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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 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 or cusc.team@nationalenergyiso.com

Respondent details	Please enter your details	
Respondent name:	Joe Colebrook	
Company name:	Innova Renewables	
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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 type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D
		Alternative Request 1 <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		<p>Objective (a): CMP446 improves efficiency by streamlining the connection process for embedded Generation (DG) under 5MW in England and Wales. By removing unnecessary Transmission Impact Assessments (TIA) for small projects, National Grid Electricity Transmission (NGET) and the National Energy System Operator (NESO) can focus on larger projects with a more significant impact on the transmission system. This aligns with Ofgem and the UK Government's Connections Action Plan, which seeks to accelerate connections and reduce delays in achieving Net Zero targets.</p> <p>Objective (b): By raising the TIA threshold from 1MW to 5MW, CMP446 removes unnecessary barriers for smaller renewable</p>

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		<p>energy projects, which often face delays and high costs due to transmission assessments. Faster and cheaper connections for smaller generators encourage higher market participation, particularly for community energy projects and high energy demand users who install behind-the-meter generation, who might otherwise struggle with long lead times. A more competitive and diverse energy market leads to lower costs for consumers and greater innovation in distributed energy solutions.</p> <p>Objective c): CMP446 does not have an impact on Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.</p> <p>Objective (d): The modification reduces administrative burden by removing the need for TIAs for smaller projects that have minimal impact on the transmission network. This simplifies the connection process, leading to faster approvals and reduced workload for NESO, Transmission Owners (TOs), Distribution Network Operators (DNOs) and customers. It also improves transparency and predictability, as embedded generation projects below 5MW will no longer face uncertainty related to transmission impact delays.</p> <p>Innova believes the alternative request, which uses export capacity instead of installed capacity, will also meet objectives a), b), and d) for the reasons outlined above.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Innova agree, that to the extent possible, CMP446 should be implemented before CMP435 and CMP434 to ensure the Grid Connections Reform process is as efficient as possible and networks and customers do not unnecessarily waste time and resources.</p>
3	Do you have any other comments?	<p>When evaluating this modification, the workgroup and the Authority should consider the benefits to energy-intensive users who want to install behind-the-meter generation to help reduce energy costs and reduce the need for energy reinforcement on the distribution network which is forecasting a large increase in demand. Using installed capacity will likely have limited benefits for these large-demand users as they will need to significantly overplant or even co-locate generation technologies (including energy storage) to provide sufficient reliable power.</p> <p>Innova believes alternative request 1 is better than the Original. Innova believes export capacity is more representative of the impact a project has on the grid. Due to the co-location of technologies and the need to over-plant renewables to ensure year-round production, 5MW of installed capacity will likely have minimal impact on the distribution network. Energy-intensive users will continue to have an</p>

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		<p>overly onerous administrative burden on them which will provide high barriers to behind-the-meter generation and delay the build-out of small-scale generation co-located with demand which reduces the cost of energy and reduces the physical electricity infrastructure required.</p> <p>Requiring behind-the-meter generation to go through a TIA may mean that it is unable to be connected because it is not strategically aligned with Clean Power 2030 pots and the 2035 pots defined in https://www.gov.uk/government/publications/clean-power-2030-action-plan. Behind-the-meter energy storage projects which want to install >5MW of inverters will effectively be banned going forward if the Original is implemented.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section)</p> <p><input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
5	Does the draft legal text satisfy the intent of the modification?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Innova does not believe the Legal Text provides sufficient clarity on the specific exception where a project <5MW will be considered a relevant embedded power station. The exception is when a GSP has a fault level headroom of <1kA.</p> <p>Has a legal expert confirmed that the CUSC can reference the Registered Capacity as defined in the distribution code even though the CUSC already has a definition for registered capacity?</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>No further comment.</p>

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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 <p>Innova believes the codification of TIA thresholds for Scotland would bring much-needed legal certainty to the TIA process, which improves investor confidence. But Innova agree that the codification can be progressed as part of a separate code modification and therefore allow the swift implementation of CMP446 to fix a known defect.</p>
8	Is it clear that the change in threshold is cumulative not incremental?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>The workgroup has provided sufficient scenarios and examples to make it clear how the new TIA threshold would be applied.</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>From the perspective of project development, Innova would support an increase of the TIA threshold to 10MW, as we believe this is the likely maximum capacity of the type of projects this modification will benefit most i.e. community energy projects, commercial rooftop solar, other behind the meter generation for energy-intensive users. However, Innova appreciates that network owners must be confident that the impact on their network is manageable and does not have a significant detrimental impact on other connecting parties.</p> <p>Any project that is required to go through a TIA will be required to align with the Clean Power 2030 action plan and the connection caps set by NESO as outlined in the Connections Network Design Methodology (CNDM).</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?	No further comment.
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 type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Innova agrees with the safety of the network and people who work on or use the network are of the utmost importance.</p> <p>Innova believes the proposal to include all projects between 1MW – 5MW in a TIA at GSPs with <1kA fault level creates an ambiguous and inefficient process. This creates significant room for human error that could create years of delay for projects where it is not included in a TIA when it should have been included, noting CMP434 will mean it could take up to 12 months to go through the TIA process. Within the workgroup discussion, NGET noted that ideally no generation projects should be connected at a GSP with 0kA headroom even if they are <1MW. Innova would prefer that there are no exceptions to the <5MW threshold and instead a different mechanism is used to be a moratorium on connections at specific GSPs with <1kA headroom.</p> <p>The workgroup should consider the impact of requiring a project to go through a TIA, as any project going through a TIA, even though it is <5MW will be required to strategically align with the Clean Power 2030 Action Plan and the regional and national connection capacity pots as outlined in the CNDM.</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>No further comment.</p>
13	Do you believe that as consequence of CMP446 there will be an increase in <5MW projects which is	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

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	likely to have an impact on the Transmission Network? If so, what kind of projects could drive this?	<p>Innova believes there will be an increase in applications for <5MW connections once CMP446 is implemented which would be evidence that the change was needed and was successful at reducing the administrative burden and reducing barriers for small-scale distributed generation.</p> <p>Innova believe there is no market for commercial scale, stand-alone power stations <5MW, as they are not economically viable, and in any case, will be significantly less cost-effective than >5MW stand-alone power stations. Therefore, the increase in <5MW connections will be due to an increase in community energy projects, commercial rooftop solar, and behind-the-meter generation co-located with high energy demand customers.</p> <p>Innova believes there will be an increase in projects that modify existing connection offers and reduce the capacity to <5MW, but this will be acceptable because a reduction in capacity across many projects will actually reduce the impact of distributed generation on the transmission network as total capacity will have been reduced.</p>
14	Do you have any suggestions for any additional mitigation measures for the identified risk?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>No further comment.</p>
15	Do you understand that as a consequence of CMP446 the curtailment assumptions for an accepted Technical Limits offer could be impacted?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Yes, the explanation in the workgroup report is clear.</p>

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16	Is the timeline of interactions understood?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Yes, the diagram is clear.
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
		Innova does not believe wording should be added to the legal text that specifies what voltage projects should connect at (e.g. 11kV etc.) to be captured by the change in threshold.