

Public

CMP446 Increasing the lower threshold in England and Wales for Evaluation of Transmission Impact Assessment

Workgroup Meeting 3, 03 February 2025

Online Meeting via Teams

WELCOME

Agenda

Topics to be discussed	Lead
Welcome	Chair
Action updates and follow ups from Workgroup 2	Proposer
Workgroup Consultation Update	Chair
Any Other Business	All
Next Steps	Chair

Public

Expectations of a Workgroup Member

Contribute to the discussion

Be respectful of each other's opinions

Language and Conduct to be consistent with the values of equality and diversity

Do not share commercially sensitive information

Be prepared - Review Papers and Reports ahead of meetings

Complete actions in a timely manner

Keep to agreed scope

Email communications to/cc'ing the .box email

Your Roles

Help refine/develop the solution(s)

Bring forward alternatives as early as possible

Vote on whether or not to proceed with requests for Alternatives

Vote on whether the solution(s) better facilitate the Code Objectives

Workgroup Membership

Role	Name	Company
Proposer	Martin Cahill	NESO
Workgroup Member	Brian Hoy	Electricity North West
Workgroup Member	Ciaran Fitzgerald	Scottish Power Renewables
Workgroup Member	Dan Clarke	National Grid Electricity Transmission (nominated by NESO)
Workgroup Member	Drew Johnstone	Northern Powergrid
Workgroup Member	Garth Graham	SSE Generation
Workgroup Member	Grant Rogers	Qualitas Energy
Workgroup Member	Helen Stack	Centrica
Workgroup Member	Jack Purchase	National Grid Electricity Distribution
Workgroup Member	Joe Colebrook	Innova Renewables
Workgroup Member	Kate Teubner	Low Carbon
Workgroup Member	Kyran Hanks	WWA (nominated as a CUSC Panel Member)
Workgroup Member	Nina Sharma	Drax
Workgroup Member	Ross O'Hare	SSEN
Workgroup Member	Zivanayi Musanhi	UK Power Networks
Authority Representative	Alasdair MacMillan	Ofgem

What is the Alternative Request?

What is an Alternative Request? The formal starting point for a Workgroup Alternative Modification to be developed which can be raised up until the Workgroup Vote.

What do I need to include in my Alternative Request form? The requirements are the same for a Modification Proposal you need to articulate in writing:

- a description (in reasonable but not excessive detail) of the issue or defect which the proposal seeks to address compared to the current proposed solution(s);
- the reasons why you believe that the proposed alternative request would better facilitate the Applicable Objectives compared with the current proposed solution(s) together with background information;
- where possible, an indication of those parts of the Code which would need amending in order to give effect to (and/or would otherwise be affected by) the proposed alternative request and an indication of the impacts of those amendments or effects; and
- where possible, an indication of the impact of the proposed alternative request on relevant computer systems and processes.

How do Alternative Requests become formal Workgroup Alternative Modifications? The Workgroup will carry out a Vote on Alternatives Requests. If the majority of the Workgroup members or the Workgroup Chair believe the Alternative Request will better facilitate the Applicable Objectives than the current proposed solution(s), the Workgroup will develop it as a Workgroup Alternative Modification.

Who develops the legal text for Workgroup Alternative Modifications? ESO will assist Proposers and Workgroups with the production of draft legal text once a clear solution has been developed to support discussion and understanding of the Workgroup Alternative Modifications.

Timeline for CMP446 on 31 January 2025

Workgroups		High Level Objectives
CMP446 Workgroup Meeting 1	24/01/2025	Full solution and ToR assessment
CMP446 Workgroup Meeting 2	30/01/2025	Any Alternative requests suggestion/ Review of Workgroup Consultation
CMP446 Workgroup Meeting 3	03/02/2025	Review of Workgroup Consultation / Contingency
CMP446 Workgroup Consultation	07/02/2025 - 13/02/2025	
CMP446 Workgroup Meeting 4	19/02/2025	Workgroup Consultation feedback and any Alternative votes
CMP446 Workgroup Meeting 5	24/02/2025	Finalise legal text and ToR Confirmation, Workgroup Vote
CMP446 Workgroup Meeting 6	26/02/2025	ToR confirmation and Workgroup Vote/ Contingency
CMP446 Workgroup Report to Panel	05/03/2025	
CMP446 Panel for ToR sign off	10/03/2025	
Post Workgroups		
CMP446 Code Administrator Consultation	10/03/2025 - 17/03/2025	
CMP446 Draft Final Modification Report to Panel	24/03/2025	
CMP446 Panel Recommendation Vote	28/03/2025	
CMP446 Final Modification Report to Panel to check Votes	28/03/2025	
CMP446 Final Modification to Ofgem	28/03/2025	
CMP446 Decision Date	29/04/2025	
CMP446 Implementation Date	02/05/2025	

Terms of Reference*

Workgroup Term of Reference

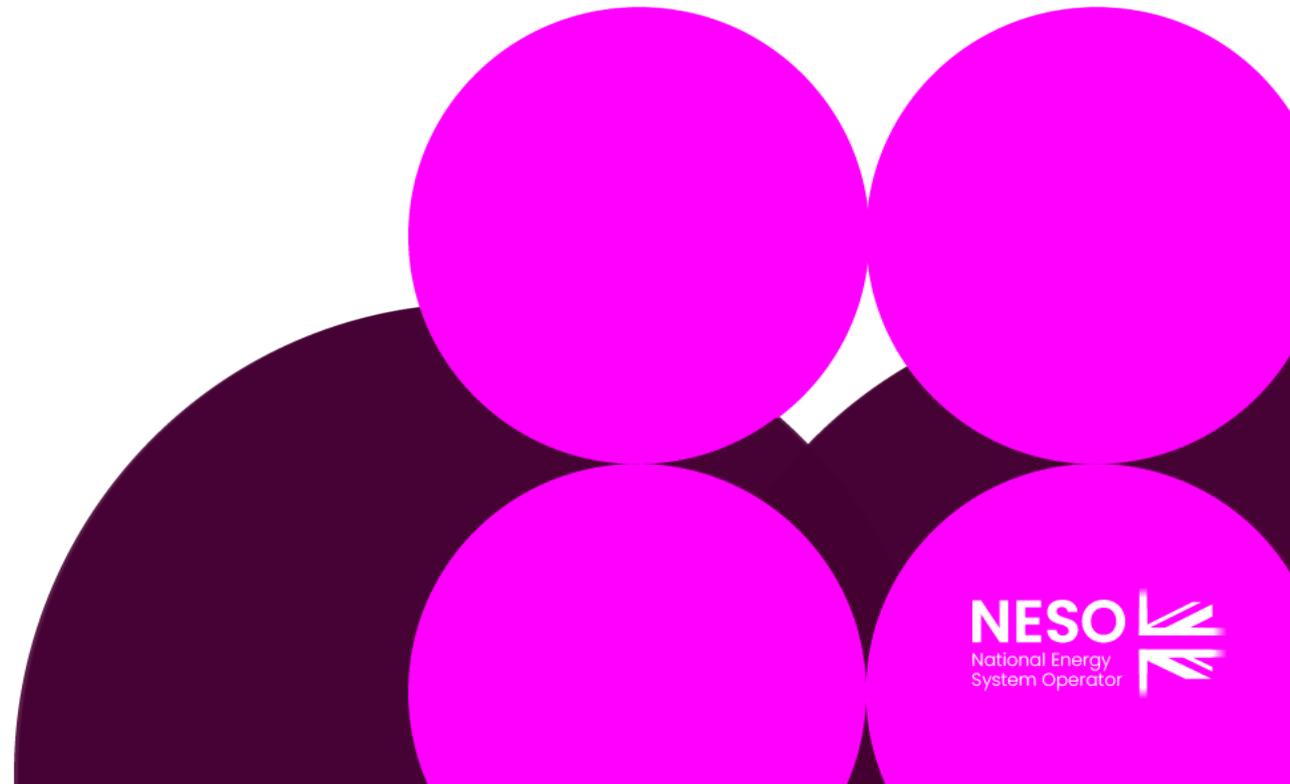
- | | |
|----|--|
| a) | Consider EBR implications |
| b) | Consider the scope of work identified and whether this is achievable within the timeframe outlined in the Ofgem Urgency decision letter. |
| c) | Consider the legal and practical implementation of this modification alongside CMP434/CMP435 and any other relevant in flight CUSC modifications. |
| d) | Consider any cross-code impacts. |
| e) | Consider data and any other requirements from DNOs to implement |
| f) | Consider how CMP446 would be compatible with the requirement for the NESO acting in a non-discriminatory manner |
| g) | Consider how CMP446 would be compatible with the requirement for harmonised rules for generator connections in GB. |
| h) | Consider what the MW capacity relates to: for example, export capacity or installed capacity or developer capacity? |
| i) | Consider if the change applies only to new projects (up to 5MW) or also to existing D connected projects that increase their capacity by up to 5MW (4MW to 6MW), and projects that reduce to be below the threshold. |
| j) | Consider potential for interlinked impact of cumulative/aggregated <5MW projects which would otherwise breach the proposed 5MW threshold. |
| k) | Consider the interaction with Technical (Planning) limits and Distribution (DNO) managed Active Network Management (ANM) schemes |

Public Actions

Action number	Action	Status
1	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	Open
5	The Proposer took an action to develop the implementation timelines for CMP446 in relation to CMP434 and CMP435 further, considering different decision outcomes	Open
7	Clarify the definition of MW capacity to be used, as different terms such as installed capacity, export capacity, and developer capacity are used inconsistently	Open
11	Workgroup members discussed GSPs that have no fault level headroom and therefore would be subject to current processes. A Workgroup member took an action to investigate whether a list of these GSPs could be provided.	Open
12	A Workgroup member took an action to update the table of different scenarios with columns for existing and requested capacities. This table will include columns for installed and export capacity and whether a TIA would be required for each capacity type per scenario.	Open
13	The proposer took an action to send an up-to-date pie chart confirming total accepted DER by technology in MW to Workgroup members and to ensure the up-to-date figures are added into the Workgroup consultation.	Open
14	The Proposer took an action to make it clear that implementation refers to legal text implementation, to add some example timings, and to make it clear that removal of existing REPs only refers to yet to be connected	Open
15	Confirm the plan for communications for existing projects, whether they do or do not have to do apply for Gate 2. It was noted that this could be the responsibility of DNOs, however this will be confirmed.	Open
16	The Proposer took an action to update the wording in the proposed legal text to change "it is agreed that" to "it is acknowledged that"... "only an Embedded Small Power Station which is 5MW or above is a Relevant Embedded Power Station requiring the submission of an Evaluation of Transmission Impact to The Company in accordance with Paragraph 5.1(a)"	Open
17	Following feedback from Workgroup 2, NESO to determine whether the proposal should include a definition of capacity to be used in the legal text and whether this should be based on Registered Capacity, Developer Capacity or anything different.	Open
18	A Workgroup Member took an action to create a list of scenarios where there could be a cross over between this Modification and Clean Power 2030 to look at in the next Workgroup meeting.	Open

Action updates and follow ups from Workgroup 2

Martin Cahill / Alex Markham - NESO



Action 1 - Scenarios

	Example Scenario	Existing		Requested		TIA Required?		Outcome check
		Installed Capacity	Export Capacity	Installed Capacity	Export Capacity	capacity as criteria	Export capacity as criteria	
New projects	New DG connection eg 4MW	0	0	<5MW	<5MW	No	No	same
	New DG connection eg 6MW	0	0	≥5MW	≥5MW	Yes	Yes	same
	New DG connection with reduced export eg 6MW installed but 3MW e	0	0	≥5MW	<5MW	Yes	No	different
Changes to existing projects currently under both thresholds	Existing project 2MW to increase to 4MW for both	<5MW	<5MW	<5MW	<5MW	No	No	same
	Existing project 2MW to increase to 6MW for both	<5MW	<5MW	≥5MW	≥5MW	Yes	Yes	same
	Existing project 2MW to increase to 6MW installed but 4MW export	<5MW	<5MW	≥5MW	<5MW	Yes	No	different
Changes to existing projects currently over both thresholds	Existing project of 6MW for both	≥5MW	≥5MW	≥5MW	≥5MW	Yes	Yes	same
Changes to existing projects currently over installed only	Existing project 6MW installed but 2MW export, no new installed but e	≥5MW	<5MW	≥5MW	<5MW	Yes	No	different
	Existing project 6MW installed but 2MW export, increasing installed to	≥5MW	<5MW	≥5MW	<5MW	Yes	No	different
	Existing project 6MW installed but 2MW export, increasing installed to	≥5MW	<5MW	≥5MW	≥5MW	Yes	Yes	same

Notes.

Existing projects would cover already connected or changes to contracted not yet connected

These are the options assuming no fault level issues at GSP

These situations would also apply to existing demand

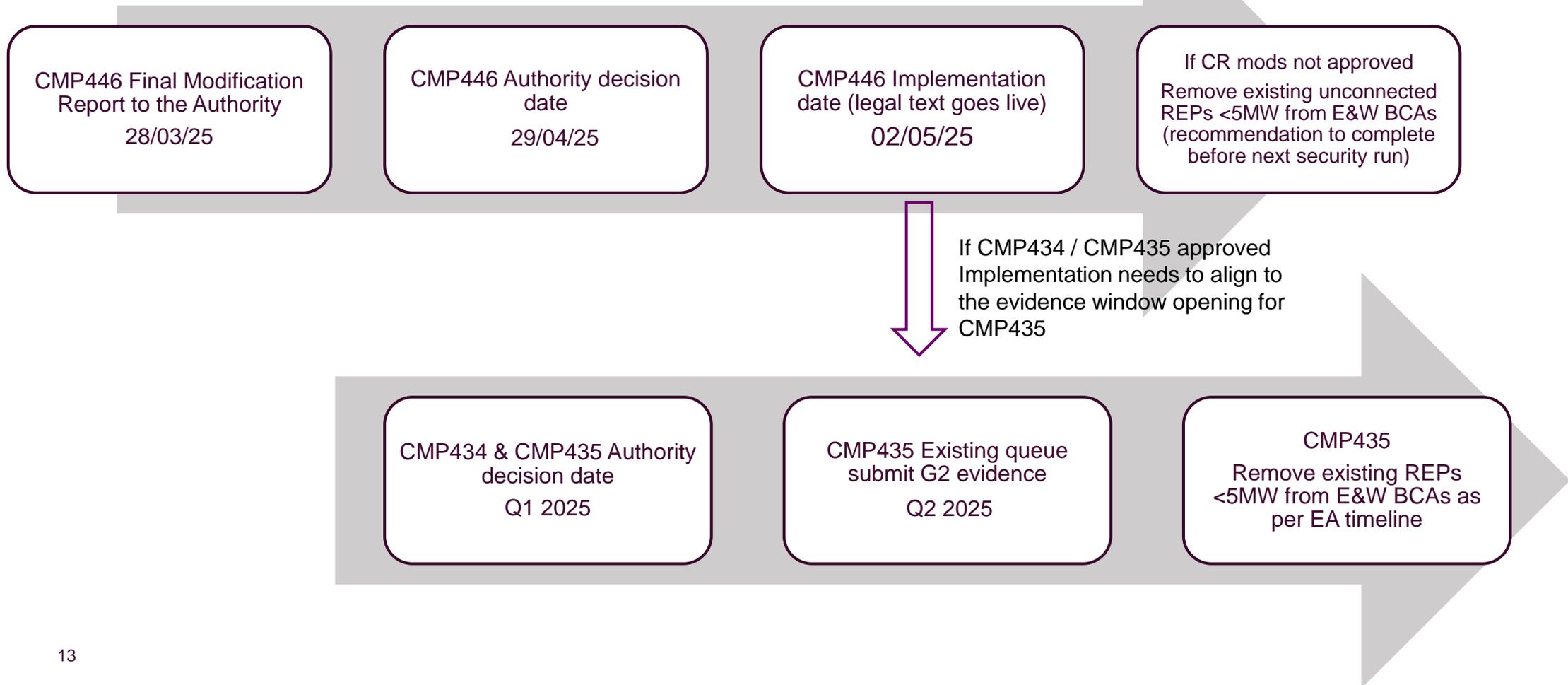
1 connections adding generation

Action 12 – Version 2

Category	Example Scenarios		Existing		New		TIA Required?		Outcome check
			Installed Capacity	Export Capacity	Installed Capacity	Export Capacity	Installed capacity	Export capacity	
A new generation connection	1	New generation connection with 4MW export capacity	N/A	N/A	4MW	4MW	No	No	Same
	2	New generation connection with 6MW export capacity	N/A	N/A	6MW	6MW	Yes	Yes	Same
	3	New generation connection with 6MW installed capacity but only 3MW export	N/A	N/A	6MW	3MW	Yes	No	Different
Changes to an existing connection with both export and installed capacities below the 5MW threshold	4	Existing connection with 2MW export capacity increasing to 4MW	2MW	2MW	4MW	4MW	No	No	Same
	5	Existing connection with 2MW export capacity to increasing to 6MW	2MW	2MW	6MW	6MW	Yes	Yes	Same
	6	Existing connection with 2MW export capacity increasing to 6MW installed capacity and 4MW export capacity	2MW	2MW	6MW	4MW	Yes	No	Different
Changes to an existing connection with both export and installed capacities above the 5MW threshold	7	Existing connection with 6MW of export increasing to 8MW	6MW	6MW	6MW	8MW	Yes	Yes	Same
Changes to an existing connection with installed capacity only above the 5MW threshold	8	Existing connection with 6MW installed capacity but only 2MW export increasing to 4MW export	6MW	2MW	6MW	4MW	Yes	No	Different
	9	Existing connection with 6MW installed capacity with 2MW export increasing installed capacity to 8MW and export capacity to 4MW	6MW	2MW	8MW	4MW	Yes	No	Different
	10	Existing connection with 6MW installed capacity with 2MW export, increasing installed capacity to 8MW and export capacity to 6MW	6MW	2MW	8MW	6MW	Yes	Yes	Same
Changes to an existing connection wanting to reduce capacity	11	Existing connection with 6MW of export capacity reducing to 4MW of export capacity	6MW	6MW	4MW	4MW	No	No	Same
	12	Existing connection with 6MW of both export and installed capacity reducing export capacity to 4MW	6MW	6MW	6MW	4MW	Yes	No	Different

Action 5/14 – CMP446 timeline

This is the current position but timeline for CMP446 reviewed each workgroup



TM04+ and CMP446 Timing



Following implementation, impacted projects are no longer considered “in scope existing connection contracts” for the purpose of CMP435 Gate 2 criteria. Later a non-material change will be required if CMP435 WACM1 approved, standard legal text applies at implementation. CMP435 will need updated baseline with Appendix G/Schedule 2 exhibit 1A clauses removed.



Because implementation is before CMP435, impacted projects are no longer considered “in scope existing contracts” for Gate 2. If WACM1 is approved then alternative legal text is used for CMP446. CMP435 will need updated baseline with Appendix G/Schedule 2 exhibit 1A clauses removed.



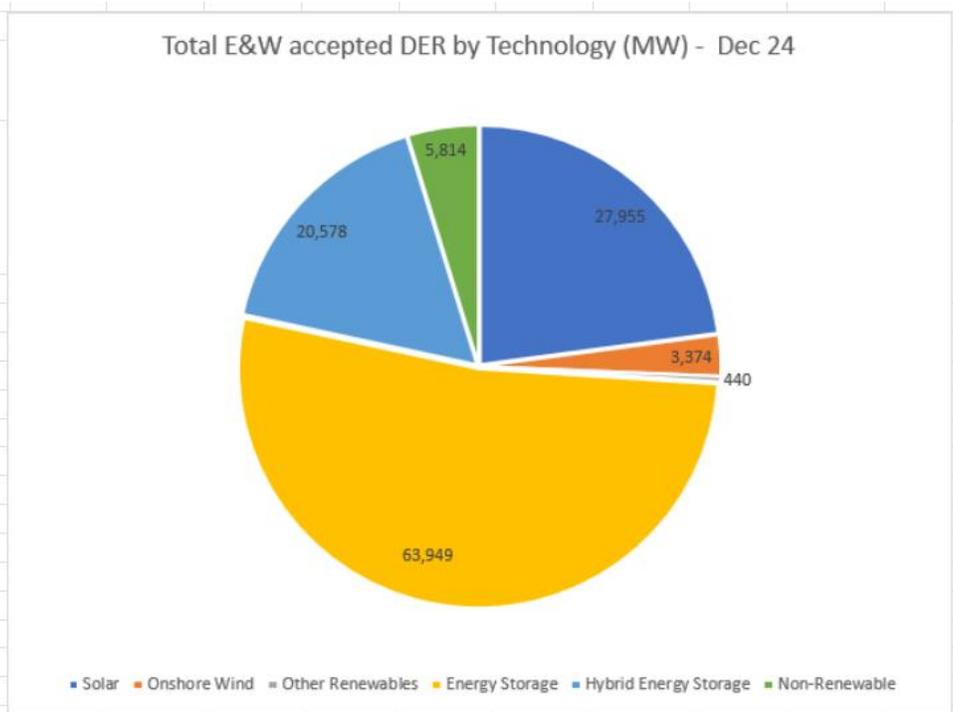
Positive action required which means that impacted project are no longer considered “in scope existing agreements” for the purpose of Gate 2 window. Implementation should still be before window opening, and legal text will be based off CMP435 decision

Action 7/17 Capacity Definition

Following feedback from workgroup we have updated the legal text to include a reference to Registered Capacity as defined in the Distribution Code

(f) In England and Wales, it is acknowledged that (unless notified otherwise by The Company and on basis this should be the exception rather than the norm) only an Embedded Small Power Station which [has a Registered Capacity (as defined in the Distribution Code) of][is] 5MW or above is a Relevant Embedded Power Station requiring the submission of an Evaluation of Transmission Impact to The Company in accordance with Paragraph 5.1(a) above."

Action 13 – clarity on data



Appendix G Data	All not yet connected DER between 1MW and < 10MW	How many MWs?
NGED	199	850
UKPN	183	745
SPM	31	12
ENWL	79	291.5
NPG	83	303
SSEN	72	330
Total	572	2,531.5

Table 35b: All not yet connected DER from 1MW > X > 5MW

Appendix G Data	All not yet connected DER between 1MW and < 5MW	How many MWs?
NGED	103	232.3
UKPN	114	265.7
SPM	2	6
ENWL	67	120
NPG	67	136.4
SSEN	37	92.1
Total	390	852.5

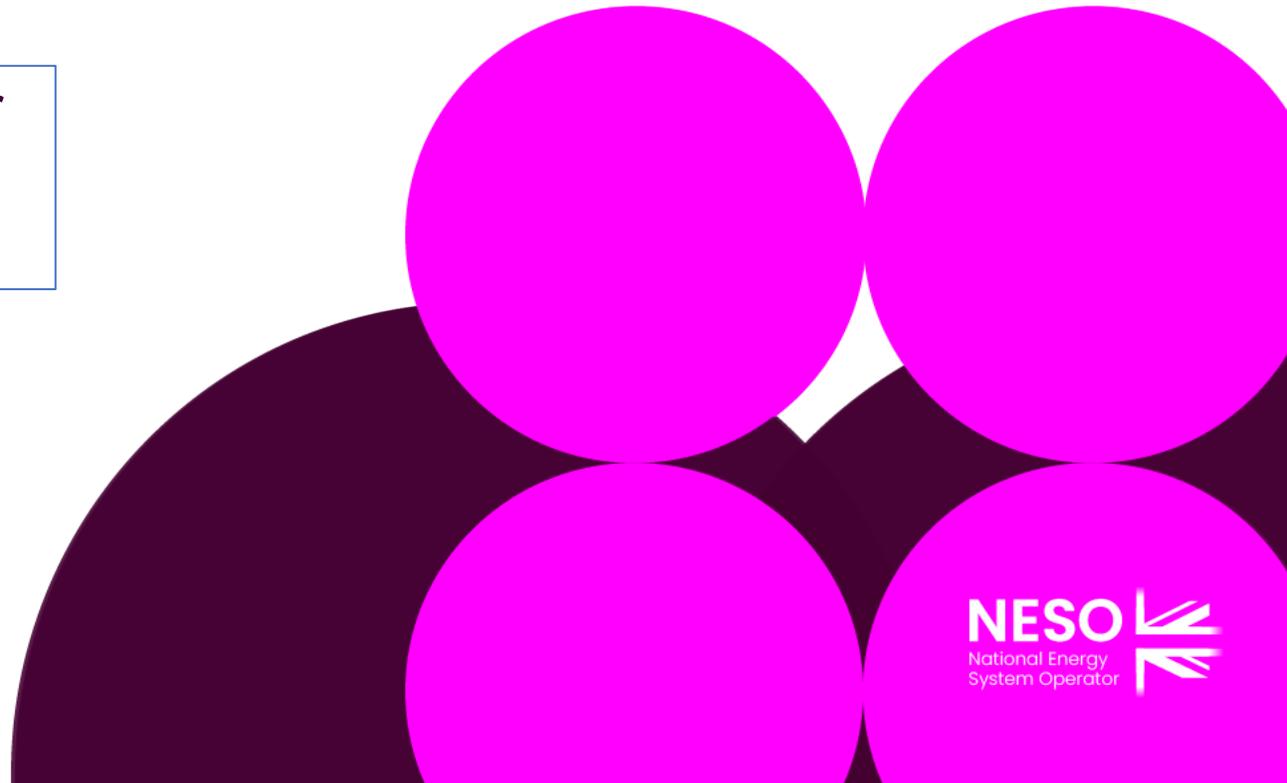
Clarity requested on what this slide was depicting

- Source, section 3.3 of the Position Paper on TIA thresholds
- It was depicting the total accepted DER by technology split (MW) in E&W as of July 2024.
- Comparing the pie chart against the above tables (which were omitted from WG1 slides), it was demonstrating that DER projects that are 1 – 9.9MW and 1-4.9MW make up a circa 2.5% and 0.7% share of the overall distribution connections queue.

- The paper presented that <10MW and <5MW customers are more likely to connect at much lower voltages (33kW and below), their overall impact on the transmission system is negligible and an exception could be made to remove them from the TIA process.
- Conclusion of report is that NGET and NESO support the proposal to amend the lower TIA threshold to 5MW at this stage for the TIA process

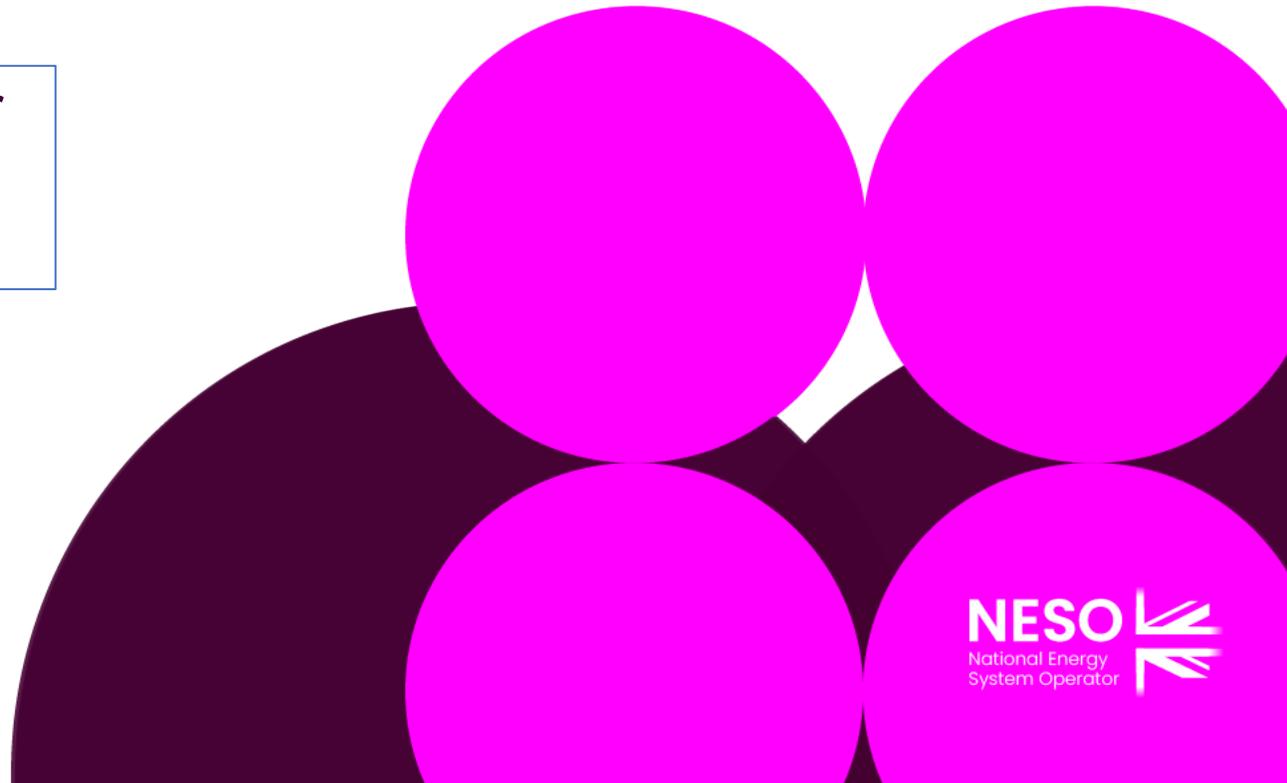
Workgroup Consultation Update

Milly Lewis – NESO Code Administrator



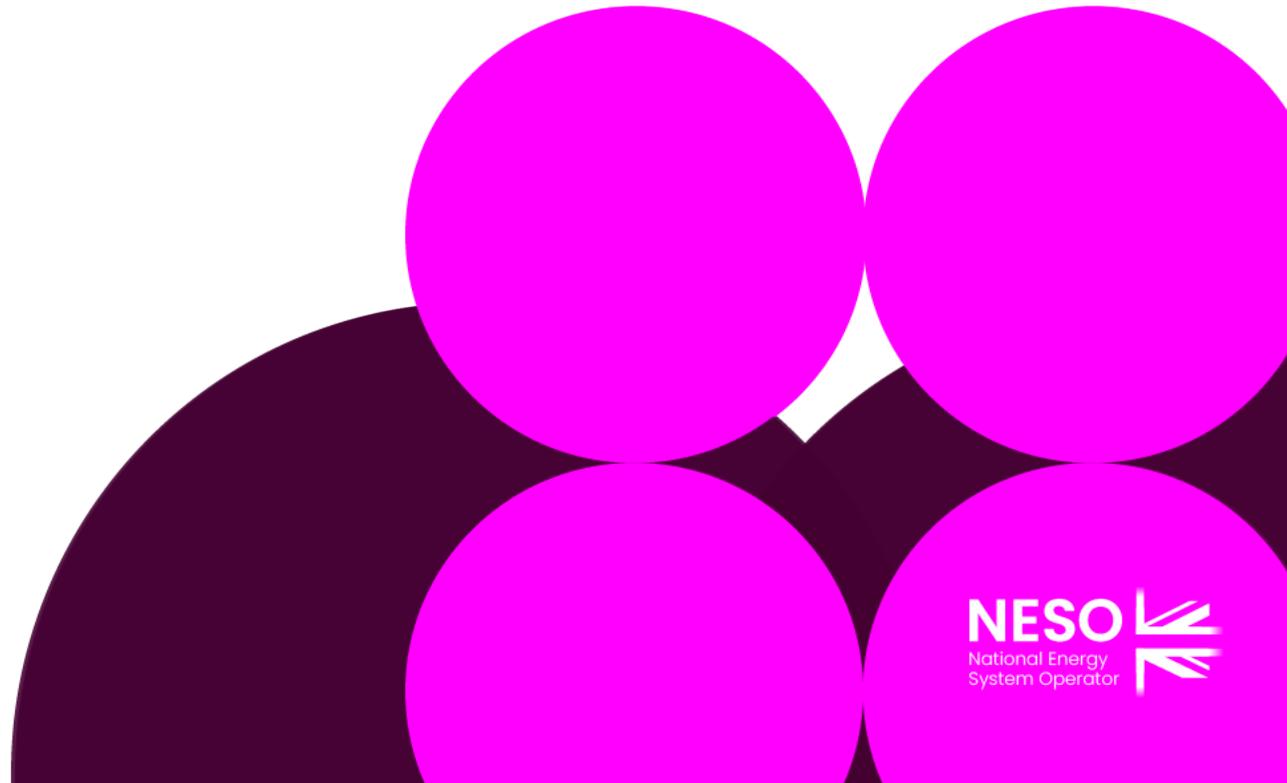
Any Other Business

Milly Lewis – NESO Code Administrator



Next Steps

Milly Lewis – NESO Code Administrator



Timeline for CMP446 on 31 January 2025

Workgroups		High Level Objectives
CMP446 Workgroup Meeting 1	24/01/2025	Full solution and ToR assessment
CMP446 Workgroup Meeting 2	30/01/2025	Any Alternative requests suggestion/ Review of Workgroup Consultation
CMP446 Workgroup Meeting 3	03/02/2025	Review of Workgroup Consultation / Contingency
CMP446 Workgroup Consultation	07/02/2025 - 13/02/2025	
CMP446 Workgroup Meeting 4	19/02/2025	Workgroup Consultation feedback and any Alternative votes
CMP446 Workgroup Meeting 5	24/02/2025	Finalise legal text and ToR Confirmation, Workgroup Vote
CMP446 Workgroup Meeting 6	26/02/2025	ToR confirmation and Workgroup Vote/ Contingency
CMP446 Workgroup Report to Panel	05/03/2025	
CMP446 Panel for ToR sign off	10/03/2025	
Post Workgroups		
CMP446 Code Administrator Consultation	10/03/2025 - 17/03/2025	
CMP446 Draft Final Modification Report to Panel	24/03/2025	
CMP446 Panel Recommendation Vote	28/03/2025	
CMP446 Final Modification Report to Panel to check Votes	28/03/2025	
CMP446 Final Modification to Ofgem	28/03/2025	
CMP446 Decision Date	29/04/2025	
CMP446 Implementation Date	02/05/2025	