Public

Code Administrator Meeting Summary

Workgroup Meeting 3: CMP446 Increasing the lower threshold in England and Wales for Evaluation of Transmission Impact Assessment (TIA)

Date: 3 February 2025

Contact Details

Chair: Milly Lewis, milly.lewis@nationalenergyso.com

Proposer: Martin Cahill, martin.cahill1@nationalenergyso.com

Key areas of discussion

The Chair noted that the purpose of Workgroup 3 is primarily to:

- Review the current actions.
- Discuss the Workgroup consultation, including whether any Workgroup Members plan to raise Alternatives.

Action updates

Action 1 – Scenario testing

A Workgroup Member presented a series of example scenarios where new and existing projects of varying capacity would trigger differing TIA requirements, depending on the assessment criteria used.

Action 12 – Scenario testing

A Workgroup Member presented an updated version of the previous scenario table, where additional examples were included to highlight the effect of reducing capacity. The author of the scenario table from Action 1 agreed to use the new table from Action 12 as the basis for this discussion.

It was noted by a number of Workgroup Members that example scenario 12 contained an error which needed to be corrected. An action was recorded to update the table accordingly.

A Workgroup Member asked for clarification on the reasons for the use of 'Installed Capacity' rather than 'Export Capacity'. The Proposer noted that in previous Workgroups there were

discussions around the merits of using 'Installed Capacity' versus 'Export Capacity' and 'Registered Capacity' versus 'Developer Capacity'. The Proposer confirmed that the Original Proposal didn't seek to include a definition of the type of capacity, however Workgroup Members have in previous discussions requested that this should be made clear with a definition included in the legal text. Following this feedback, the proposer has decided to include "Registered Capacity" as defined in the Distribution Code on the basis that this is the figure used by National Grid Electricity Transmission for network design, and it is a clearer definition to apply in the context of TIA thresholds than Developer or Export Capacity.

A Workgroup Member noted that connections through Independent Distribution Network Operators (IDNOs) and 'Export Capacity' at zero in both 'Existing' and 'New' projects have not been accounted for in the example scenarios. The Workgroup Member took an action to add these new scenario examples to the existing table.

In relation to the IDNO point specifically, the NGET Workgroup Member confirmed that there are a number of relevant embedded power stations in England and Wales connected through an IDNO that are included in Appendix G. The precedence has therefore been set that if a power station has been connected through an IDNO is deemed relevant (i.e. 1 MW and above) then it will be included in Appendix G and will be subject to the TIA process. This would not been changed as part of the Original Proposal.

A Workgroup Member raised a concern over the definition of project, particularly in the context of IDNO connections, and the potential for multiple points of connection as separate projects. The Proposer confirmed that this will need to be addressed when looking at the legal text.

Workgroup Members debated whether thresholds should be codified in Scotland. In a previous workgroup the proposer outlined the reasons for not codifying in Scotland, and this rationale will also be included as part of the Workgroup Consultation.

A Workgroup Member asked for clarification on whether cumulative increases in Registered Capacity are considered in the Original Proposal, to avoid a series of small projects circumventing the 5 MW threshold. The Chair confirmed with Workgroup Members that they understood the use of the terms 'Cumulative' and 'Incremental' increases in relation to the Original Proposal and that it was based on 'Cumulative' capacity increase.

The Chair took a vote on the Workgroup's preference for the use of 'Registered Capacity' or 'Export (developer) Capacity'. The majority of the Workgroup voted for 'Export (developer) Capacity', with the Proposer and the NGET Workgroup Member preferring 'Registered Capacity'.

A Workgroup Member took an action to raise a WACM where 'Export Capacity' is used as the criteria for whether a TIA will be required, in order to enable industry to choose their preferred solution to the issue.

Actions 5 and 14 – CMP446 Timeline

The Proposer noted that there had been a minor change to the timeline since Workgroup Meeting 2 and that the dates used were illustrative examples to aid discussions.

A Workgroup Member noted that in the first example timeline, the gate opening window is determined by CMP435 rather than CMP446. Workgroup Members approved the timeline, with a caveat that the dates need to be made as clear as possible in the Workgroup consultation.

Actions 7 and 17 – Capacity Definition

The Proposer noted that there had been a minor change to the proposed legal text. A Workgroup Member noted that Action 16 remains open and will need to be addressed. They further noted that the legal text in the WACM will be similar to the Original Proposal, but the term 'Export/Developer Capacity' will be used instead of 'Registered Capacity'.

A Workgroup Member asked if the Proposer would consider adding wording to the legal text that specifies that the 5 MW threshold is connected at High Voltage (HV) or below, to ensure the most efficient use of assets on the network and to avoid developers exploiting a loophole in the legal text. Other Workgroup Members did not support the idea of additional restrictions to the legal text, as it would increase complexity and potentially penalise projects unfairly. The Chair agreed to include this issue as part of the Workgroup consultation.

Action 13 – Clarity on data

Then Proposer noted that the pie chart has been updated as per action 13. No comments or questions were raised.

Action 18 - Clean Power 2030 scenarios

A Workgroup Member explained a series of example scenarios where changes in thresholds could potentially interact with Clean Power 2030, either aligned to Clean Power 2030 or not. The Chair noted that the Workgroup can note these potential interactions, but it is not within the scope of this Proposal to amend the scope of Clean Power 2030.

The Workgroup Member noted that there are potential scenarios where implementation of this Proposal could lead to an unfair advantage, where a project could jump ahead of other projects

in the transmission queue. Implementation of the Proposal could also lead to a potential increase in applications.

A Workgroup Observer noted that these issues are broader than the Proposal, so while it's important to be aware and discuss them, the Proposal should not seek to address them.

The Workgroup agreed with the outcomes noted in Scenario 1. More B sites could be connected, impacting the technical limits for A sites and the whole queue will change, so technical limits will need to change.

It was noted that the purpose of this Proposal is to enable smaller capacity projects to go through the connections process without a significant wait. A Workgroup Member noted that projects that are not strategically aligned won't have a transmission offer, but could still have a distribution offer.

It was discussed that this Proposal poses a risk that increases in sub 5 MW applications could have a significant (negative) effect on other projects, and the Workgroup should consider how likely this risk is. A Workgroup Member noted that they are unsure how likely this outcome is. The Chair noted that while the threshold in the Proposal has been set at 5 MW, this could be changed at a later date should it become an issue.

A Workgroup Member highlighted a situation where this Proposal could be used as a loophole, to get a project through the connections process that has previously not met the Clean Power 2030 criteria e.g. split larger projects into a number of smaller projects at less than the 5 MW threshold.

It was noted that it would be useful to draw out views from the industry in the Workgroup consultation on the predicted increase in applications under this Proposal.

The Original Proposer confirmed that these risks should be acknowledged and addressed in the Workgroup consultation.

Workgroup Consultation

The Chair went through each section of the draft Workgroup consultation document, seeking to identify where specific consultation questions should be raised in relation to each section.

A number of Workgroup Members proposed consultation questions that were added to the draft document as placeholders. The Chair will redraft the consultation document in full and share it with the Workgroup ahead of Workgroup Meeting 4.

Next Steps

A summary of the new actions raised in Workgroup Meeting 3, along with an updated copy of the slide pack, will be shared with the Workgroup by close on 3 February 2025.

The Chair will share an updated draft of the Workgroup Consultation document with Workgroup Members on 4 February 2025. Workgroup Members will have until 1pm on 5 February 2025 to provide comments on this document, either in a shared collaborative version or an offline version.

The Workgroup will reconvene at 2pm on 5 February for an additional Workgroup meeting to discuss the Workgroup Consultation, ahead of it being published on 07 February 2025.

Actions

For the full action log, click here.

1	WG1	Martin Cahill	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.	03/02	Closed
5	WG1	Martin Cahill	The Proposer took an action to develop the implementation timelines for CMP446 in relation to CMP434 and CMP435 further, considering different decision outcomes.	03/02	Closed
7	WG1	Martin Cahill	Clarify the definition of MW capacity to be used, as different terms such as installed capacity, export capacity, and developer capacity are used inconsistently.	03/02	Closed
11	WG2	Daniel Clarke	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.	03/02	Open
12	WG2	Brian Hoy	A Workgroup Member took an action to update the table of different scenarios with columns for existing and requested capacities. This table will	03/02	Closed

			include columns for installed and export capacity and whether a TIA would be required for each capacity type per scenario.		
13	WG2	Martin Cahill	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.	03/02	Closed
14	WG2	Martin Cahill	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	03/02	Closed
15	WG2	Martin Cahill	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.	03/02	Open
16	WG2	Martin Cahill	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)".	03/02	Closed
17	WG2	Martin Cahill	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.	03/02	Closed
18	WG2	Kate Teubner	A Workgroup Member took at 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.	03/02	Closed
19	WG3	Drew Johnstone	Workgroup Members noted that example scenario 12 on the table for 'Action 12 – Version 2' should be 'No' for 'Installed Capacity' and 'Same' for 'Outcome check'. A Workgroup Member will update the table accordingly.	05/02	Open
20	WG3	Zivanayi Musanhi	A Workgroup Member has agreed to update the table for 'Action 12 – Version 2' to include	05/02	Open

			scenarios where the 'Export capacity' is at zero in both the 'Existing' and 'New'.		
21	WG3	Garth Graham	A Workgroup Member has agreed to raise a WACM where export capacity is used as the underlying measure, as opposed to registered/installed capacity as in the Original Proposal.	05/02	Open
22	WG3	Martin Cahill	Proposer agreed to update the timeline slide ("TM04 & CMP Timing") to ensure the dates used are consistent across each example timeline and are clearly marked as for information/indicative only.	05/02	Open
23	WG3	Martin Cahill	Proposer will check the wording of the proposed legal text, to ensure it does not inadvertently exclude medium sized power stations.	05/02	Open

Attendees

Name	Initial	Company	Role
Milly Lewis	ML	NESO Code Administrator	Chair
Kat Higby	KH	NESO Code Administrator	Tech Sec
Matthew Larreta	ML	NESO Code Administrator	Tech Sec
Martin Cahill	MC	NESO	Proposer
Alex Markham	AM	NESO	NESO Representative
Brian Hoy	BH	Electricity North West	Workgroup Member
Dan Clarke	DC	National Grid Electricity Transmission	Workgroup Member
Deborah MacPherson	DM	Scottish Power	Workgroup Member
Drew Johnstone	DJ	Northern Powergrid	Workgroup Member
Garth Graham	GG	SSE Generation	Workgroup Member
Grant Rogers	GR	Qualitas Energy	Workgroup Member
Helen Stack	HS	Centrica	Workgroup Member
Jack Purchase	JP	National Grid Electricity Distribution	Workgroup Member

Joe Colebrook	JC	Innova Renewables	Workgroup Member
Kate Teubner	KT	Low Carbon	Workgroup Member
Kostas Fouskis	KF	Gridserve	Workgroup Observer
Kyle Smith	KS	Energy Networks Association	Workgroup Observer
Kyran Hanks	KH	Waters Wye Associates	Workgroup Member
Nina Sharma	NS	Drax	Workgroup Member
Ross O'Hare	RH	SSEN	Workgroup Member
Zivanayi Musanhi	ZM	UK Power Networks	Workgroup Member
Pete Ashton	PA	Roadnight Taylor	Workgroup Observer