

Workgroup Consultation Response Proforma**CMP298: Updating the Statement of Works process to facilitate aggregated assessment of relevant and collectively relevant embedded generation**

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@nationalgrideso.com by **5pm on 10 September 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation, please contact Paul Mullen paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Grahame Neale
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I wish my response to be:

(Please mark the relevant box)

 Non-Confidential Confidential

Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel, the Workgroup or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

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 the Transmission 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.*

**Objective (c) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).*

Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the CMP298 Original Proposal better facilitates the Applicable Objectives?	Yes, we agree that the CMP298 Original solution better facilitates the CUSC applicable objectives, specifically objectives A, B and D.
2	Do you support the proposed implementation approach?	We support the implementation approach. Whilst we would like to see a shorter transition period and would do deliver this as soon as possible, we believe it is a pragmatic length of time given the volume of contracts that need to be updated with the input of DNOs, NGENSO and TOs.
3	Do you have any other comments?	We would note that Ofgem's minded-to decision on Access & Forward-Looking Charges SCR has suggested NGENSO should contract directly with all parties =>1MW. Should Ofgem ultimately decide this is the answer to the SCR, significant changes to the connections process (including what is proposed by this CMP298 proposal) may be required to accommodate the SCR decision.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Not at this stage
Modification Specific Workgroup Consultation questions		
5	Do you believe it is appropriate for the ESO to approve/reject the changes to Appendix G proposed by the Distribution Network Operators or is it sufficient that such changes are deemed to be accepted with a disputes process by exception? Please provide the rationale for your response.	<p>Yes, we believe this is appropriate for the following reasons;</p> <ol style="list-style-type: none"> 1. This is the structure currently in use as part of the trials of 'Appendix G' as such it is a 'tried and tested' approach to managing changes to Appendix G. 2. A defined approval window for NGENSO to approve/reject changes to Appendix G gives certainty to DNOs of when a decision will be received and so allows them to provide full/complete offers to distribution connected generators/storage. 3. Provides reassurance to DNOs as NGENSO actively 'approve' changes to Appendix G and so any errors not picked up under the approval would be NGENSO's risk to manage

6	<p>Do you believe it is appropriate for the ESO to charge the Distribution Network Operators an application fee and/or a validation fee for their data to ensure the requirements of the Transmission Impact Assessment are met?</p>	<p>Yes, we believe it is appropriate to charge a DNO in instances where the requirements of the TIA are not met, this is because;</p> <ol style="list-style-type: none"> 1. Experience from the trials has highlighted that data held by DNOs is of variable quality and a significant amount of NGENSO time is needed each month to rectify defects 2. Without a charge directly relating to the quality of data, DNOs have no incentive to improve the quality of this data. 3. The charge directly relates to the area it is addressing and is completely avoidable 4. Without this charge, this additional cost (associated with the additional resource needed to manage these issues) would be smeared across all other applications made to the transmission system. We therefore believe it is most appropriate to recover this cost from those parties who are responsible, rather than other industry participants.
7	<p>The CMP298 Workgroup have proposed that the ESO should publish a central list of which GSPs are on Statement of Works/ Confirmation of Project Progression and which are on Transmission Impact Assessment. They have also suggested what should be included and set a minimum timescale. Do you agree that this data should be centralised and hosted by the ESO and if so, do you have any comments on the proposed content and timing? Please provide the rationale for your response.</p>	<p>We agree with the proposal for the ESO to centrally host data on when an Evaluation of Transmission Impact (ETI) would be required on a GSP basis. This is because it will provide industry with information of when an ETI would be required as well as indicative information of where in Great Britain is easy/difficult to connect without impacting the Transmission system.</p>
8	<p>Will the CMP298 Original Proposal impact on your business. If so, how?</p>	<p>Yes, currently we have trials of 'Appendix G' in place with most DNOs and while most of these trials are similar in nature, they are applied differently. With the potential approval of CMP298, we would need to revise these trials</p>

		so that they are harmonised and transitioned in to BAU processes; which includes working with the Transmission Owners to develop STC processes.
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