Workgroup Consultation Response Proforma

**CMP330: Allowing new Transmission Connected Parties to build Connection Assets greater than 2km in length & CMP374: 'Extending contestability for Transmission Connections.**

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 **17 January 2022**. 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 Ren Walker Lurrentia.Walker@nationalgrideso.com or cusc.team@nationalgrideso.com

|  |  |
| --- | --- |
| **Respondent details** | **Please enter your details** |
| **Respondent name:** | Click or tap here to enter text. |
| **Company name:** | Click or tap here to enter text. |
| **Email address:** | Click or tap here to enter text. |
| **Phone number:** | Click or tap here to enter text. |

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

1. *That compliance with the use of system charging methodology facilitates effective competition in the generation and supply of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity;*
2. *That compliance with the use of system charging methodology results in charges which reflect, as far as is reasonably practicable, the costs (excluding any payments between transmission licensees which are made under and accordance with the STC) incurred by transmission licensees in their transmission businesses and which are compatible with standard licence condition C26 requirements of a connect and manage connection);*
3. *That, so far as is consistent with sub-paragraphs (a) and (b), the use of system charging methodology, as far as is reasonably practicable, properly takes account of the developments in transmission licensees’ transmission businesses;*
4. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency; and*
5. *Promoting efficiency in the implementation and administration of the system charging methodology.*

*\*Objective (d) 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 CMP330/CMP374 Original Proposal better facilitates the Applicable Objectives? | Click or tap here to enter text. |
| 2 | Do you support the proposed implementation approach? | Click or tap here to enter text. |
| 3 | Do you have any other comments? | Click or tap here to enter text. |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?  | Click or tap here to enter text. |
| **Modification Specific Workgroup Consultation questions** |
| 5 | Do you agree with the proposed solution that one offer with two options (contestable/non-contestable) would represent the best approach?  |  |
| 6 | Should there be a process to allow subsequent applicants to take over the contestable build already negotiated with the TO? If so, should this process have a ‘point of no return’ where this option is restricted?  |  |
| 7 | Are the proposed intervention criteria sufficient? Are there any additional criteria that should be considered? Please provide your views.  | Click or tap here to enter text. |
| 8 | Do you agree that no additional safeguards are required for the delivery of non-shared Infrastructure Assets via contestable works? If not, what protections would you wish to see?  | Click or tap here to enter text. |
| 9 | Do you agree with the principles of what needs to be included in the Adoption agreement as set out in Annex 4. | Click or tap here to enter text. |
| 10 | A potential alternative solution is that the contestability could be limited to just 132kV in Scotland, which in the Proposer's view is in line with treatment of 132kV in England and Wales. Do you think this is appropriate? Please provide justification for your views. |  |
| 11 | Are there any issues for stakeholders to extend contestability to building assets above 132kV. |  |
| 12 | Will the CMP330/374 Original Proposal / possible alternatives impact your business. If so, how?  |  |
| 13 | Do you think this change will benefit your organisation, other organisations, or end consumers? Please provide evidence and/or examples to support this.  |  |
| 14 | Do you believe this proposal brings forward any additional risks of the Onshore TO’s, other than those already identified?  Do you think a license change is required to mitigate the risks fully?   |  |