

**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](mailto: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](mailto:paul.j.mullen@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com).

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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
2	Do you support the proposed implementation approach?	<p>We recognise that there is a lot of work to do to move the volume of GSPs involved onto the new TIA templates. We agree that a 24-month period is a reasonable timeframe for completion of the work across all DNOs. As a DNO we are concerned that the rate of progress is largely outside our control and we could end up not compliant with CUSC if the new templates are not in place by the end of the transition period. We believe that some timescales need to be agreed to ensure adequate progress to ensure compliance with the new processes. We suggest that this takes the form of target dates for the DNO to provide the data required for each GSP eg within six months for all GSPs. Once the information is submitted then the ESO would have a target timescale to respond eg 90 days as per current arrangements. GSPs where there is more than one DNO involved will need agreed timescales to allow the assessment to be undertaken.</p>
3	Do you have any other comments?	<p>We welcome the change to the criteria of what size of connection is covered by these processes.</p> <p>We are unclear as to what information is going to be provided in terms of Materiality Triggers and Planning Limits. There needs to be clarity on how the different aspects are going to be communicated. The Planning Limit is described as the capability of the network, but it is unclear if this is net of of any transmission connected generation. Visibility is needed of what the network can accept and then how this is being utilised by connected and contracted customers at both transmission and distribution to ultimately establish the remaining capacity available. The Planning Limit is not defined within the BCA Appendix G Schedule 1 and therefore the means of communication from the ESO is unclear. We believe further clarity is required on how the Planning Limit will be derived and communicated within the CUSC suite of documents.</p>

		Clarity on how new capacity that will become available at some point in the future when identified works have been completed will be included in the Planning Limit needs further clarity. This should be visible to customers and available for allocation in advance of the work being completed.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Yes
<b>Modification Specific Workgroup Consultation questions</b>		
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>The consultation describes the Appendix G process to allow DNOs to make connection offers setting out the transmission impact within the DNO's licence timescales which can then be accepted by the customer without further reference to the ESO. Having a process that includes an ESO approve/reject stage undermines this intent as it creates a commercial uncertainty and conflicts with the stated intention that the acceptance can be without further reference to the ESO.</p> <p>We believe for the process to work in line with the described intention, then the changes proposed by the DNO should be deemed to have been accepted. We accept that this is conditional on the process having been followed and the criteria met, for example, the DNO cannot exceed the Planning Limit threshold.</p> <p>The current drafting is also completely one sided, it does not have any reciprocation if the ESO makes an error. It also can be applied arbitrarily in any situation. Such draconian powers should not be available for any perceived error, for example a minor mistake that is below the materiality limit can result in all the capacity being removed from the DNOs use. This would compromise all other offers that the DNO has made in good faith even if the effect is immaterial.</p>
6	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	<p>No, we do not believe it is appropriate for the ESO to charge either an application fee or a validation fee. There are costs in this process for both DNOs and the ESO and we believe that these should be absorbed as BAU costs. These processes have been running as trials for several years and we would expect that the costs for the ESO to have been included in its ET2 settlement.</p>

	Transmission Impact Assessment are met?	
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 that such a central register would provide useful transparency for all stakeholders. It is not clear what the proposed information is intended to be. Is it intended to be the connected? Or to include the contracted as well? The key insight most stakeholder want is to understand the <i>available</i> capacity; it is not clear if that information will be made available. The timescales of a monthly refresh seem reasonable. However, we are unclear why the desired information on the available capacity cannot be provided. It is described as a “live” dataset but we would have thought stakeholders would accept that this is updated monthly and not “live”.</p>
8	<p>Will the CMP298 Original Proposal impact on your business. If so, how?</p>	<p>Yes. All our GSPs are on a form of Appendix G but will need to transfer to the new regime. This is likely to require us to provide a lot of data to the ESO for this transition.</p>