

**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).

Respondent details	Please enter your details
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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:**

- 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 CMP298 Original Proposal better facilitates the Applicable Objectives?	Yes
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	<p>We want an outcome which gives DNOs clarity over the process, timing, and capacities available so that then can provide timely and accurate information to the DG projects connecting to their networks.</p> <p>We want to note that the scope of CMP298 does not cover all the areas where DG stakeholders have experienced problems with clarity around the Statement of Works and Article G process – for example securities and cancelation charges.</p>
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	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.	Neutral. We agree with the Workgroup Member comment that this undermines the intent of CMP298. However, it could be appropriate if an ESO approval/rejection check in the end leads to a more certain outcome for DG projects seeking connections. We want an outcome where the DNO can make offers to DG that are fast and accurate. A disputes process could greater uncertainty and delay, which users do not want.
6	Do you believe it is appropriate for the ESO to charge the	Neutral. We agree that DNOs should be providing accurate data, however, are not sure if a fee sets the right

	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?	precedent as we transition to an increasing Whole Systems approach.
7	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>It would make sense to have the data centralised.</p> <p>Key data for use is:</p> <ul style="list-style-type: none"> <li>a) Up to date information on the time that it will take to carry out the works and therefore allow projects to connect.</li> <li>b) Information on how close currently un-impacted GSPs are to the Materiality Trigger and Planning limit (noting the ESO's commentary to this point at the top of page 18 of the consultation.)</li> </ul>
8	Will the CMP298 Original Proposal impact on your business. If so, how?	<p>Yes. The impact of the change for DG, as described on page 14, of the consultation matches our experience.</p> <p>As a company we want to connect DG and provide services to customers seeking to connect DG. Where there is a need for transmission works to be undertaken to allow DG to connect, this creates significant risks to the economic viability of the project – especially around the uncertainty on when the project can connect and the costs associated with the transmission reinforcement.</p> <p>There is also a risk from trying to plan future projects when you have poor information about how close a GSP is to the Materiality Trigger and Planning Limit.</p>

		We hope that CMP298 will provide increased certainty and more accurate and timely information – at least for the processes that are in scope.
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