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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@nationalenergygo.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@nationalenergygo.com or cusc.team@nationalenergygo.com

Respondent details	Please enter your details	
Respondent name:	Kara Davies	
Company name:	Solar Energy UK	
Email address:	kdavies@solarenergyuk.org	
Phone number:	Click or tap here to enter text.	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input checked="" 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 type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		Alternative Request 1 <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		We agree with the original proposal
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes
		<input type="checkbox"/> No
		Yes, we agree that this should be done ahead of introducing Gate 2 and other connection reform policies.

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3	Do you have any other comments?	<p>Solar Energy UK strongly supports increasing the TIA threshold to 5MW. Given that the Clean Power 2030 plans primarily focus on connecting solar at the distribution level, raising the threshold will enable solar to reach its full potential and make a substantial contribution to climate targets. Maximising the deployment of solar that falls outside the Clean Power 2030 technology caps will be highly beneficial.</p> <p>Regarding whether 'Registered Capacity' or 'Export Capacity' should be used as the basis for this proposal, we believe Export Capacity is the more appropriate measure. It is more closely aligned with Transmission Entry Capacity (TEC) at the transmission level and better reflects the generator's maximum export to the distribution network, accounting for any actions taken by ANM or other control devices.</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>We believe the amendments to CUSC Schedule 2 Exhibit 1A adequately fulfil the intent of the modification. However, we consider it important that the CUSC Section 6 legal text also explicitly confirms the equivalent value for Scotland. As it is currently drafted, the legal text remains incomplete.</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>Click or tap here to enter text.</p>

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Specific Workgroup Consultation questions		
7	Do you believe that a codification of Scotland threshold is required for CMP446?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>We believe the threshold for Scotland should be explicitly defined in the CUSC legal text to provide clarity on its value and differentiation from the threshold in England and Wales.</p> <p>Without this clarification, there is a risk that NESO, DNOs, and developers may apply inconsistent values to projects in Scotland. While we acknowledge that determining the appropriate threshold for Scotland is beyond the scope of this consultation, we must highlight serious concerns regarding the disparity between TIA thresholds in Scotland compared to England and Wales.</p> <p>If Scotland's TIA thresholds are not similarly increased, there is a significant risk of further unbalancing an already uneven playing field, potentially deterring investment in Scottish renewables – particularly in onsite projects designed to reduce energy costs for householders and businesses. This continued imbalance of TIA thresholds would not only undermine Scotland's solar energy industry but also jeopardise its own climate and energy ambitions, including the target of 4-6GW solar deployment by 2030. Moreover, it could hinder the UK's broader Clean Power and Net Zero targets, as achieving these will require substantial renewable generation at both the Distribution and Transmission levels in Scotland.</p>
8	Is it clear that the change in threshold is cumulative not incremental?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>We believe this is clear in the consultation however this clarity is not translated to the legal text.</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>While we trust that the 5MW increased threshold will be sufficient – as a minimum - in most cases, NESO should consider a more localised approach, allowing for higher thresholds in areas with adequate capacity, rather than applying a one-size-fits-all policy.</p>

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10	Are there any other generic scenarios (over and above those shown in Figure 2 and Figure 3 (Annex 7) that need to be considered by the Workgroup, please provide details of them and explain why they are relevant?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		While largely addressed in Figures 2 and 3, for completeness, it may be beneficial to include a scenario where a project increases installed capacity without increasing export capacity. Additionally, it is important to note that this capacity is technology-agnostic, meaning there is no distinction between expanding an existing technology or incorporating a new one into the project.
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
		We agree with this approach from a safety standpoint, but we have concerns regarding the transparency of how the affected GSPs are shared in the proposal. We believe that GSPs with differing TIA thresholds should be published and reviewed regularly, with a corresponding CUSC obligation to ensure this is consistently upheld.
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 type="checkbox"/> Yes <input type="checkbox"/> No
		No comment.
13	Do you believe that as consequence of CMP446 there will be an increase in <5MW projects which is likely to have an impact on the Transmission Network? If so, what kind of projects could drive this?	<input type="checkbox"/> Yes <input type="checkbox"/> No
		No comment.
14	Do you have any suggestions for any additional mitigation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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	measures for the identified risk?	
		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, following CMP446, the curtailment assumptions provided by DNOs will need to be updated, likely resulting in an increase in curtailment for projects over 5MW when managing GSP issues. We would appreciate more information from the DNOs on how they plan to implement this.
16	Is the timeline of interactions understood?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Yes, and the relationship between CMP446 and connections reform is understood.
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 type="checkbox"/> No
		No comment.