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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:	Zivanayi Musanhi	
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Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" 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 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
		<p>We believe that both solutions better facilitate ACO (a) by eliminating the need for an Evaluation for Transmission Impact Assessment for smaller projects. This will lead to quicker connections and enable concentrated efforts to assess larger projects that have significant impact on the transmission network.</p> <p>Both better facilitate ACO (b) as they enable generation schemes with no transmission impact to connect to the network quicker driving down costs for the end consumer whilst decarbonising the electricity system.</p> <p>Both better facilitate ACO (d) as they enable a more efficient connections process for smaller generation that is proportionate with their impact on the transmission network.</p>
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		We agree with CMP446 being implemented ahead of Connections Reform arrangements as it will enable sub 5MW generators to

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		connect without being subject to the Gate 2 To Whole Queue process whilst promoting an efficient process for updating the relevant Bilateral Connection Agreements. This will avoid duplication of effort due to the need to reassess the existing transmission connection works, saving cost and time compared to if this were to be implemented after Connections Reform.
3	Do you have any other comments?	Click or tap here to enter text.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>We do not believe the addition to Section 6.5.1(f) should reference Registered Capacity as defined in the Distribution Code. We believe that the use of this definition is disproportionate to the impact these projects will have on the transmission network.</p> <p>Furthermore, Registered Capacity as defined in the Distribution Code only considers the full load capacity of a single Power Generating Module which is not representative of net power flow output in MW of the Relevant Embedded Power Station/Power Generating Facility. This does not align with the power flows that will be observed on the network once the Embedded Power Station/Power Generating Facility has connected to the network.</p> <p>Please note the concept of Power Generating Module and Power Generating Facility was brought in as a result of the Requirements for Generation (RfG) EU network codes. This is concerned with the technical and operational requirements for Power Generating Modules.</p> <p>The change as proposed will impede embedded demand customers from decarbonising their operations, as a behind the meter addition of renewable generation would still require an Evaluation for Transmission Impact Assessment even if they do not intend to export power onto the distribution network. This will lead to significant costs and long lead times for such projects which counteracts the objectives of this modification proposal.</p> <p>It is our view that Registered Capacity definition (c) as defined in the Grid Code is more appropriate as it will align with the power flows observed on the network once the Power Station connects (Export</p>

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		<p>Capacity). Hence, it is proportionate to the thermal impact on the transmission network and will facilitate what we believe to be a more efficient network design process.</p> <p>Fault levels are dealt with separately in their entirety as part of the TIA taking into account the fault level contribution from all sources including embedded demand. In addition, fault level information is provided as part of the BAU information exchange that happens between DNOs, NESO and Transmission Owners such as technical planning meetings (e.g. Joint System Development Liaison) and the established planning data exchange processes (Week 24/50) as mandated by the Grid Code.</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?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>We do not believe it has any direct impacts on the Electricity Balancing Regulation (EBR) Article 18 as it does not seek to change any existing Balancing Services.</p>

Specific Workgroup Consultation questions

7	Do you believe that a codification of Scotland threshold is required for CMP446?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Whilst we understand the need for harmonisation across GB, we do not believe that the codification of Scotland TIA thresholds is in scope of the defect that this code modification proposal seeks to address.</p> <p>This code modification was granted urgency as the changes it is proposing interact with Connections Reform. However, we do not believe the codification of Scotland thresholds before implementation of Connections Reform is needed as it will not have any impact on the Gate 2 To Whole Queue (G2TWQ) assessment since there is no current proposal to change them.</p> <p>If there is a need to codify the threshold for Scotland, it can be done later as a separate code modification to avoid delaying the changes proposed in England and Wales.</p>
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8	Is it clear that the change in threshold is cumulative not incremental?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>We do not believe the definition of Registered Capacity as per the Distribution Code makes it clear that the change in threshold is cumulative rather than incremental as it only refers to a Power Generating Module rather than the Power Station. The current proposed definition is contradictory to the threshold being cumulative as it does not cover scenarios where a customer with multiple sub 5MW Power Generating Modules within their Power Station request for a ≥ 5 MW Export Capacity. On the other hand, based on the proposed Registered Capacity definition, a customer installing a sub 5MW Power Generating Module without requiring any export from the Power Station (0MW Export Capacity) to the distribution network would now need to go through the TIA process which does not align with the cumulative principle.</p> <p>We believe that use of Registered Capacity definition (c) of the Grid Code will facilitate the threshold being a cumulative value rather than incremental as it is aligned to the Power Station Export Capacity to the distribution network.</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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Based on NGET and NESO's analyses of different options for the increase in threshold, we agree with 5MW being the correct threshold for this modification as it strikes the appropriate balance between network impact and size of small-scale projects.</p> <p>NGET and NESO assessed the impact of increasing the threshold for up to 10MW, before they settled on the 5MW threshold, so any further increase to this threshold needs to be appropriately assessed before consideration by the workgroup.</p>
10	Are there any other generic scenarios (over and above those shown in Figure 2 and Figure 3 (Annex 7) that	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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	need to be considered by the Workgroup, please provide details of them and explain why they are relevant?	Click or tap here to enter text.
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 support the approach of not allowing new connections of any size in a GSP that is fault level constrained as all Network Operators have obligations not to do so under ESQCR as well as within their Bilateral Contractual Agreements at the GSP. However, we do not believe that these projects should require a separate application to NESO/NGET as that is inconsistent with the current approach for sub 1MW projects in fault level restricted GSPs.</p> <p>The total fault contributions from all sources (including the sub 5MW projects) will be included in the overall fault infeed from the DNO network in the DNO's next TIA application to NESO. The DNO will continue to ensure that these projects do not connect to the network until the fault level issues have been resolved at the GSP to avoid exacerbating the fault level constraint.</p> <p>In addition, fault level information is provided as part of the BAU information exchange processes that happens between DNOs, NESO and Transmission Owners such as technical planning meetings (e.g. Joint System Development Liaison) and the established planning data exchange processes (Week 24/50) as mandated by the Grid Code.</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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Click or tap here to enter text.</p>
13	Do you believe that as consequence of CMP446 there will be an increase in <5MW projects which is	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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	likely to have an impact on the Transmission Network? If so, what kind of projects could drive this?	We acknowledge that if CMP446 were to be approved, there will be an increase in connection applications of <5MW projects. However, the impact is more likely to be visible on the distribution network first as the distribution network assets have a much lower rating compared to transmission network assets. Furthermore, the transmission network is electrically remote relative to the points of connection of sub 5MW embedded projects resulting in minimal impact to the transmission network before it becomes an issue on the distribution network.
14	Do you have any suggestions for any additional mitigation measures for the identified risk?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.
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 We understand that Technical Limits in GSPs with unrestricted unconnected sub 5MW generation will be reduced as a consequence of these projects being removed from the Appendix G. However, we anticipate that the impact to existing curtailment levels will be marginal due to the small quantum of such generation currently on the Appendix G. Furthermore, the LIFO stacks used to estimate curtailment will be revised as a consequence of the Gate 2 To Whole Queue process which will lead to revised curtailment estimates regardless of CMP446 outcome. If a substantial amount of sub 5MW generation were to connect in the future, this would be reflected in the Technical Limits at the GSP. This is because the Alternative Methodology for calculating Technical Limits is based on ensuring the Limits are reflective of historic power flows across the GSP which would capture the net contribution of sub 5MW generation at the transmission/distribution boundary. We also are mindful to the fact that embedded demand growth can happen especially as the economy decarbonises which will help counteract any negative impact on curtailment levels.
16	Is the timeline of interactions understood?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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		Click or tap here to enter text.
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>We do not believe that this code modification should limit the distribution solution for a specific group of projects to certain voltage levels as this is inefficient. The Point of Connection for any project at the distribution network should continue to be the minimum cost solution based on the DNO's assessment as governed by the DNO's Connection Charging Methodology Statement that is imposed on it by the Authority as part of its Licence.</p> <p>Furthermore, this is discriminatory against existing embedded demand customers connected at higher voltage levels as it will impede them from decarbonising their operations if this were to be included in the code modification.</p>