Workgroup Consultation Response Proforma

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

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 [cusc.team@nationalenergyso.com](mailto:cusc.team@nationalenergyso.com) by **5pm** on **13 February 2025**. 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 [milly.lewis@nationalenergyso.com](mailto:milly.lewis@nationalenergyso.com) or [cusc.team@nationalenergyso.com](mailto:cusc.team@nationalenergyso.com)

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| --- | --- | --- |
| **Respondent details** | **Please enter your details** | |
| **Respondent name:** | Click or tap here to enter text. | |
| **Company name:** | Click or tap here to enter text. | |
| **Email address:** | Click or tap here to enter text. | |
| **Phone number:** | Click or tap here to enter text. | |
| **Which best describes your organisation?** | Consumer body  Demand  Distribution Network Operator  Generator  Industry body  Interconnector | Storage  Supplier  System Operator  Transmission Owner  Virtual Lead Party  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 CUSC (non-charging) Objectives are:**

1. *The efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence\*;*
2. *Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;*
3. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*\*; and*
4. *Promoting efficiency in the implementation and administration of the CUSC arrangements.*

*\* See Electricity System Operator Licence*

*\*\*The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.*

**Please express your views in the right-hand side of the table below, including your rationale.**

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| --- | --- | --- | --- |
| **Standard Workgroup Consultation questions** | | | |
| 1 | Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives? | Mark the Objectives which you believe each solution better facilitates: | |
| Original | A B C D |
| Alternative Request 1 | A B C D |
| Click or tap here to enter text. | |
| 2 | Do you support the proposed implementation approach? | Yes  No | |
| Click or tap here to enter text. | |
| 3 | Do you have any other comments? | Click or tap here to enter text. | |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | Yes (the request form can be found in the [Workgroup Consultation](https://www.neso.energy/industry-information/codes/cusc/modifications/cmp446-increasing-lower-threshold-england-and-wales-evaluation-transmission-impact-assessment-tia) Section)  No | |
| Click or tap here to enter text. | |
| 5 | Does the draft legal text satisfy the intent of the modification? | Yes  No | |
| Click or tap here to enter text. | |
| 6 | Do you agree with the Workgroup’s assessment that the modification does not impact the European Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code? | Yes  No | |
| Click or tap here to enter text. | |

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| **Specific Workgroup Consultation questions** | | |
| 7 | Do you believe that a codification of Scotland threshold is required for CMP446? | Yes  No |
| Click or tap here to enter text. |
| 8 | Is it clear that the change in threshold is cumulative not incremental? | Yes  No |
| Click or tap here to enter text. |
| 9 | Do you believe 5MW is the correct threshold and if not why and to what threshold level should it be? (Providing rationale and justification for any alternative MW threshold) | Yes  No |
| Click or tap here to enter text. |
| 10 | Are there any other generic scenarios (over and above those shown in Figure 2 and Figure 3 (Annex 7) that need to be considered by the Workgroup, please provide details of them and explain why they are relevant? | Yes  No |
| Click or tap here to enter text. |
| 11 | It is intended that where there is a fault level headroom that is less than 1kA or zero as stated by NGET at a GSP, then a project is required to go through the TIA irrespective of the change in threshold (from 1MW to 5MW) – do you agree with this and if not, why? | Yes  No |
| Click or tap here to enter text. |
| 12 | Do you agree that the Workgroup has identified the relevant risks if CMP446 is approved. If not, what further risks haven’t been identified yet, and why are they relevant? | Yes  No |
| Click or tap here to enter text. |
| 13 | Do you believe that as consequence of CMP446 there will be an increase in <5MW projects which is likely to have an impact on the Transmission Network? If so, what kind of projects could drive this? | Yes  No |
| Click or tap here to enter text. |
| 14 | Do you have any suggestions for any additional mitigation measures for the identified risk? | Yes  No |
| Click or tap here to enter text. |
| 15 | Do you understood that as a consequence of CMP446 that the curtailment assumptions for an accepted Technical Limits offer could be impacted? | Yes  No |
| Click or tap here to enter text. |
| 16 | Is the timeline of interactions understood? | Yes  No |
| Click or tap here to enter text. |
| 17 | Do you believe it is appropriate/ within scope of CMP446 for the Workgroup to consider this further, and if so why? | Yes  No |
| Click or tap here to enter text. |