

**Workgroup Consultation Response Proforma****CMP328: Connections Triggering Distribution 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@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com) by **5pm** on 12 March 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 Rob Pears [Rob.Pears@nationalgrideso.com](mailto:Rob.Pears@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com)

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**For reference the Applicable CUSC (non-charging) Objectives are:**

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- 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;*
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*; and*
- 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.**

<b>Standard Workgroup Consultation questions</b>		
1	Do you believe that the CMP328 Original Proposal better facilitates the Applicable Objectives?	Objective A – Positively Objective B – Positively Objective C – Neutral Objective D – Neutral
2	Do you support the proposed implementation approach?	Yes – 12 months seems reasonable for implementation after approval.
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
<b>Modification Specific Workgroup Consultation questions</b>		
5	For DNO respondents, please describe your process and timescales associated with current Third Party Works applications	N/A
6	For Third Party Works users, please describe your experience of using the Third Party Works process, specifically awareness of and timescales associated with the process; are there any defects in the TPW process that the DIA process does not address?	Do not recall contracting TPWs, DIA fills the gaps.
7	Annex 6 provides a summary of the WG's view of the pros/cons of both the Third Party Works and proposed Distribution Impact Assessment process.	
7a	Do you agree with this?	Yes
7b	Do you have any additional pros or cons you wish to add?	No
8	Applicability - Do you agree with the applicability criteria proposed? Please provide your rationale.	Yes – This avoids ambiguity

9	Contractual milestones - Do you foresee a better way of updating contractual milestones to reflect the result of a Distribution Impact Assessment?	Yes, we agree appendix J should be the way to go to update contractual milestones
10	Fees and Costs - Do you agree with the Proposal that any costs as a result of the DIA should be passed from the DNO to the Transmission applicant via the ESO?	No – TO should pick up the cost.
11	Clean Energy Package (CEP) - Currently CUSC Section 4 documents the payments that will be made by the ESO for Mandatory Services with the site-specific details captured in the Bilateral Connection Agreement. In your view, how/where should any compensational arrangements be documented for DNOs curtailing Transmission connected generators.	Yes – This should be captured in the bilateral connection agreement with the SO. Potentially appendix F.
12	Which of the following do you believe should be included when assessing options/impacts under the proposed DIA process;	<p><b><u>Additional Comments:</u></b></p> <ul style="list-style-type: none"> <li>• Con of TPW – limited visibility to DNO of wider transmission network conditions until and unless TPW is required</li> <li>• Pro of DIA – better visibility to DNO of conditions on the wider T network, allowing a picture to be built over time which will inform discussions with their customers and future PP/SOWs</li> <li>• Con of DIA – doesn't go far enough to address current issues with inconsistent publication of projects that have secured TEC. Will require full transparency and ideally publication to function optimally, which would also improve efficiency of assessment of all connection types by DNOs/customers.</li> </ul>
12a	impact upon distribution connected generators/storage with transmission export capacity (TEC)	Yes

12b	impact upon distribution connected generators/storage without transmission export capacity (TEC)	No – These are not fully contracted and do not trigger reinforcement within SPEN. High MW figure could indicate future demand and allow normal condition based asset replacement to be “future-proofed” with extra capacity. There is no consistent milestone/portfolio management between DNOs. The D/“No TEC” figure is not helpful and subject to change.
13	Should the DIA process be triggered upon receipt, or acceptance of an application from the transmission customer and please provide your reasoning.	The DIA process should be triggered when necessary to ensure there is no delay in getting offers back.