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STC Workgroup Vote

CM095: Implementing Connections Reform

Please note: To participate in any votes, Workgroup members need to have attended at least 50% of meetings.

Terms used in this document

Term	Meaning
Baseline	The current STC (if voting for the Baseline, you believe no modification should be made)
Original	The solution which was firstly proposed by the Proposer of the modification
Alternative STC Modification	An Alternative Solution which has been developed by the Workgroup

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

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Workgroup Vote

To assess the Original and Alternative STC Modifications against the STC objectives compared to the baseline (the current STC).

You will also be asked to provide a statement to be added to the Workgroup Report alongside your vote to assist the reader in understanding the rationale for your vote.

ASO = Applicable STC Objective

ASM = Alternative STC Modifications

“Y” = Yes

“N” = No

“-“ = Neutral

“Abstain”

Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Better facilitates ASO (h)	Overall (Y/N)
Allan Love – Scottish Power Transmission									
Original	Y	Y	Y	-	-	Y	Y	-	Y
ASM1	Y	Y	Y	-	-	Y	Y	-	Y

Voting Statement:

I feel the Original best meets the applicable STC objectives. However, WASTM 1 is entirely dependent on CMP434 WACM 6, which for the avoidance of doubt we support only if CMP434 WACM 6 is chosen by the Authority.

The proposal only facilitates the introduction of the gated process by CMP434, which is required to raise barriers to entry and increase coordination within the network design process. However, most consequential changes sit within the Methodologies.

The proposal must be supported by a comprehensive and progressive STCP (not considered alongside this proposal). The changes associated with facilitating CMP434 do nothing to ease the administrative burden on our teams or address insufficient licence timescales. Instead, a move from a continuous to batched application process risk making this worse unless fully considered and solutions found.

Our evaluation against the applicable STC objectives.

a, Positive: The proposal will introduce a gated process, with a batched network design, that will allow projects to be prioritised based on readiness. This will facilitate the design of a more coordinated system and potentially free up network capacity for projects proven to be progressing helping to deliver Clean Power 2030 and Net Zero ambitions.

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b, Positive: The proposal introduces the gated design process, facilitated through the Connections Network Design Methodology and Project Designation Methodology.

c, Neutral: The proposal facilitates the CMP434 proposal, which introduces the gated process.

d, Neutral.

e, Positive: The introduction of a gated process facilitates higher barriers to entry which will ensure the Network is designed and built for those most ready to connect. The introduction of the Methodologies and additional Guidance is welcome and will add further clarity to the revised connections process.

f, Positive: The proposal facilitates access to the readiest projects through higher barriers to entry, the potential for coordination in connection design and the ability to prioritise/reserve for those projects which could have a high system impact.

g, Neutral.

Post Send Back Voting Statement:

The changes to the Applicable Objectives do not materially change my assessment of the proposal as set out in my original response.

Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Better facilitates ASO (h)	Overall (Y/N)
Anthony Cotton – Green Generation Energy Networks Cymru									
Original	N	N	N	N	N	N	N	N	N
ASM1	N	N	N	N	N	N	N	N	N

Voting Statement:

Whilst I support in principle changes to the connections process and reform of the queue, and fully support the achievement of Clean Power 2030 and the Net Zero ambition, I do not see how the Original or Alternative modification to the Code meets the objectives. This is principally because the key changes of substance are in the Methodologies which are not codified in either the STC or CUSC, rather the changes being voted on would confirm this position. Whilst such changes may be expeditious for future development of the arrangements, and the key features of the Gate 2 Methodology were raised in the working group, other than this, members of the Working Group have had no opportunity to review, discuss or challenge the NESO on the Methodologies. Similarly, there has been little detailed debate on how the new arrangements will impact embedded generation. I consider that there are serious risks to the investment climate for new projects seeking to connect to and use the Transmission System and there has been no quantitative assessment of the costs, benefits and risks associated with this change (or at least none that has been shared with or discussed by the workgroup).

Post Send Back Voting Statement:

No additional statement provided.

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Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Better facilitates ASO (h)	Overall (Y/N)
Charles Yates – Fred Olsen Seawind									
Original	N	N	N	N	N	N	N	N	N
ASM1	Y	Y	Y	Y	Y	Y	Y	Y	Y
Voting Statement:									
<p>The applicable STC objectives are best met by rules which are as clear, simple and transparent as possible. This provides all parties with greater clarity and hence facilitates the needed rapid development of an efficient transmission network. Providing projects with more information and an opportunity to refine their decisions in the light of Clean Power 2030 will encourage investment and rapid progress towards Clean Power in 2030 and beyond.</p>									
Post Send Back Voting Statement:									
No additional statement provided.									

Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Better facilitates ASO (h)	Overall (Y/N)
Claire Hynes – RWE Renewables									
Original	Y	Y	Y	-	-	Y	Y	-	Y
ASM1	Y	Y	Y	-	-	Y	Y	-	Y
Voting Statement:									
<p>Both the Original and ASM 1 better facilitates the objectives. The new transmission connection process batches 'ready' projects in a co-ordinated network design that links with strategic planning. This new approach should lead to more reliable signals for future investment which will help to ensure that the transmission works are delivered more efficiently in line with Objective (a) (b), (e) and (f).</p>									
<p>Our overall preference is for ASM 1 which reflects CMP434 WACM 6 in the STC. WACM 6 ensures that the obligations linked to the final version of the guidance documents and methodologies are reviewed and formally recommended by experts in the CUSC Modification Panel for the appropriate documents to be codified at a future date. The lessons learnt should result in better more robust processes sitting under the STC if deemed appropriate.</p>									
Post Send Back Voting Statement:									
No additional statement provided.									

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Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Better facilitates ASO (h)	Overall (Y/N)
Garth Graham / Andy Colley – SSE Generation									
Original	Y	Y	Y	Y	-	Y	Y	-	Y
ASM1	Y	Y	Y	Y	-	Y	Y	-	Y

Voting Statement:

No voting statement provided.

Post Send Back Voting Statement:

The Original Proposal and ASM1 both facilitate the STC applicable objectives better than the baseline, and are positive when considered against objectives a), b), c), d), f) and g) (neutral on all other objectives). For the avoidance of doubt, my vote has not changed from the original Workgroup vote except for the inclusion of a positive vote against new objective b). Objective e) remains neutral.

As this modification seeks to facilitate changes proposed under CUSC Modification CMP434, I have no strong preference between the Original and ASM1, but the solution adopted should align and be consistent with the selected CMP434 option.

If approved, alongside CMP434, either solution will facilitate the necessary STC process changes required to better support a revised connections applications process, which is urgently required; and thus result in a more efficient and effective end to end connections process.

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Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Better facilitates ASO (h)	Overall (Y/N)
Graham Lear – NESO									
Original	Y	Y	Y	Y	-	Y	Y	-	Y
ASM1	Y	Y	Y	Y	-	Y	Y	-	Y

Voting Statement:

The Original Proposal and ASM1 both facilitate the STC applicable objectives better than the baseline, particularly in the context of changes proposed under CUSC Modification CMP434. My preferred option of these is the Original Proposal.

Both the Original Proposal and ASM1 introduce process changes for applications leading to greater coordination in the production of TO Construction Offers. Greater coordination is also reflected in the design process which utilises the Connection Network Design Methodology to bring about a more efficient and coordinated design of the transmission network. They facilitate the work carried out under CUSC modification CMP434 which itself facilitates effective competition in the generation and supply of electricity. Both introduce a route for reserving connection/interface points and capacity for new applicants.

Where the Original Proposal and ASM1 differ is with respect to treatment of Methodologies going forward. I believe that the Transmission License should set out the appropriate expectations for a review and the process for revising the Methodologies rather than the STC, due to the fact the Methodologies have derived from the Transmission License. I also feel that the ultimate intention of ASM1 would be to codify the Methodologies, which would hinder NESO's ability to make efficient and decisive changes and impact its ability to comply with the current and future obligations more broadly. For these reasons, I believe the Original Proposal is better than ASM1. It should also be noted that ASM1 should only be considered if CUSC Modification CMP434 WACM6 is the preferred option in that code modification.

Post Send Back Voting Statement:

Post send back my vote for ASO (a) and (c) through to (h), as well as my overall vote, remains unchanged. With respect to ASO (b) I believe both the Original Proposal and ASM1 better facilitate the STC applicable objectives than the baseline by introducing greater coordination in the development of the transmission system and production of connection offers.

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Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Better facilitates ASO (h)	Overall (Y/N)
Greg Stevenson – SSEN Transmission									
Original	Y	Y	Y	Y	-	Y	Y	-	Y
ASM1	N	N	Y	N	N	Y	N	-	N

Voting Statement:

I believe that the Original solution better facilitates Applicable STC Objectives A, B, C, E & F.

Objective A

I believe that the move to a gated connections process will allow Transmission Owners (TOs) and NESO to effectively discharge obligations imposed on them. The reformed connections process will enhance the viability of connections projects entering the connections process that will allow TOs greater clarity when creating Transmission Owner Construction Offers (TOCOs).

Objective B

I believe that the Original proposal will allow TOs and NESO to develop the National Electricity Transmission System (NETS) in a more coordinated way under the new process with batched network assessments and reduction in speculative applications. This will lead to clearer identification of what works are required to connect a customer as well as provide greater certainty of Transmission Reinforcement works which will strengthen long-term investment plans. This change will also take on a more strategic planning approach to electricity connections by aligning with Clean Power 2030 and then the first Strategic Spatial Energy Plan (SSEP) which I view as a positive change for future coordination of the NETS.

Objective C

I believe that the proposal will better facilitate competition by allowing viable projects that are needed and ready to connect.

Objectives E & F

I believe that the Original will promote and improve industry practice under STC arrangements, as the proposed changes will enhance coordination of connection applications and strengthen network assessments carried out by TOs. The move away from first come first served is much needed and will enable connection of projects required to meet Scottish & UK Government Net Zero targets, potentially with an earlier date than they would receive under the Baseline.

Post Send Back Voting Statement:

Following send back by the Authority and subsequent reassessment of the proposal against the updated Applicable STC Objectives, my overall view and support of the Original solution has not changed in light of these changes.

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Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Better facilitates ASO (h)	Overall (Y/N)
Joe Colebrook – Innova Renewables									
This Workgroup member was not in attendance for the CM095 Second Workgroup Vote. Their original vote and voting statement can be found in Annex 9 .									

Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Better facilitates ASO (h)	Overall (Y/N)
Kyran Hanks – WWA Ltd									
Original	Y	Y	Y	Y	-	-	Y	-	Y
ASM1	Y	Y	Y	Y	-	-	Y	-	Y
Voting Statement:									
The proposals seek to address the connections queue. As such, they are to be supported. I believe that the changes are consistent with the relevant objectives. I consider that the proposals should be codified and hence support ASM1.									
Post Send Back Voting Statement: Implementing connection reform allows NESO to comply with its licence. Its duty to create a strategic spatial energy plan and a centralised strategic network plan will be enhanced by implementing connection reform. Hence, the proposal satisfies objective b.									

Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Better facilitates ASO (h)	Overall (Y/N)
Paul Jones – Uniper									
Original	Y	Y	-	-	-	Y	-	-	Y
ASM1	Y	Y	-	-	-	Y	-	-	Y
Voting Statement:									
Original: Facilitates implementation of CMP434 original and associated WACMs									
ASM1: Facilitates implementation of CMP434 WACM7									
On my decision about which one is better: No preferred solution between the original and ASM1, as the appropriate solution should be chosen to facilitate the matching CMP434 solution.									
Post Send Back Voting Statement:									
No additional statement provided.									

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Workgroup Member	Better facilitates ASO (a)	Better facilitates ASO (b)	Better facilitates ASO (c)	Better facilitates ASO (d)	Better facilitates ASO (e)	Better facilitates ASO (f)	Better facilitates ASO (g)	Better facilitates ASO (h)	Overall (Y/N)
Richard Woodward – NGET									
Original	Y	Y	Y	Y	-	-	Y	-	Y
ASM1	-	-	Y	Y	-	N	Y	-	Y

Voting Statement:

The original CM095 solution provides the minimum necessary changes to NESO-to-TO processes in STC to facilitate the proposed changes under CUSC via CMP434.

The solution though, as the proposer acknowledges, is dependent on additional operational detail being set out in the STC Procedures (STCPs). I am wary that the proposed drafting for these STCP changes has not yet been shared by the proposer. Consequently, I am unable to fully assess the full impact of the changes at this stage, which is not desirable given the significance of the TMO4+ proposals.

I trust that NESO will bring forward these STCP changes ASAP, and work collaboratively with the Transmission Owners to agree solutions which are workable for all. In my view the STCP changes will be 'material', so therefore must be submitted to Ofgem for decision. This should occur in good time to allow their final determination to consider the totality of code changes needed to implement TMO4+.

Regarding ASM1; the benefits of this solution derive, in my view, completely from those facilitated by the original proposal. Whilst I agree with the underlying principle of transparent accountability of NESO (and to a lesser extent TOs) on performance of the new TMO4+ process, I believe the intention of the alternative can be facilitated much more efficiently without codification.

Post Send Back Voting Statement:

The reassessment of the CM095 proposal(s) in reference to the updated STC applicable objectives has not caused us to reconsider or deviate from our previous assessment of this modification. Please refer to our previous voting statement for more information.

Of the 10 votes, how many voters said this option was better than the Baseline.

Option	Number of voters that voted this option as better than the Baseline
Original	8
Alternative STC Modification 1	8

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Stage 2b – Alternative STC Modification Vote (If required)

Where one or more Alternative STC Modifications exist, does each Alternative STC Modification better facilitate the Applicable STC Objectives than the Original Modification Proposal?

Workgroup Member	Company	ASM1 better than Proposer's solution Yes/No
Allan Love	Scottish Power Transmission	N
Anthony Cotton	Green Generation Energy Networks Cymru Ltd	N
Charles Yates	Fred Olsen Seawind	Y
Claire Hynes	RWE Renewables	Y
Garth Graham/Andy Colley	SSE Generation	Y
Graham Lear	NESO	N
Greg Stevenson	SSEN Transmission (SHET)	N
Kyran Hanks	WWA Ltd	Y
Paul Jones	Uniper	N/A
Richard Woodward	NGET	N

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Stage 2c – Workgroup Vote

Which option is the best? (Baseline, Original Proposal or Alternative STC Modification 1)

Workgroup Member	Company	Industry Sector	BEST Option?	Which objective(s) does the change better facilitate?
Allan Love	Scottish Power Transmission	Transmission	Original	A, B, C, F, G
Anthony Cotton	Green Generation Energy Networks Cymru Ltd	Other / Consultant	Baseline	N/A
Charles Yates	Fred Olsen Seawind	Generator	ASM1	A, B, C, D, E, F, G, H
Claire Hynes	RWE Renewables	Generator	ASM1	A, B, C, F, G
Garth Graham/Andy Colley	SSE Generation	Generator	ASM1	A, B, C, D, F, G
Graham Lear	NESO	System Operator	Original	A, B, C, D, F, G
Greg Stevenson	SSEN Transmission (SHET)	Onshore Transmission Licensee	Original	A, B, C, D, F, G
Kyran Hanks	WWA Ltd	Other / Consultant	ASM1	A, B, C, D, G
Paul Jones	Uniper	Generator	No preference	N/A
Richard Woodward	NGET	Onshore Transmission Licensee	Original	A, B, C, D, G