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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@nationalenergyso.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.nationalenergyso.com or cusc.team@nationalenergyso.com

Respondent details	Please enter your details	
Respondent name:	Mark Lawrence	
Company name:	Conrad Energy	
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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 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 type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input 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 type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input 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 type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D

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		No comment on C
2	Do you have a preferred proposed solution?	<input type="checkbox"/> Original <input checked="" type="checkbox"/> WACM1 <input type="checkbox"/> WACM2 <input type="checkbox"/> WACM3 <input type="checkbox"/> WACM4 <input type="checkbox"/> WACM5 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		<p>We strongly support using export capacity instead of installed capacity for measuring the 5MW threshold (in England) as in practice the upstream transmission network will only see export.</p> <p>We believe other WACM's to introduce caps or GSP specific limits would unnecessarily overcomplicate the assessment and implementation process and be prohibitive in encouraging and deploying projects such as behind the meter solar.</p>
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>We strongly support quick implementation of the proposals on 02 May 2025 to align with implementing the wider reforms.</p> <p>The increased threshold should also help to reduce workload in implementing the reforms and establishing the new Gate 2 queue (by removing the need to assess smaller projects).</p>
4	Do you have any other comments?	We believe existing connections with already secured export capacity above the TIA threshold

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		<p>and where there is no requirement to increase the existing secured export, should be allowed to add a technology type to the existing connection without needing a full TIA assessment</p> <p>e.g. an existing site with 10MW of secured export capacity for synchronous (non-intermittent) generation should be allowed to add 10MW of (intermittent) solar generation capacity in order to maximise the use of the connection. Under this scenario the site's maximum export capacity would remain at 10MW with appropriate export limiting installed and suitable interlocking to ensure the existing synchronous generation and new solar generation cannot be connected in parallel with the distribution network at the same time (which would ensure the site's existing fault level contribution is not exceeded).</p> <p>In this scenario we would expect the existing non-intermittent generation is modelled such that it could export the full 10MW 24-hours a day. Therefore adding intermittent generation to this export profile should not have any detrimental impact on other customers and could simply be recorded as a technology change/addition. The addition of solar generation at the existing site could potentially count towards CP30 targets.</p> <p>Generally in respect of fault levels - 1kA headroom at 275kV or 400kV still seems significant headroom when considering 5MW lower voltage connections to the DNO network, which would be expected to have negligible fault level impact on the transmission network.</p>
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		If possible a 500A or less headroom to trigger a TIA at GSP's with fault level constraints would seem more appropriate.
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?	<input type="checkbox"/> Yes <input type="checkbox"/> No No comment