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CUSC Alternative Form – Non Charging

CMP446 Alternative Request 2:

Change the TIA threshold to 10MW at voltages 11kV and below

Overview: As per the Original, but raising the threshold to 10MW at voltages 11kV and below

Proposer: Helen Stack, Centrica, using 'CBS Energy Storage Assets UK Limited'

☒ I/We confirm that this Alternative Request proposes to modify the non - charging section of the CUSC only



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What is the proposed alternative solution?

The Original proposal intends to improve the current connections process to facilitate the timely connection of Distribution projects that have minimal impact on the Transmission Network to help meet net zero and Clean Power 2030.

The Original proposal would increase the threshold to 5MW across all distribution network voltages.

This Alternative proposes setting a higher threshold of 10MW for generation connecting to the 11kV network and below – where projects have the least impact on the Transmission Network. This would allow public sector, manufacturing, other industrial & commercial and community energy projects to choose the most efficient decarbonisation options for their sites.

We propose the threshold is determined by the Point of Connection (POC).

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. In short, this Alternative has increased benefits relative to the Original proposal, without adding any significant risk.

What is the difference between this and the Original Proposal?

This Alternative proposes a higher threshold of 10MW on the 11kV to 6.6kV High Voltage (HV) networks, which typically connect into homes and businesses.

For the 132kV to 33kV Extra High Voltage (EHV) networks the new threshold would be 5MW, as per the Original proposal.

Suggested draft of the legal text following initial Workgroup discussion:

(f) In England and Wales, it is acknowledged that only an **Embedded Small Power Station** which has a Registered Capacity (as defined in the **Distribution Code** and rounded to one decimal place) of 5MW or above or (if there is less than 1kA of fault level headroom as set out in the Appendix G for the relevant **Grid Supply Point** at the time of the submission of an **Evaluation of Transmission Impact**) 1MW or above if its Point of Connection is at a voltage of more than 11kV or 10MW or above if its Point of Connection at a voltage of not more than 11kV is a **Relevant Embedded Small Power Station** requiring the submission of an **Evaluation of Transmission Impact** to **The Company** in accordance with Paragraph 5.1(a) above.”

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What is the impact of this change?

Proposer's assessment against CUSC Non-Charging Objectives	
Relevant Objective	Identified impact
(a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence*;	Positive As per the Original, but removes additional projects that do not significantly impact the Transmission/Distribution interface further helping efficient discharge of network licence obligations (NESO, NGET and DNOs).
(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;	Positive As per the Original – quicker connections for viable projects needed to deliver Net Zero. But, with additional benefits for supply competition as large consumers are able to benefit from greater on-site generation.
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency **; and	Positive Removes disincentives for self-generation.
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	Positive As per the Original, but goes further in removing obligations on HV-connecting DG that are disproportionate to their impact on the Transmission System.

* 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.

When will this change take place?

Implementation date:

As per the Original Proposal.

Implementation approach:

As per the Original Proposal.

Acronyms, key terms and reference material

Acronym / key term	Meaning
EHV	Extra High Voltage
HV	High Voltage
kV	kilovolt
POC	Point of Connection

Reference material:

1.