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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@nationalenergyso.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@nationalenergyso.com or cusc.team@nationalenergyso.com

Respondent details	Please enter your details	
Respondent name:	Grahame Neale	
Company name:	Lightsource bp	
Email address:	Grahame.Neale@lightsourcebp.com	
Phone number:	07741158820	
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
		We agree with the proposer's assessment of the Original solution and believe these are the same for alternative as well.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Yes, we agree with implementing this proposal alongside the broader connections reform changes.
3	Do you have any other comments?	We would like to understand further how GSPs with a lowered TIA threshold (e.g. as a result of the factors described in question 11) would be considered against the Clean Power 2030 Action Plan technology caps. Based on current drafting, it would still be possible for a <5MW project to be subject to a TIA and contribute towards the CP30 capacity caps. We would question whether it would be fairer for all if projects in this situation were subject to the TIA (and the associated works) but not counted towards the CP30 capacity caps.

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		In terms of 'Registered Capacity' or 'Export Capacity' being used as the basis of this proposal, we believe Export Capacity is the better one to use as it more closely aligned to the concept of TEC (Transmission Entry Capacity) used at transmission and more accurately reflects the maximum export of the generator on to the distribution network (i.e. after actions undertaken ANM or other control devices).
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 Workgroup Consultation Section) <input type="checkbox"/> No Please see attached alternative request form.
5	Does the draft legal text satisfy the intent of the modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No We believe the changes to CUSC Schedule 2 Exhibit 1A are sufficient to meet the intent of the modification however we believe the CUSC Section 6 legal text should also confirm the equivalent value for Scotland. As it is currently written, the legal text is incomplete.
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 We agree with the workgroup in this regard.

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 We believe the threshold for Scotland should also be codified so that it is clear from the CUSC legal text what the threshold is and that it is different from the threshold in England and Wales. We agree that it is not in the workgroup's remit to determine what the threshold should
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		<p>be for Scotland (i.e. if 0.2MW is correct or not) but we do believe that the value should be documented.</p> <p>Without this wording, there is no protection for NESO, DNOs or developers from applying a different value for projects in Scotland.</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>
		We believe this is clear in the consultation however this clarity is not translated to the legal text.
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>
		As per our alternative request, we believe applying a blanket threshold across huge swathes of the country is not the correct solution and doesn't capture differences at a local level. Whilst we are not able to determine what the threshold should be at a particular substation and trust that the 5MW value is sufficient in most instances, we believe there needs to more scope for this 5MW value to be revised (increased or decreased) to suit local conditions.
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 checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
		Whilst mostly covered in Figures 2 and 3, for completeness the scenario where a project which increases installed capacity but does not increase export capacity could also be added. It should also be noted that this capacity is technology agnostic and so there is no difference between expanding an existing technology or adding a new technology to the project.
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	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>

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	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?	We agree with this approach from a safety perspective however we do not agree with how the affected GSPs are transparently shared as part of the proposal. We believe that GSPs with different TIA thresholds should be published and regularly reviewed, backed up with a CUSC obligation to do so.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>We agree with the risks highlighted by the workgroup however we would question whether the ~390 projects (and ~852MW of capacity) highlighted as benefiting from this change also includes projects who are just over the revised threshold (e.g. 6-10 MW) and would likely decrease their capacity. From reading the consultation document, we do not believe this is the case and so we believe the impact of this modification will be larger than identified in the consultation.</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>In our opinion, keeping all other things equal we believe CMP446 would likely result in a reduction in the number of projects entering the TIA process at the smallest scales (e.g. <10MW) and an increase in projects avoiding the process by applying for a 4.9MW connection. The number of larger projects (e.g. 10MW+) seeking a connection will not be affected by CMP446 and will more likely be affected by other changes implemented at the same time, specifically the CP30 capacity caps.</p>
14	Do you have any suggestions for any additional mitigation measures for the identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>The NGET suggestion in the workgroup consultation to monitor the number of 1-5MW projects and adjust the TIA threshold accordingly is sensible. This would support our alternative proposal for the TIA threshold per GSP to be published and regularly reviewed.</p>

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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>We understand that as a result of CMP446, the curtailment assumptions provided by DNOs would need to be revised and would likely result in an increase in curtailment for >5MW projects when managing GSP issues.</p> <p>We would like further information from the DNOs on how they intend to implement this without eroding the access rights of larger (>5MW) projects as a greater number of smaller (<5MW) projects connect.</p>
16	Is the timeline of interactions understood?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>We understand the timing interactions between CMP446 and CMP435.</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>Stating a specific voltage of connection for projects of a certain size is not required as the economics of the connection should dictate this.</p>