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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:	Helen Stack	
Company name:	Centrica	
Email address:	helen.stack@centrica.com	
Phone number:	07979567785	
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 checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D
		Alternative Request 1 <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D
		For both the Original and Alternative Request 1, we agree with the respective Proposer’s assessment against the CUSC Non-Charging Objectives.  Both the Original and Alternative Request 1 could potentially better facilitate compliance with the Electricity Regulation by removing disincentives for self-generation.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No
		Click or tap here to enter text.
3	Do you have any other comments?	No – all additional comments are captured under the other questions.

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4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input checked="" type="checkbox"/> Yes (the request form can be found in the <a href="#">Workgroup Consultation Section</a> ) <input type="checkbox"/> No  <p>Our Alternative Request would set a higher threshold of 10MW for generation connecting to the 11kV network and below – where projects have the least impact on the Transmission Network.</p> <p>This would allow public sector, manufacturing, other industrial &amp; commercial and community energy projects connecting at 11kV or below to choose the most efficient decarbonisation options for their sites.</p> <p>At 33kV and above, the threshold would remain at 5MW as per the Original Proposal.</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 Regulation (EBR) Article 18 terms and conditions held within the Code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <p>Click or tap here to enter text.</p>

### 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
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		<p>We do not believe codification of the threshold in Scotland is required for CMP446. Expanding the scope of CMP446 could delay implementation, and we keen to see CMP446 implemented in line with the Connections Reform package timings.</p> <p>We'd support further review of the threshold in Scotland, but outside of CMP446.</p>
8	Is it clear that the change in threshold is cumulative not incremental?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
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)	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>We prefer a threshold of 10MW.</p> <p>In recognition of Workgroup discussion around the risks of raising the threshold further, we are proposing an alternative that would increase the threshold to 10MW on the High Voltage networks only. That means the networks which are 11kV and below, where projects have the least impact on the Transmission Network.</p> <p>This would allow public sector, manufacturing, other industrial &amp; commercial and community energy projects to choose the most efficient decarbonisation options for their sites.</p> <p>Allowing this additional flexibility at 11kV would create greater opportunities for cost-reduction, jobs, growth, and other local benefits, as well as maximising contributions to net zero.</p>
10	Are there any other generic scenarios (over and above those shown in Figure 2 and Figure 3 (Annex 7) that	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>

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	need to be considered by the Workgroup, please provide details of them and explain why they are relevant?	<p>No, but noting that should the Workgroup agree to further development of our Alternative Request, the scenarios could show how different thresholds could be applied Extra High Voltage (EHV) and High Voltage (HV) levels.</p> <p>However, I'm not convinced that this would be necessary to show in table form, as the underlying scenarios remain the same.</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>This is reasonable.</p>
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?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>The Workgroup has identified a comprehensive list of potential risks. We believe most of these risks are over-stated or have existing mitigations (for example the LIFO stack still applies).</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?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>There may be an initial increase in projects between 1-5MW coming forward from the pool of decarbonisation projects previously held back by the 1MW limit. We expect these to be mostly businesses or the public sector seeking to add on-site generation. These are projects connecting at lower voltages which have minimal impact on the Transmission Network.</p> <p>After an initial 'bump' of these 'held back' projects we believe application rates would settle down.</p> <p>We believe several factors will act as a disincentive against standalone generation projects using the 5MW threshold as</p>

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		<p>loophole. Mainly, the financial incentive to do this is low because such small projects lack the economies of scale of larger developments. We believe recent case law also effectively prevents developers dividing a larger project into multiple 5MW adjacent projects.</p>
14	<p>Do you have any suggestions for any additional mitigation measures for the identified risk?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>We don't believe that further mitigation is needed beyond the existing mitigations noted in the consultation. We feel the perceived risks have been overstated and are outweighed by the benefits of CMP446.</p>
15	<p>Do you understand that as a consequence of CMP446 that the curtailment assumptions for an accepted Technical Limits offer could be impacted?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
16	<p>Is the timeline of interactions understood?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
17	<p>Do you believe it is appropriate/ within scope of CMP446 for the Workgroup to consider this further, and if so why?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Not beyond the discussions that have already taken place. We think this is a separate issue.</p>

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