

Public

Code Administrator Meeting

Summary

Workgroup Meeting 6 and 7: CMP446 Increasing the lower threshold in England and Wales for Evaluation of Transmission Impact Assessment (TIA)

Date: 19 February 2025, 20 February 2025

Contact Details

Chair: Milly Lewis, milly.lewis@nationalenergyso.com

Proposer: Martin Cahill, martin.cahill@nationalenergyso.com

Key areas of discussion

The Chair noted that the purpose of Workgroup 6 is primarily to:

- Review the current actions.
- Share summaries of the Workgroup Consultation responses and discuss feedback.
- Discuss the Alternative Requests and a potential vote.

Action updates

Action 15 – Communications (action closed during meeting)

The Proposer explained NESO’s communications plan should this modification be approved, highlighting the use of existing communications channels for Connections Reform. A Workgroup Member suggested including engagement with Trade Associations, to ensure wider dissemination of information. The Proposer took an action to consider this suggestion.

Action 24 – Fault Level Headroom considerations (action to remain open)

The Proposer confirmed that Fault Level Headroom considerations had been included in the Workgroup Consultation Document. Since the last Workgroup, NESO had reached a view regarding the interaction between projects between 1 and 5MW at GSPs with no Fault Level Headroom and Clean Power 2030. Under the proposal, these projects will be classed as Relevant Power Stations, included in Appendix G and therefore included in the Clean Power 2030 buckets. Some Workgroup Members questioned whether this was the right approach.

Public

The Proposer confirmed that the draft Legal Text had been updated to clarify the process for Power Stations connecting at GSPs with low/no Fault Level Headroom following feedback from the Workgroup.

The Workgroup agreed that the treatment of projects at varying Fault Level Headroom scenarios should be consistent. The Proposer took an action to share a table with the Workgroup that clarifies the treatment of projects under differing Fault Level Headroom scenarios and to include this in the Workgroup Report. The Proposer also took an action to share updated draft Legal Text.

Action 25 – Fault Level Headroom at GSPs (action to remain open)

The Proposer presented data showing that 22% of sites (40 out of 175 GSPs) have Fault Level Headroom issues, representing 170 MW of the 852 MW connections queue. The Workgroup raised the importance of publishing Fault Level Headroom data to ensure transparency as to what threshold would apply.

The Proposer confirmed that NESO's have agreed to publish the Fault Level Headroom data of sites that fall below <1 kA one month before the gated window opens. The NESO Representative took an action to assess if there is any further analysis that can be shared which demonstrates how the Gate 2 to Whole Queue process could change the list of sites which may need to go through a TIA due to Fault Level Headroom issues.

Action 32 – Technical Limits (action closed during meeting)

The Proposer summarised the interaction between Technical Limits and the Original Proposal, confirming that if this Modification is approved NESO plan to remove projects under the threshold and not yet connected from BCAs and Appendix G. A Workgroup Member noted that curtailment could increase or decrease for projects above 5 MW, dependent on their position in the LIFO stack. The Proposer agreed and suggested that related documentation could be updated to make this clearer.

Workgroup Consultation Responses Summary and Feedback Discussion

The Chair confirmed that two Workgroup Consultation Responses were received as 'confidential' but prior to Workgroup Meeting 6 one asked for theirs to be treated as 'non-confidential' and shared with the Workgroup, with the other is still to be confirmed. The Workgroup voted for them to be included in the analysis with the other non-confidential responses.

The Chair provided an overview of the responses, highlighting the following themes and concerns:

Public

- **5 MW threshold**

The majority of respondents supported the 5 MW threshold but had concerns about the definition of Registered Capacity and the potential for gaming the system. The Proposer confirmed that he was happy to continue using 5 MW as the threshold for his Original Proposal.

The Workgroup stressed the importance of clarity on whether the 5 MW threshold was an absolute number or a number using once decimal place rounded up. The Proposer took an action to issue updated Legal Text that clarifies the decimal point issue.

There was support among Workgroup Members for the Alternative Request 2 which proposed increasing the MW threshold to 10 MW for projects on a High Voltage network.

The Proposer agreed to include additional justification in the Workgroup Report for the choice of a 5 MW threshold and how it was calculated.

- **Definition of Registered Capacity**

The Proposer confirmed that the Original Proposal uses the Distribution Code definition of Registered Capacity, but is looking to get some feedback from the Workgroup before making a final decision whether this or the Grid Code definition should be used. A Workgroup Member noted that any disagreement over the definition used could be addressed by submitting an Alternative Request. The Proposer took an action to share a table that shows the definitions side-by-side along with their impact on the thresholds.

- **Additional scenarios**

The Workgroup reviewed the additional scenarios suggested in the Workgroup Consultation Responses. No changes were made to the existing scenarios, as they were deemed to be already covered, of little impact to the Original Proposal, or related to an Alternative Request.

- **Identified risks**

The Chair summarised the identified risks, grouping them into the following themes:

- **Geographical connection**

The Workgroup agreed that the risks around different thresholds in England and Wales compared to Scotland had been adequately captured by the Original Proposal. It was agreed that the rationale behind the urgency of the modification should be clarified in the Workgroup Report.

- **Fault Level Headroom**

The Workgroup agreed that this is a known risk and has been adequately covered

Public

by earlier discussions, particularly the previously agreed action to include a table on Fault Level Headroom in the Workgroup Report and the updated Legal Text.

- **SGT Reinforcement Contribution**
The Workgroup agreed that this was a known defect in the CUSC and there is support for it being resolved, but it is outside the scope of this modification.
- **Customer Contracting**
The Workgroup agreed that this risk is addressed by an Alternative Request which is based on Export Capacity rather than Registered Capacity.
- **System Accommodation**
The Workgroup discussed risks related to system accommodation, concluding that these risks were already covered but may need to update Workgroup documentation.
- **Connection Reform Delay**
The Workgroup agreed that while there is a risk of delay, given the 'Minded To' position has been shared, there is now less of a risk.

- **Suggested Risk Mitigations**

The Workgroup reviewed suggested mitigations for identified risks:

- **Scotland codification** – the consensus of the Workgroup was that the defect relates specifically to England and Wales and codification in Scotland was outside the scope of this modification.
- **Identification of impacted projects** – no further mitigation was identified by the Workgroup, the Proposer confirmed he was happy this was covered by the Original Proposal.

Other risks identified in Workgroup Consultation Responses:

Response 4 – the Workgroup concluded that this was out of scope of the Original Proposal.

Response 9 – the Proposer confirmed that NESO doesn't believe there is a clear case for addressing this risk specifically and the risk of projects exploiting this risk is limited.

Response 13 – the Chair stated that this risk has been adequately addressed.

Response 17 – the Chair confirmed that this risk has been addressed in an Alternative Request.

Response 20 – the NGED Workgroup Member noted that socialisation of associated transmission costs is addressed by an Alternative Request.

Alternative Requests

Alternative Request 1

Public

The Workgroup discussed Alternative Request 1. The Alternative Request Proposer confirmed the key point of differentiation was the use of 'Export Capacity' rather than 'Registered Capacity'.

Alternative Request 2

The Workgroup discussed Alternative Request 2. The Alternative Request Proposer confirmed the key point of differentiation was the use of a 10 MW threshold at 11 kV. Some Workgroup Members shared their concerns over a higher threshold at a lower voltage and the potential for an influx of projects at the higher threshold.

The Alternative Request Proposer stated that they had also submitted a new Alternative Request (Alternative Request 4) which combines Alternative Request 1 and 2.

The Chair confirmed that in the interests of time, the Workgroup will need to reconvene to continue the discussion on the remaining Alternative Requests.

Next Steps

The Workgroup will reconvene on 20 February 2025 to continue discussions on the Alternative Requests and a potential vote.

Alternative Requests

The Chair reconvened the Workgroup Meeting on 20 February 2025 to continue discussing the remaining Alternative Requests.

Alternative Request 3

The Workgroup discussed Alternative Request 3. The Alternative Request Proposer confirmed the key point of differentiation was the focus on transparency and visibility of the TIA threshold at different points in the network, without changing the TIA thresholds or how they are calculated.

Alternative Request 4

The Workgroup discussed Alternative Request 4. The Alternative Request Proposer confirmed that this Alternative Request is a combination of Alternative Request 1 and 2.

Alternative Request 5

The Workgroup discussed Alternative Request 5. The Alternative Request Proposer confirmed the key point of differentiation was the introduction of a cap on the capacity of projects benefiting from the raised threshold to balance the benefits and risks, with a proposed cap of 25 MW per GSP per five-year period.

Public

Alternative Request 6

The Proposer of Alternative Request 5 introduced a new Alternative Request which combined Alternative Request 5 and Alternative Request 1, modifying their original Alternative Request by using 'Export Capacity' rather than 'Registered Capacity'. The Workgroup agreed to vote on this new Alternative Request 6, with the formal Alternative Request Form to be shared with the Workgroup at the conclusion of this Workgroup meeting.

Workgroup Alternative Request Vote

The Chair carried out a vote for each Alternative Request. The Chair confirmed that she would consider whether to save the Alternative Requests that were not supported in the vote, providing the Workgroup with her decision and sharing the following rationale after the conclusion of the Workgroup meeting. The outcome of the vote was:

Alternative Request 1 – majority of the Workgroup voted **in favour**, to become WACM 1.

Alternative Request 2 – majority of the Workgroup voted **not to support** this Alternative Request.

- **Post meeting update:** The Chair did not save. There was a clear majority for not progressing to a WACM across a variety of industry parties and the majority of the Workgroup Consultation responses did not think it was appropriate to include high voltage within the solution.

Alternative Request 3 – majority of the Workgroup voted **in favour**, to become a WACM2.

Alternative Request 4 – majority of the Workgroup voted **not to support** this Alternative Request.

- **Post meeting update:** The Chair did not save. There was a clear majority for not progressing to a WACM across a variety of industry parties and the majority of the Workgroup Consultation responses did not think it was appropriate to include high voltage within the solution.

Alternative Request 5 – majority of the Workgroup voted **not to support** this Alternative Request.

- **Post meeting update:** The Chair saved. The Workgroup Vote showed no significant majority for progressing or not progressing across a variety of industry parties; the proposal covers concerns of gaming and significant applications being made which have been discussed at length in Workgroup meetings.

Alternative Request 6 – majority of the Workgroup voted **not to support** this Alternative Request.

Public

- **Post meeting update:** The Chair saved. The Workgroup Vote showed no significant majority for progressing or not progressing across a variety of industry parties; the proposal covers concerns of gaming and significant applications being made which have been discussed at length in Workgroup meetings; this alternative provides the option to Ofgem for each of the Original and WACMI on the above.

Actions For the full action log, click [here](#).

Action Number	Workgroup Raised	Owner	Action	Comments	Due by	Status
15	WG2	MC	Confirm the plan for communications for existing projects, whether they do or do not have to do apply for Gate 2.		03/02/2025	Closed
24	WG4	MC	The Proposer took an action to ensure that the fault level headroom considerations are clearly documented in the Workgroup consultation, including any necessary legal text adjustments.	Action to remain open pending new actions and further discussion.	07/03/2025	Open
25	WG4	MC / DC	It was confirmed by NGET that a list of GSPs that have no fault level headroom will be made available next week, and that the Proposer will consider what the enduring solution will be for the list to be made available publicly.	Action to remain open pending new actions and further discussion.	07/03/2025	Open
26	WG4	GG	The Proposer of Alternative 1 took an action to consider changing the terminology within this		07/03/2025	Open

Public

			<p>this proposal from "MVA" to "MW".</p>		
32	WG4	AM	<p>The NESO Representative took an action to revise the wording to make the explanation of technical limits clearer and to include a link to the public-facing rule book. A further discussion will be held with Workgroup Members on this post-consultation.</p>	07/03/2025	Closed
33	WG6	MC	<p>Proposer to consider the inclusion of Trade Associations in the Communications Plan.</p>	24/02/2025	Open
34	WG6	MC	<p>Proposer to share a table with the Workgroup that clarifies the treatment of projects under differing Fault Level Headroom scenarios and to include this in the Workgroup Report.</p>	24/02/2025	Open
35	WG6	MC	<p>Proposer to share updated draft Legal Text with Fault Level Headroom considerations.</p>	24/02/2025	Open
36	WG6	MC	<p>In relation to the 5 MW threshold in the Original Proposal, the Proposer will issue updated Legal Text that clarifies the decimal point issue.</p>	24/02/2025	Open

Public

37	WG6	MC	In relation to the definition of 'Registered Capacity', the Proposer will share a table that shows the Distribution Code and Grid Code definitions side-by-side along with their impact on the MW thresholds.	24/02/2025	Open
----	-----	----	---	------------	------

Attendees

Name	Initial	Company	Role	WG6	WG7
Milly Lewis	ML	NESO Code Administrator	Chair	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Kat Higby	KH	NESO Code Administrator	Technical Secretary	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Matthew Larreta	ML	NESO Code Administrator	Technical Secretary	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Martin Cahill	MC	NESO	Proposer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Alex Markham	AM	NESO	NESO Representative	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Brian Hoy	BH	Electricity North West	Workgroup Member	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Ciaran Fitzgerald	CF	Scottish Power	Workgroup Member	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Daniel Clarke	DC	NESO	Workgroup Member	<input checked="" type="checkbox"/>	
Ed Birkett	EB	Low Carbon	Alternate		<input checked="" type="checkbox"/>
Garth Graham	GG	SSE Generation	Workgroup Member	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Grant Rogers	GR	Qualitas Energy	Workgroup Member	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Helen Stack	HS	Centrica	Workgroup Member	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Jack Purchase	JP	National Grid Electricity Distribution	Workgroup Member	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Joe Colebrook	JC	Innova Renewables	Workgroup Member	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Kate Teubner	KT	Low Carbon	Workgroup Member	<input checked="" type="checkbox"/>	
Kostas Fouskis	KF	Gridserve	Workgroup Observer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Kyle Smith	KS	Energy Networks Association	Workgroup Observer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Kyran Hanks	KH	WWA	Workgroup Member	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Mohammad Bilal	MB	UK Power Networks	Alternate	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Nina Sharma	NS	Drax	Workgroup Member	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Pete Ashton	PA	Roadnight Taylor	Observer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Richard Woodward	RW	NGET	Alternate		<input checked="" type="checkbox"/>

Public

Ross O'Hare

RH

SSEN

Workgroup Member

