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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](mailto: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](mailto:milly.lewis@nationalenergyiso.com) or [cusc.team@nationalenergyiso.com](mailto:cusc.team@nationalenergyiso.com)

Respondent details	Please enter your details	
Respondent name:	Ciaran Fitzgerald	
Company name:	ScottishPower Renewables	
Email address:	cfitzgerald@scottishpower.com	
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Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" 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*)

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**For reference the Applicable CUSC (non-charging) Objectives are:**

- a) *The efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence\*;*
- b) *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;*
- c) *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*\*; and*
- 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 type="checkbox"/> C <input checked="" type="checkbox"/> D
		Alternative Request 1 <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		Overall, we see this as a positive change which can better facilitate competition. It will give smaller generators, which may require shorter development timescales and have complex funding models, a more straightforward path to connection. This will increase the likelihood of these projects developing successfully and connecting, which brings additional competition.  Through the workgroup discussions, it has been discussed that the network impact will be minimal, due to the relatively small cumulative capacity of the projects that will benefit from the change. This will increase the efficiency of the process, by removing the obligation for NESO and the TOs to facilitate and carry out the TIA assessments

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		<p>for these projects. Resource freed up from this can then be utilised for the timely completion of the remaining TIA assessments.</p> <p>We support for Alternative 1 as we believe that using 'Export Capacity' is more appropriate than Registered Capacity. This is because the power exported by the generator onto the network should never exceed the contracted export capacity, and therefore it is the relevant value to use. The registered capacity could be higher but would not be reflective of the power being exported onto the network.</p> <p>As identified in the answers to these other consultation questions, there remains areas of improvement and risks to be managed. The proposal should provide outline a timeline for codifying the threshold in Scotland and identify a process for tracking and mitigating the risks identified in the consultation document and responses.</p>
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>For the benefits to be fully realised, we agree that the modification has to complete prior to the Gate 2 window opening.</p>
3	Do you have any other comments?	N/A
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 <a href="#">Workgroup Consultation Section</a> ) <input checked="" type="checkbox"/> No <p>Click or tap here to enter text.</p>
5	Does the draft legal text satisfy the intent of the modification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Click or tap here to enter text.</p>
6	Do you agree with the Workgroup's assessment that the modification does not impact the European Electricity Balancing	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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	Regulation (EBR) Article 18 terms and conditions held within the Code?	I agree with the workgroup's assessment that the modification does not impact the EBR Article T+Cs held within the code.
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### 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  It would be preferable to have a harmonized approach across GB, with the threshold being codified, or not, across Scotland, England and Wales. If the decision is taken to codify the threshold in England and Wales, then a timeline should be set out for Scotland to do the same.
8	Is it clear that the change in threshold is cumulative not incremental?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  I think this is clear and the table in Figure 3 sets this out effectively.
9	Do you believe 5MW is the correct threshold and if not why and to what threshold level should it be?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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	(Providing rationale and justification for any alternative MW threshold)	<p>No specific objections to the 5MW limit. I agree with the statement in the report that the workgroup have not discussed whether this is the correct threshold. Whilst there is some analysis in the proposal form around the use of a 10MW limit, this could be developed further.</p> <p>To better inform discussion over whether 5MW is the correct limit, it would help to have data on how much capacity would be relieved of the TIA process for each potential limit, i.e.:</p> <table border="1"> <thead> <tr> <th>Threshold</th> <th>Capacity 'freed' from TIA process</th> </tr> </thead> <tbody> <tr> <td>3MW</td> <td>??</td> </tr> <tr> <td>4MW</td> <td>??</td> </tr> <tr> <td>5MW</td> <td>852 MW</td> </tr> <tr> <td>6 MW</td> <td>??</td> </tr> </tbody> </table>	Threshold	Capacity 'freed' from TIA process	3MW	??	4MW	??	5MW	852 MW	6 MW	??
Threshold	Capacity 'freed' from TIA process											
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6 MW	??											
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?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>										
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?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Given the safety implications raised on the workgroup about the sites with fault level headroom issues, it is difficult to argue that projects impacting at these GSPs should not be subject to the TIA.</p> <p>However, this creates a level confusion and is an argument against codifying the increased threshold. It's also clear from the discussions that the list of affected sites is subject to change. If there are sites which create 'exceptions' to the 5MW threshold, then the workgroup should agree on a clear process for highlighting this to potential customers. Understanding the sites which will require a TIA in</p>										

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		advance, could help inform small developers, eg. community generation, where to site their potential project.
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 <p>There is a risk that total capacity of projects below the threshold is not evenly distributed, and the immediate or future impact of the mod is that projects &gt;5MW are more significantly affected in certain areas than in others. There is evidence of the distribution of these projects being unevenly distributed in the proposal form.</p> <p>The proposal outlines that projects who are currently contracted but not connected, and have capacity between 1-5MW, will have contracts updated to remove elements and works associated with the TIA process. It isn't clear what happens with those works, if they are funded and if they should continue. It is also not clear why these works are seemingly no longer required, having previously been identified as being necessary. There is a risk that this approach has unintended consequences if not fully considered.</p> <p>It is important that the issues raised on pages 18, 19 and 20 and highlighted in Annex 8 (eg.. impact on LIFO stacks, ANM schemes and technical limits) are considered prior to implementation. These issued are flagged as questions and/or risks, which still need to be answered/mitigated. The proposal should be able to withstand legal challenges from already contracted/connected parties.</p>
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 <p>It is reasonable to expect that any projects which would otherwise have been slightly above 5MW, would now do a cost-benefit exercise to explore whether reducing the capacity below 5MW is beneficial. Without knowing the outcome of that analysis, it is difficult to say whether it would be beneficial and at what capacity (i.e 6MW/7MW), it no longer becomes a worthwhile reduction. If it proves that it would balance out as a benefit for projects which would have been between 5 and eg. 6.5MW capacity to reduce to below 5, then it should be assumed that most projects would reduce their capacity and increase the volume of applications of below 5MW.</p>

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14	Do you have any suggestions for any additional mitigation measures for the identified risk?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Removing the need for the TIA makes the application process easier, quicker and likely cheaper for the applicants, It is not clear how you can prevent or limit customers from taking advantage of this opportunity if it has been agreed and put into code. The mitigation must be a robust method for monitoring and reviewing the cumulative capacity of these projects, on both a GB-wide and local level, so that it can be quickly addressed if required. It could be beneficial to identify now a volume of projects connecting below the threshold that would trigger a review of the threshold.
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  This is understood from the consultation but should be highlighted as a negative consequence of the modification.
16	Is the timeline of interactions understood?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Click or tap here to enter text.
17	Do you believe it is appropriate/ within scope of CMP446 for the Workgroup	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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	to consider this further, and if so why?	We believe that following this approach would create even greater disconnect between the approaches taken in England and Wales and that in Scotland.
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