees – both Transmission Owner

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		<p>and System Operator - to anticipate and deliver timely, efficient, connections for developer projects.</p> <p>With additional intervention by the System Operator licensee (e.g. Queue Management; Project Designation) to ensure allocated network capacity continues to be utilised where customer projects cannot progress, these proposals should better ensure effective outcomes for the benefit of all stakeholders, including end consumers – better facilitating Objective B.</p> <p>Assessment of ASM1</p> <p>ASM1 provides benefits overall compared to the baseline by deriving substantively from the NESO Original.</p> <p>Our assessment however is that applicable objective B could be negatively impacted via this alternative as it imposes obligations on the System Operator licensee to carry out activities which:</p> <p>i) can either occur through the natural course of business with code obligations, or ii) may not be in STC Party’s or industry’s best interests at a future point in time.</p> <p>Applicable Objective D</p> <p>We assess objective E ‘neutral’ under both original and ASM1 proposals.</p>
2	Do you have a preferred proposed solution?	<input checked="" type="checkbox"/> Original <input type="checkbox"/> ASM1 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
<p>Please only answer questions 3 to 5 if you responded to the <u>CM095 first Code Administrator Consultation</u>.</p>		<p>As flagged above, the Original proposal provides the most efficient route to resolve the underlying defect.</p>

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3	Has your assessment of the Amended STC Objective (e) changed? If yes, please provide reasoning	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		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.