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Code Administrator Consultation Response Proforma

CMP446: Increasing the lower threshold in England and Wales for Evaluation of Transmission Impact Assessment

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 **17 March 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@uk.nationalenergyiso.com or cusc.team@nationalenergyiso.com

Respondent details	Please enter your details	
Respondent name:	Ross O'Hare	
Company name:	SSEN Distribution	
Email address:	ross.ohare@sse.com	
Phone number:	07586288594	
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 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 Code Administrator Consultation questions			
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	Mark the Objectives which you believe the proposed solution(s) better facilitates:	
		Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		WACM1	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		WACM2	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
		WACM3	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		WACM4	<input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		WACM5	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D

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	<p>SSEN Distribution feel the original solution better facilitates ACO (a), (b) and (d) as the change in TIA threshold offers a more efficient and effective solution. This will lead to smaller projects connecting quicker, with Transmission resource being able to focus more on larger projects, meeting ACO (a) and (d) on efficiency. By increasing the threshold, this will allow a wider range of projects to connect quicker without paying a fee or waiting for TIA works, including community generated projects, which meets ACO (b) of effective competition.</p> <p>WACM 1 is our preferred solution as the definition of 'export capacity' is better suited to the TIA threshold increase than the original. Therefore, this better facilitates ACO (a), (b) and (d) and is more appropriate than the original using this definition. We support this WACM for the same reasons as the original against these objectives.</p> <p>We support WACM 2 against ACO (a), (b) and (d) as having transparency at each GSP on the TIA threshold offers clear guidance for customers. This could prove effective in clearly demonstrating to customers, in particular where fault level headroom affects a GSP as the increased threshold will not apply there, which creates a more efficient and effective solution.</p> <p>Overall, we do not support WACM 3 as feel against ACO (b), this does not offer effective competition. A limit at each GSP of 25MW may be filled by those projects already in the queue and limit any new customers from taking advantage of this proposal. CMP446 was raised to help connect more smaller projects but this WACM will hinder the acceleration of connecting more projects. Against ACO (d), WACM 3 does not promote efficiency in the TIA threshold as this could create more complexity in implementation. Additionally, with this code being raised urgently there has not been enough analysis on why 25MW is the most viable capacity at each GSP. This could alter across GSPs depending on network size and framework and so we are not in full support of this WACM. However, we believe the volume of connections under 5MW should be</p>
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		<p>monitored closely after CMP446 is implemented to understand if there are any significant impacts on the Transmission network of this modification.</p> <p>Similarly to WACM 3, we are not in support overall of WACM 4 against ACO (b) and (d).</p> <p>Similarly to WACM 2, we are in support for WACM 5 and feel it better facilitates ACO (a), (b) and (d).</p>
2	Do you have a preferred proposed solution?	<p><input type="checkbox"/> Original</p> <p><input checked="" type="checkbox"/> WACM1</p> <p><input type="checkbox"/> WACM2</p> <p><input type="checkbox"/> WACM3</p> <p><input type="checkbox"/> WACM4</p> <p><input type="checkbox"/> WACM5</p> <p><input type="checkbox"/> Baseline</p> <p><input type="checkbox"/> No preference</p> <p>We are in support of the original proposed solution but feel export capacity offers a better definition than registered capacity and so our preference is for WACM 1.</p> <p>We are also supportive of WACM 2 and WACM 5.</p>
3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>SSEN Distribution support the proposed implementation approach. We are supportive of improving the process for smaller Distributed Generation in connecting to the network quicker without going through an Evaluation of Transmission Impact Assessment, while believing it will have minimal impact on the Transmission System.</p>

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		<p>This will allow Transmission Operators to focus on Transmission Impacts for larger projects, improving the efficiency and ensuring resource is utilised most effectively. Smaller projects under 5MW will no longer have to stagnate waiting for these assessments to occur and no longer have the burden of paying for these assessments, which could be difficult for smaller connections and community projects.</p> <p>With the limit of 1MW being in place since 2016 and Connections Reform coming into place in 2025, this is the ideal time to increase the lower threshold to allow for more projects to be connected and help meet the targets set out by the Connections Action Plan. This change supports the UK Governments plans to decarbonise and meet Net Zero.</p>
4	Do you have any other comments?	<p>We have a slight concern that ‘the raising of the TIA threshold’ has been mentioned a lot in industry, but that the Original is proposing to use a different unit of measurement than the current industry standard. This has negative implications on many customers and will introduce confusion into a well-established process. We therefore are in full support of WACM 1 as believe this definition of measurement is more accurate.</p>
5	Do you agree with the Workgroup’s assessment that the modification does not impact the 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 agree that the modification does not impact the EBE Article 18 terms and conditions held within the code.</p>