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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@nationalenergyiso.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@nationalenergyiso.com or cusc.team@nationalenergyiso.com

Respondent details	Please enter your details	
Respondent name:	Jack Purchase	
Company name:	National Grid Electricity Distribution	
Email address:	Jack.purchase@nationalgrid.com	
Phone number:	Click or tap here to enter text.	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> 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:

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence*;
- 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;
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency **; and

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d) 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.

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 <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D
		Alternative Request 1 <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		Click or tap here to enter text.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		NGED is supportive of the modification to raise the threshold to 5MW.
3	Do you have any other comments?	CMP446 might drive smaller generators towards connection outside the transmission impact assessment process. One unresolved element of CMP446 is that it will fill transmission capacity at connection asset sites, without a clear methodology to apportion costs between customers. NGEDs proposed approach for amending the CCCM would clarify where these costs would fall (capacity for non-TIA projects would be explicitly carved out and socialised). We are committed to continuing discussions with Ofgem on this matter.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/> No
		Click or tap here to enter text.
5		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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	Does the draft legal text satisfy the intent of the modification?	It does but NGED would want to see clarity around fault level headroom included in the legal text. As it is currently worded it is not sufficiently clear that a generator under the threshold may be subject to a TIA where there is insufficient fault level headroom.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No NGED does not believe this will affect the Electricity Balancing Regulation (EBR) Article 18.

Specific Workgroup Consultation questions

7	Do you believe that a codification of Scotland threshold is required for CMP446?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No NGED believes that there should be consistent treatment of all customers, but ultimately that this would be a matter for the Scottish TOs and DNOs.
8	Is it clear that the change in threshold is cumulative not incremental?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No It is clear, but rather than cumulative we would suggest overall or total are used to improve clarity.

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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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No We believe that this is the correct level for the threshold. NGED has no preference as to the use of the Registered Capacity or Export capacity definition to set this threshold. NGED recognises the safety concerns highlighted by NGET and the importance of aligning across the DNO community. This topic should be discussed further to ensure engineering consensus. We recognise the merits of both approaches but expect the governance process to land on a single approach across all DNOs/TOs.
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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Not at present.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No We agree with this position

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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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No No, we recognise that CMP446 can still progress independently of any delays to the wider connections reform. Should there be a delay to CMP434 or CMP435 DNOs may see an additional increase in applications looking to progress their projects by avoiding delays to Connections Reform.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No There could be an increase in the number of connection applications submitted where the installed capacity is less than 5MW and a rise in the number of accepted connections requesting a reduction in capacity, particularly for those projects that have a registered capacity close to the proposed threshold.
14	Do you have any suggestions for any additional mitigation measures for the identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No See socialisation of associated transmission costs.
15	Do you understand that as a consequence of CMP446 that the curtailment assumptions for an accepted Technical Limits offer could be impacted?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No We understand that there may be a requirement for technical limits to change and that potential curtailment limits could alter.

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16	Is the timeline of interactions understood?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>Yes, we understand the interaction and note that the full benefit of this modification would be realised if it can be incorporated into the CSUC prior to the implementation of CMP435. We also recognise that CMP446 can still progress independently of any delays to the wider connections reform.</p>
17	Do you believe it is appropriate/ within scope of CMP446 for the Workgroup to consider this further, and if so why?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<p>No, we do not believe this is within scope or appropriate for the Workgroup to discuss. It is the responsibility of the DNOs to operate an efficient and effective network. To do this DNOs will assess the network in line with current design methodologies to identify the most appropriate voltage level for any connection.</p> <p>It is important to note that this proposal would limit the ability of many existing larger demand customers connected above 11kV to install generation 'behind the meter' without delay due to transmission constraints. We feel these customers would be unfairly disadvantaged if this change to the proposal were to be progressed.</p>