

Public

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

Workgroup Meeting 4, 05 February 2025

Online Meeting via Teams

WELCOME

Agenda

Topics to be discussed	Lead
Welcome	Chair
Action updates and follow ups from Workgroup 3	Proposer
Workgroup Consultation Run Through	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 04 February 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 Meeting 4	05/02/2025	Workgroup Consultation Review
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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*

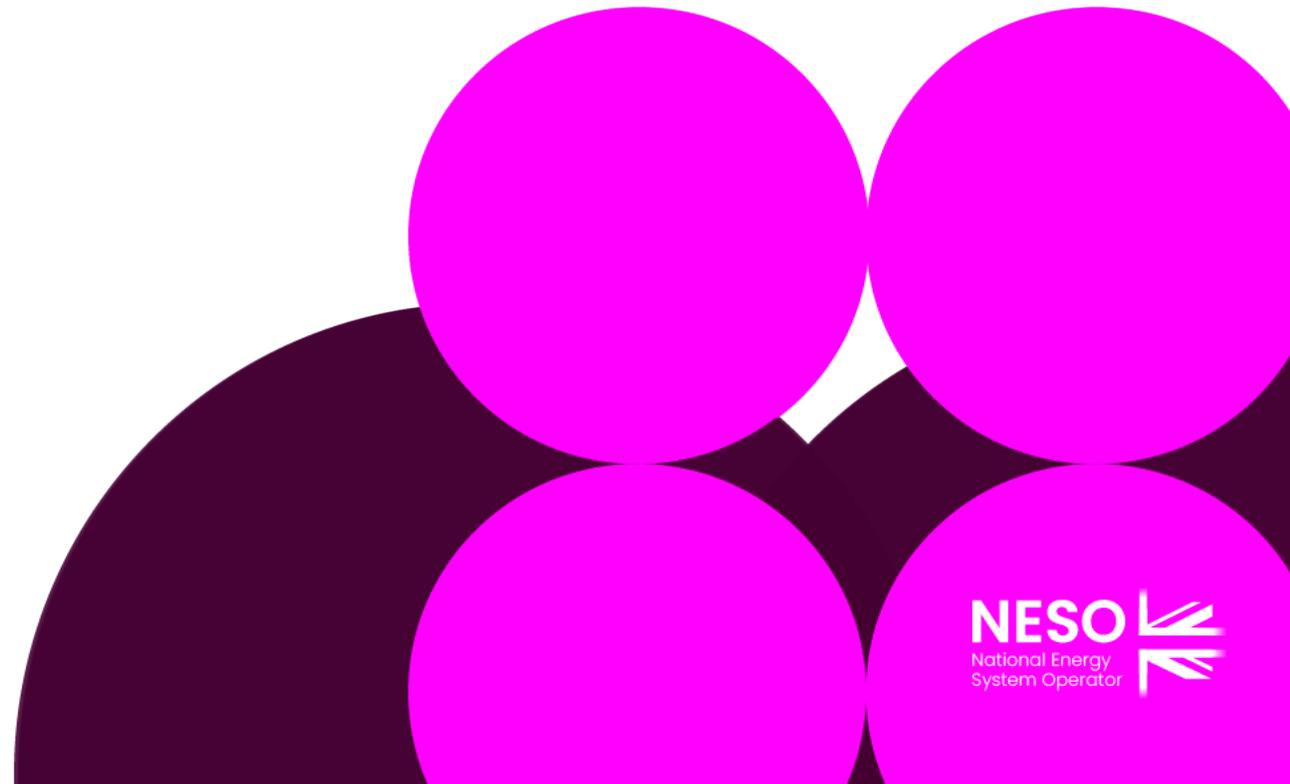
Workgroup Term of Reference	
a)	Consider EBR implications
b)	Consider the scope of work identified and whether this is achievable within the timeframe outlined in the Ofgem Urgency decision letter.
c)	Consider the legal and practical implementation of this modification alongside CMP434/CMP435 and any 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
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
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
19	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.	Open
20	A Workgroup member has agreed to update the table for 'Action 12 – Version 2' to include scenarios where the 'Export capacity' is at zero in both the 'Existing' and 'New'.	Open
21	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.	Open
22	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.	Open
23	Proposer will check the wording of the proposed legal text, to ensure it does not inadvertently exclude medium sized power stations.	Open
24	In relation to possible consultation questions, a Workgroup member will provide a specific question regarding fault level headroom.	Open

Action updates and follow ups from Workgroup 3

Martin Cahill / Alex Markham - NESO



Public Actions 19/20 – Scenarios

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	No	No	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 connections adding generation

Public Actions 19/20 – Scenarios

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 0MW export capacity	N/A	N/A	4MW	0MW*	No	No	Same
	2	New generation connection with 6MW installed capacity and 0 MW export capacity	N/A	N/A	6MW	0MW*	Yes	No	Different
Changes to an existing connection with 0 MW export and installed capacity below the 5MW threshold	3	Existing connection with 2MW installed capacity increasing to 4MW	2MW	0MW*	4MW	0MW*	No	No	Same
	4	Existing connection with 2MW installed capacity increasing to 6MW	2MW	0MW*	6MW	0MW*	Yes	No	Different
Changes to an existing connection with 0 MW export capacity and installed capacity above the 5MW threshold	5	Existing connection with 6MW installed capacity increasing to 12MW	6MW	0MW*	12MW	0MW*	Yes	No	Different

NOTE: * An ENA Engineering Recommendation G100 (EREC G100) Export Limiting Scheme will be installed to limit the export from customer's site to 0 MW.

Assumptions:

The term "existing connection" means sites which are already energised or are have a contracted DNO connection offer but not yet energised

All of the scenarios listed assume that there are no fault level issues at GSP, where fault level issues are known the connection cannot be energised until such time as rectified

All of the scenarios listed also apply to existing demand connections seeking to add generation

Action 22 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 23 Legal Text

(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."

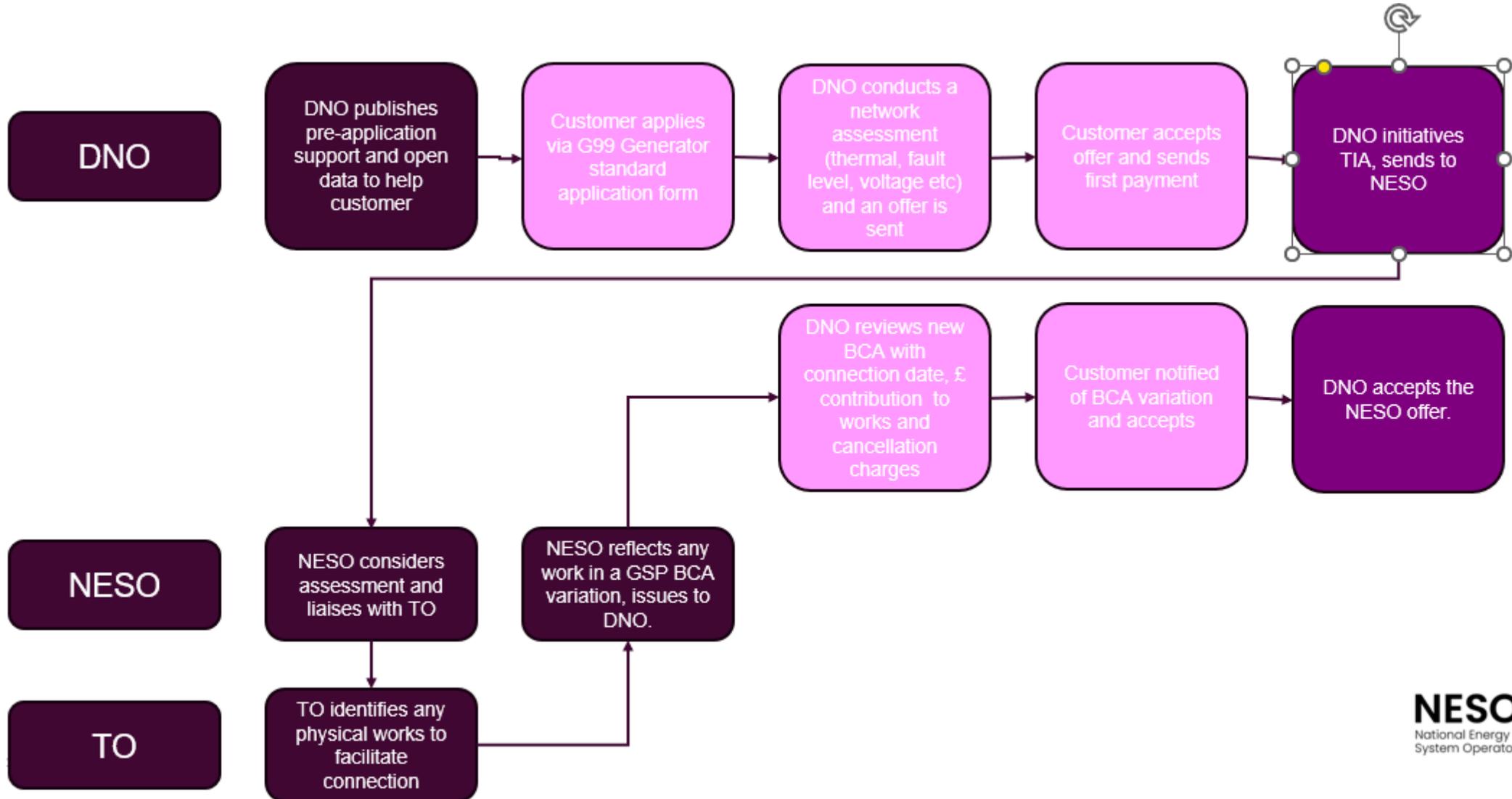
Further Information on DNO Process

- Customer Application: Entry requirements for Dx were raised on 01 January.

<https://www.energynetworks.org/publications/new-distribution-queue-entry-requirements>

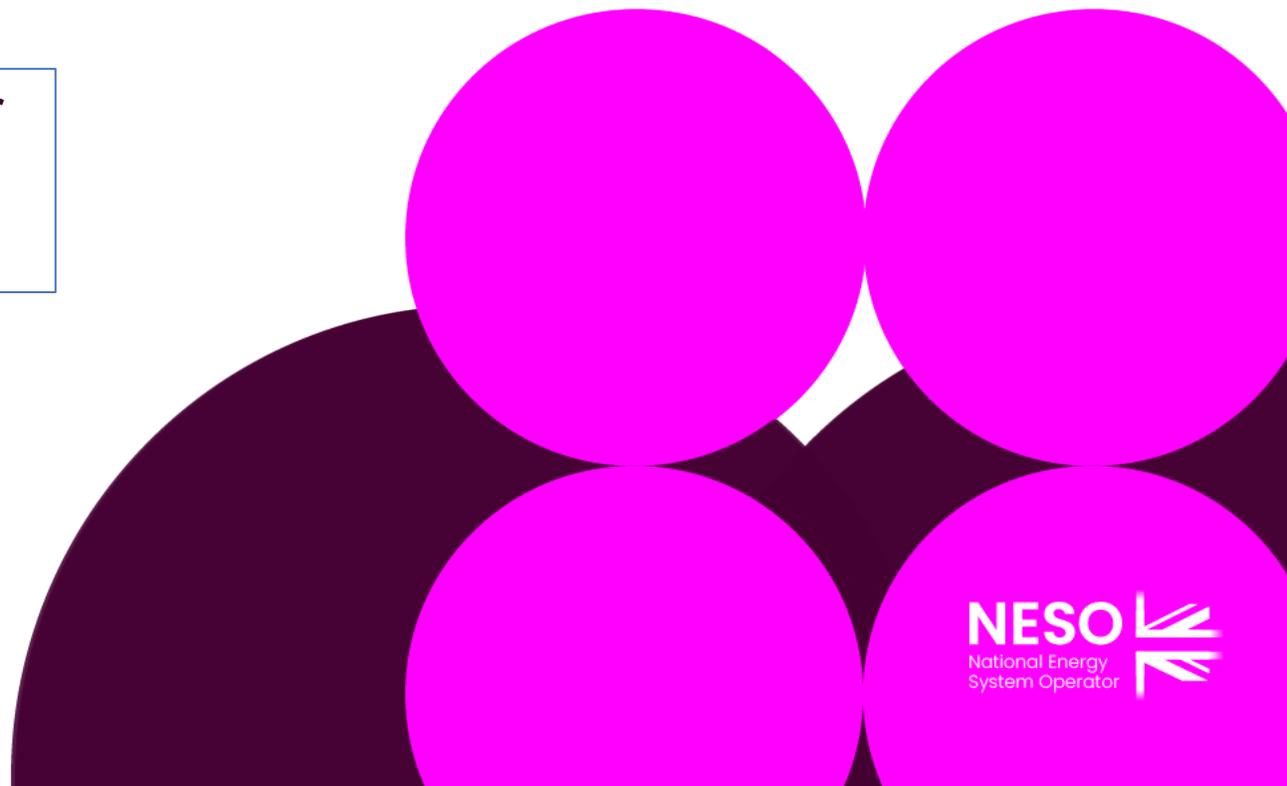
- DNO Assess project (Thermal / Fault level) and design's D aspect of the works. (D reinforcement works)
- Order sent to customer subject to TIA (where applicable) and accepts offer.
- DNO initiates Transmission Impact Assessment (TIA) to NESO.
- NESO considers assessment and engages with TO
- TO identifies any physical works to facilitate connection.
- NESO reflects any work in a GSP BCA variation, issues to DNO.
- DNO reviews new BCA with new information, notifies customer and accepts offer.

Further Information on DNO Process



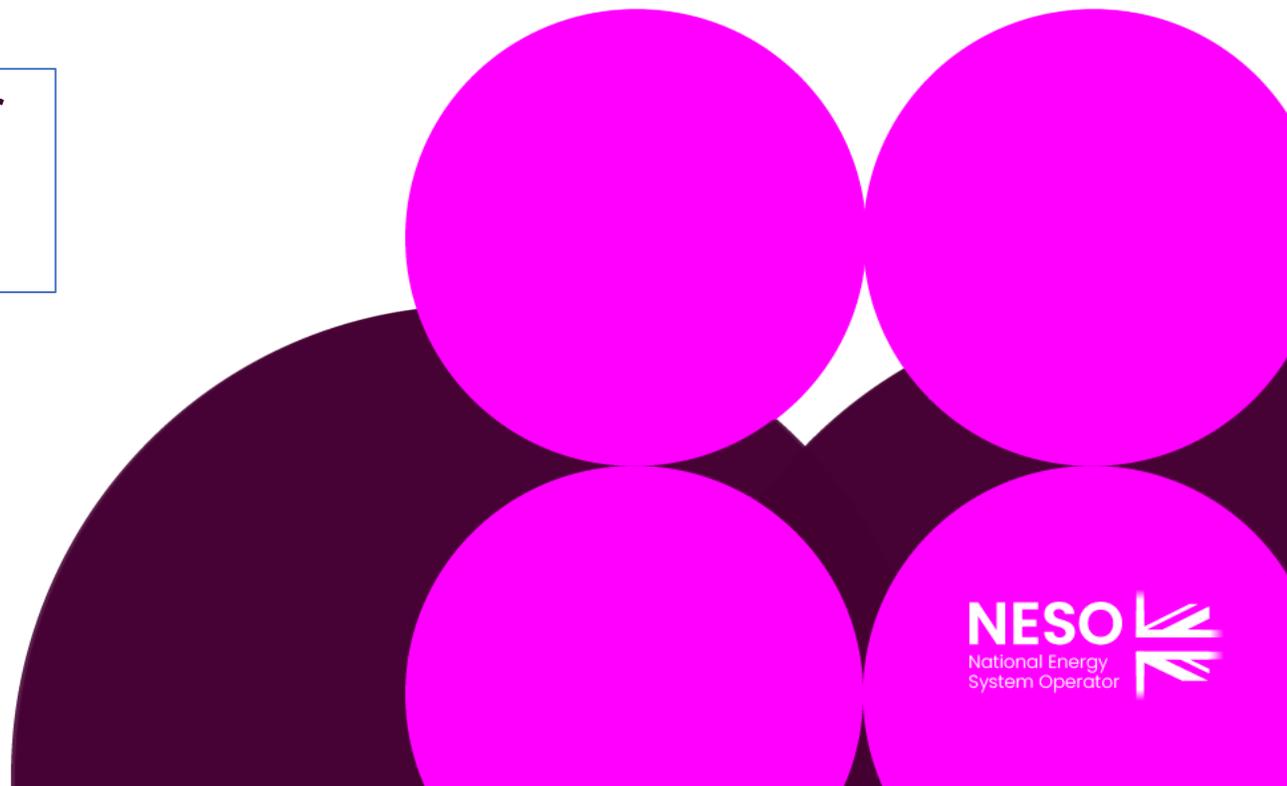
Workgroup Consultation Update

Milly Lewis – NESO Code Administrator



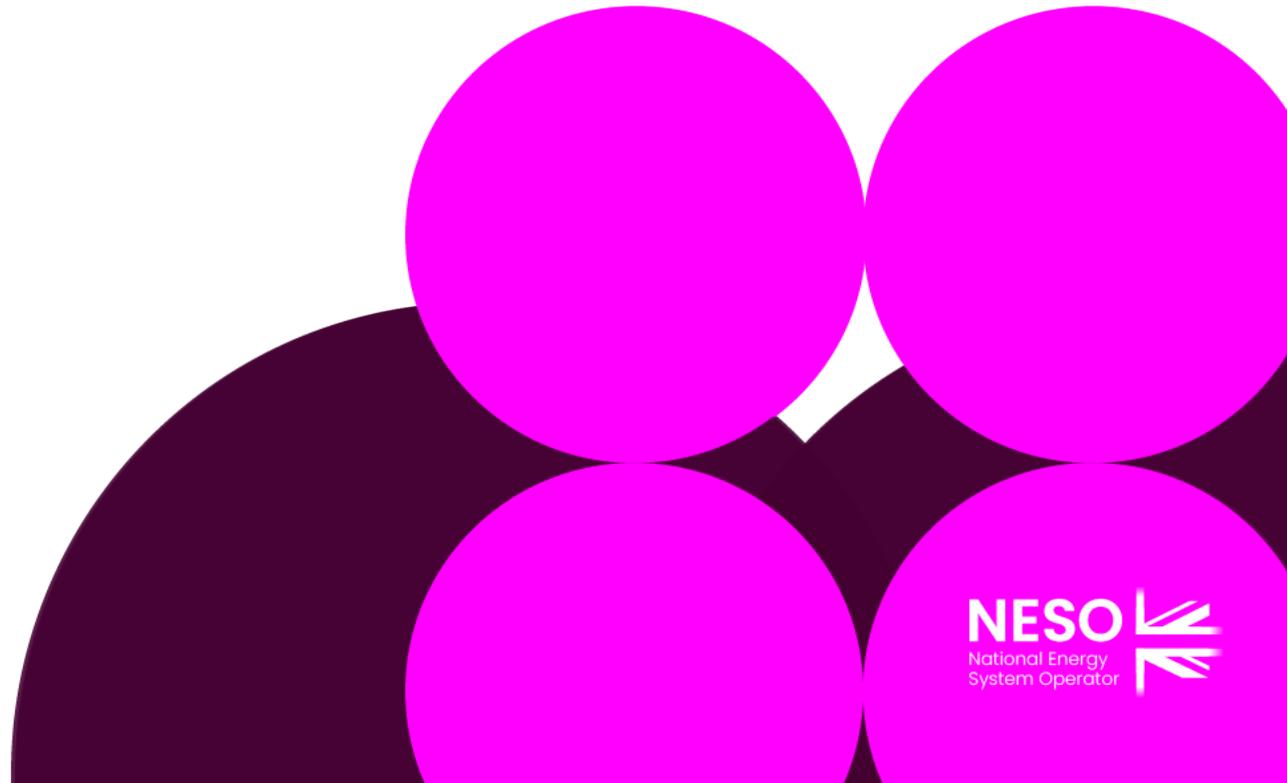
Any Other Business

Milly Lewis – NESO Code Administrator



Next Steps

Milly Lewis – NESO Code Administrator



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