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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](mailto: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](mailto:milly.lewis@nationalenergyso.com) or [cusc.team@nationalenergyso.com](mailto:cusc.team@nationalenergyso.com)

Respondent details	Please enter your details	
Respondent name:	Ross O'Hare	
Company name:	SSEN Distribution	
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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 type="checkbox"/> D
		We support both options, with our preference being Alternative Request 1 as it more closely aligns with current industry practice and provides greater overall benefit to customers.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		SSEN Distribution support the proposed implementation approach. We are supportive of improving the process for smaller Distributed Generation in connecting to the

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		<p>network quicker without going through an Evaluation of Transmission Impact Assessment, while having minimal impact on the Transmission System.</p> <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>
3	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 Alternative Request 1 as believe this definition of measurement is more accurate.</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 <a href="#">Workgroup Consultation</a> Section)</p> <p><input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
5		<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

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	Does the draft legal text satisfy the intent of the modification?	Yes, the draft legal text satisfies the intent of this modification.
	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?	Yes, we agree that the modification does not impact the EBR Article 18 terms and conditions held within the code.

### 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>SSEN Distribution, working with our colleagues from SSEN Transmission, believe it to be detrimental to codify the Scotland threshold limits for the time being. In the Scottish mainland, we have recently increased the threshold in which a Transmission Impact Assessment is required to 200kW, which is under review to understand the impact of this recent change. Not codifying the threshold in Scotland in this modification will give us time to fully understand the implication this change has had on our network and if this is a suitable threshold to hold for the Scottish mainland. This could be subject to change, based on our review and so we believe not codifying Scotland will enable us to understand the findings and have the flexibility to review these limits as and when we have enough data to understand these implications.</p> <p>We are glad of the progress we have made in increasing the lower threshold on the Scottish mainland, but we still have customers in the Scottish islands at a lower threshold of 50kW who are hoping this value is increased. Not codifying the threshold limits in Scotland will potentially allow for the Scottish islands to see an increase in their lower threshold more easily and fall closer in line to the rest of Scotland.</p> <p>The CMP446 code modification was raised with focus on England and Wales. If limits in Scotland are to be codified in the future, this should be done after a complete review has been finalised on which lower threshold is suitable to have for Scotland, with a future modification to be raised for this.</p>
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8	Is it clear that the change in threshold is cumulative not incremental?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  It is clear the change in threshold is cumulative and not incremental, following from the current threshold being cumulative. We are supportive of this, as we appreciate that an incremental capacity threshold would have a significant impact on the transmission infrastructure.
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  We believe the increase in threshold to 5MW offers a suitable increase which will allow for more projects to connect without requiring an Evaluation of a Transmission Impact Assessment, without having a significant impact on the Transmission system.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No  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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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	<p>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>	<p>We agree with the proposal to run the &gt;1MW DGs through TIA for sites where the fault level headroom is &lt;1kA or 0kA. From an engineering perspective, we still have the responsibility to maintain network safety and security. There might be a question of fairness and discrimination to customers regarding this change which could affect about 4 GSPs in the SSEN license area.</p>
12	<p>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>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>SSEN Distribution agree with the risks identified in the consultation.</p> <p>A risk that is not mentioned in these scenarios is highlighting the difference in threshold from Scotland to England &amp; Wales. This may attract developers to England &amp; Wales as they can connect up to 5MW with no evaluation on Transmission Impact Assessment, compared to 200kW on the mainland of Scotland and 50kW on the Scottish islands. This will mean a similar sized project can be connected a lot quicker depending on the location of this GSP. This may prove less attractive to build a project of less than 5MW in Scotland due to the time this will take to get a connection date after Transmission works are complete. There could be projects that are geographically close on the Scottish borders to England but are subject to a significant difference on connection date if they require a TIA based on which side of the border they fall at, which may prove a risk in connecting these customers in Scotland.</p>
13	<p>Do you believe that as consequence of CMP446 there will be an increase in &lt;5MW projects which is likely to have an impact on the Transmission Network? If so, what kind of projects could drive this?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>We believe that more projects will want to connect under the 5MW threshold to avoid Transmission Impact Assessment as this will allow for a much faster connection process than waiting for the transmission works to be completed.</p> <p>Projects sitting just above the 5MW capacity could drive this influx due to cost and time savings it could pose to connect under this threshold limit. Technologies that may be over subscribed due to the Clean Power 2030 Action Plan may utilise this increase in threshold as a means of guaranteeing a connection which could also drive these types of projects.</p> <p>It must be made clear where a project is currently in the queue with a capacity above 5MW and wishes to change their capacity to under 5MW after this code modification is implemented, if they are able to do this without going through a TIA due to CMP446 or if they are legally contracted to carrying this out. The securities and charges for this must be made clear as</p>

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		a lot of projects could look at decreasing their capacity to connect under 5MW, which in turn may cause a large impact on the Transmission Network.
14	Do you have any suggestions for any additional mitigation measures for the identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <p>By not codifying Scotland, this will allow Scottish Transmission Operators to carry out their reviews on the current threshold limits in Scotland to understand if the current limits of 200kW are suitable. If Scotland could benefit from increasing this further and bridging the gap between Scotland and England &amp; Wales, not codifying this limit will allow for that to happen with more pace and ease. This in turn will allow more customers to connect in a timely manner and help in our main mission of decarbonising the network.</p>
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  <p>It is understood that due to CMP446, the curtailment on Technical Limits offers may be impacted on. There are around 150 GSPs with Technical Limits now in operation, and so the 852MW that this modification will release would cause minimal impact if the capacity was spread across the 150 GSPs.</p>
16	Is the timeline of interaction understood?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <p>The timeline of interactions are understood, with SSEN Distribution in favour of CMP446 being approved and implemented before the Gate 2 window opens.</p> <p>This code modification was raised with urgency to be implemented and approved before the Gate 2 window opens as this will allow for projects under 5MW to avoid the evaluation of a Transmission Impact Assessment. The three scenarios provided in the workgroup consultation detail CMP446 and CMP435 being approved first before the Gate 2 window opens.</p> <p>The different scenarios show CMP446 being approved first as well as CMP435 being approved first, with an overlap of these also detailed as a scenario. With NESO being able to use the mechanics of CMP435 to retrospectively remove projects that are between 1MW and 5MW, there is no great difference to these timelines, so long as these are both approved before the Gate 2 window opens. Any of these timelines will allow for</p>

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		connections under 5MW to connect sooner as they will avoid a Transmission Impact Assessment.
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  SSEN Distribution are in favour of carrying out reviews on a case-by-case basis to determine their voltage level. Therefore, we do not feel this is appropriate for this code modification. Having further restrictions on the legal text may prove detrimental to other projects connecting at a different voltage level.