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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:	Pete Aston	
Company name:	Roadnight Taylor	
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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 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 checked="" type="checkbox"/> Other (Consultancy)

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 type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input 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
		<p>a. Alternative 1 is more efficient, as using export capacity is easier than Registered Capacity</p> <p>b. Alternative 1 certainly better facilitates competition and takes more sites out of needing a TIA than the Original proposal</p> <p>c. Alternative 1 is as neutral as the Original, so there is no tick for either option in this revised version</p> <p>d. Again, export capacity is marginally easier to implement in CUSC than Registered Capacity</p>
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes
		<input type="checkbox"/> No
		Click or tap here to enter text.

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3	Do you have any other comments?	We support Alternative Request 1 using Export Capacity, rather than the Original Proposal using Registered Capacity / Installed Capacity
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	Does the draft legal text satisfy the intent of the modification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes, provided that the legal text for Alternative Request 1 is used
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 Click or tap here to enter text.

Specific Workgroup Consultation questions

7	Do you believe that a codification of Scotland threshold is required for CMP446?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No This modification is specifically for England and Wales and should focus on this region only. It will be necessary to codify the limit in Scotland in due course, through a separate modification, to ensure that generators and demand users with on-site generation are treated the same across GB.
8	Is it clear that the change in threshold is cumulative not incremental?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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		<p>Yes, the consultation is clear that the threshold is cumulative, i.e. it is the total generation capacity at a site that is assessed, rather than the capacity of any individual connection application, which we agree with.</p> <p>However, the consultation (on page 15) states that the threshold should “not take into account any netting off of any associated Demand at that site.” We prefer the approach proposed in Alternative Request 1 to use Export Capacity, rather than Registered Capacity. When using Export Capacity, any demand on site should be netted off against the output of the generator, to determine the export capacity. Also, a generator should be able to install an Export Limiting Scheme in order to control the export and keep the export under 5MW.</p> <p>Netting off the demand against the generator output is very important for industrial decarbonation given the site may require a back-up generator and/or renewable generation on site to reduce operational costs through a decrease in kWh purchased through the wholesale market.</p>
9	<p>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)</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>5MW is the correct threshold, provided it relates to export capacity, as it strikes a balance between allowing some schemes to proceed without a TIA, and not having too great an impact on the transmission system. It particularly benefits community energy schemes and businesses trying to decarbonise their sites.</p> <p>However, we do not agree with the proposed approach of using Registered Capacity, as this will unnecessarily cause some sites to need a TIA. We support Alternative Request 1, using Export Capacity, for the following reasons:</p> <ul style="list-style-type: none"> • DNOs currently use Export Capacity in the Appendix G submissions. If a generation installs 8MW behind the meter but only applies for 4.9MW export, the DNO would use 4.9MW in Appendix G. The same basis should be retained for assessing the new 5MW TIA threshold. • The increased fault infeed from a higher installed capacity than the 5MW Export Capacity threshold is dealt with by the proposal to require all generators to go through a TIA when the fault level headroom is less than 1kA. Note that a PV farm with an installed capacity of 8MW but an export capacity of 4.9MW will have a significantly lower fault infeed than a 4MW installed capacity synchronous machine, so

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		<p>there seems no fault infeed justification to prevent using Export Capacity.</p> <ul style="list-style-type: none"> Using Registered Capacity would hamper the decarbonisation ambitions of some businesses, who have the opportunity of installing more than 5MW of renewable generation behind the meter of their site. For example, a 5MW EV charging facility may want to install a 10MW solar farm behind the meter combined with a small (non-grid importing) BESS scheme, with a <5MW export capacity. This should be allowed under this proposal, and using Export Capacity as the threshold facilitates this.
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 <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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>We agree with this in respect of the first part of the statement, that where there is a GSP with <1kA fault level headroom the new threshold should not apply and generators should go through a TIA.</p> <p>However, there should be consideration of lower threshold for fault level constrained sites, where generators do not need to go through a TIA. For example, we do not believe NGET would want to be informed of every domestic roof top solar scheme where there is a fault level headroom of <1kA. So there should be a defined threshold in such cases, which is most sensibly considered as a kA fault infeed threshold, rather than a capacity threshold, as some technologies have a much higher infeed than others for the same capacity. This should be considered in this code modification, otherwise DNOs will make their own assumptions as to what should and shouldn't be submitted for a TIA when there is no fault level headroom, and the industry wants consistency wherever possible.</p>
12	Do you agree that the Workgroup has identified the relevant risks if	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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	<p>CMP446 is approved. If not, what further risks haven't been identified yet, and why are they relevant?</p>	<p>The consultation appears to cover the major risks, but one additional risk is the increase in SGT reinforcement contributions for schemes 5MW and above. In areas where SGT reinforcement is being charged to DNO customers, the cost is split proportionally between the capacity of accepted schemes triggering the reinforcement. If <5MW generators are removed from needing to contribute towards such SGT reinforcement (which is a positive outcome for the <5MW generators), the cost for the remaining customers will increase. The solution to resolve this is to remove the need for DNO customers to contribute towards SGT reinforcements. We support further industry discussion on this topic as a matter of urgency given the wide-reaching implications.</p>
<p>13</p>	<p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Yes there will likely be an increase, as per the following points:</p> <ul style="list-style-type: none"> The consultation notes that c.852MW of schemes in the queue will benefit from this increase in TIA threshold. Even if levels of applications for 1-5MW generators don't increase, there will continue to be applications made for generators of this size at the historic rate, so the MW level of generators not requiring TIA will gradually increase. However, this should be seen as a <u>positive</u> outcome and not as a risk. There will also be some existing schemes in the queue in the 5-10MW range that will look to reduce to <5MW to make use the new threshold. DNOs will need to fairly apply the material / allowable changes guidance, to allow generators to do this, provided there is no change to the connection POC by doing so. This will also increase the total MW of schemes progressing without a TIA, which should be seen as a <u>positive</u> outcome. There may potentially be an increase in applications for generators that are unable to progress with a larger generation scheme, and wanting reapply to split it up into multiple <5MW schemes. Whilst it is possible some developers may do this, it is likely that DNO network capacity and design philosophy will naturally limit the extent that this will be possible.
<p>14</p>	<p>Do you have any suggestions for any additional mitigation</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

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	measures for the identified risk?	
		As referenced above, DNO network capacity will naturally limit the potentially for multiple smaller projects having a detrimental impact on the transmission network.
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
		<p>The impacts on curtailment are believed to be as follows:</p> <ul style="list-style-type: none"> • DNO LIFO queues (for distribution constraints) will not be impacted, as the 1-5MW generators will remain within the LIFO queue. DNO curtailment levels could potentially improve if existing schemes in the queue above 5MW reduce their capacity to <5MW. • The impact on Technical Limits is harder to assess. By removing <5MW schemes from Appendix G, the Technical Limits MW level will reduce (because it is calculated from generators in Part 1 and 2 of Appendix G), but the MW level of schemes being controlled by TL will correspondingly reduce. Yet the 1-5MW generation will still be there in the background adding to the power flows through a GSP, potentially impacting on curtailment. However, given the volume of 1-5MW schemes, the impact is likely to be small in most cases, particularly when compared to the anticipated impact of Connection Reform measures and the need to reassess TL solutions following the G2TWQ process. • Depending on the impact on 5MW+ customers, it may be worth leaving <5MW customers in the Transmission ANM / Technical Limits LIFO queue, whilst not requiring them to go through a TIA. The DNOs should undertake a review of the potential impact on curtailment. This mod should be clear as to whether 1-5MW schemes should or shouldn't be included in Transmission ANM / Technical Limits schemes.
16	Is the timeline of interactions understood?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Click or tap here to enter text.

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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 it is appropriate for this mod to reference voltage level in reference to the 5MW threshold. This is because DNOs need to be able to make the most appropriate connection decision in relation to each individual connection. There may be some 4.9MW schemes that are most suitable to connect at 11kV, but there may be some circumstances where a 33kV connection is best (e.g. where there is no 11kV infrastructure nearby). Putting a clause in this mod in relation to voltage level may conflict with other DNO requirements to provide the minimum scheme and to develop an economic and efficient network, and it would unnecessarily exclude schemes connecting above 11kV from benefiting from the threshold change.</p> <p>This mod should be clear that it references connections to distribution voltages, as it is understood that there are some transmission connections (albeit a small level) at <5MW level.</p>