

Code Administrator 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 **21 February 2022**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

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:	Zivanayi Musanhi
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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 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 in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions		
1	Do you believe that the CMP298 Original Proposal, WACM1, WACM2 and/or WACM3 better facilitates the Applicable Objectives?	<p>We believe that all four solutions better facilitate ACO (a) as they will assist with reducing the volume of individual embedded generation referrals the Licensee will process on a day-to-day basis as the solutions provide for aggregated assessments.</p> <p>ACO (b) - In view of the quicker turnaround timescales for embedded generation connection projects, when compared to transmission connecting projects, it is our view that all solutions will allow more projects to connect. This is due to the knowledge required to address investment decisions queries being shared promptly and therefore efficiently, as opposed to on a delayed basis which, in certain cases, can push away potential investors and/or cause embedded generation projects to be shelved.</p> <p>All four solutions therefore better facilitate ACO (b).</p> <p>All solutions better meet ACO (d) as experience has shown that the baseline can be inefficient and time-consuming in high embedded generation activity areas. Furthermore, all four proposed solutions provide some transparency.</p>
2	Do you support the proposed implementation approach?	<p>We consider the proposed implementation approach to be reasonable and therefore UK Power Networks supports it. However, we believe there is need for clarity on data requirements, roles and responsibilities at an early stage for the proposed implementation approach to work efficiently.</p> <p>This process has big impact to the customer service embedded generators receive on the distribution networks, improvements can deliver significant benefits. UK Power Networks has proactively collaborated and adopted new approaches to improve the customer's experience. However, codification is now required to deliver standardisation of experience across all areas and deliver the full benefits to connecting customers. This modification has taken three years to progress to this point and should now be prioritised to conclusion. UK Power Networks is fully committed to collaborating with all parties to achieve this.</p>
3	Do you have any other comments?	We support all four CMP298 solutions as they address the issues that stakeholders have been

	<p>highlighting as posing challenges for them regarding the Statement of Works/Project Progression process. We believe WACM3 is the best option as it enhances the efficiency of the process further. We recommend the quick formalisation of the Transmission Impact Assessment process in the CUSC to ensure consistency and universal application of the process nationwide.</p> <p>We suggest considering the quicker turnaround timescales for embedded generation connection projects, when compared to transmission connecting projects. In our view, this will allow more projects to connect, due to the knowledge required to address investment decisions queries being shared promptly and therefore efficiently, as opposed to on a delayed basis which, in certain cases, can push away potential investors and/or cause embedded generation projects to be shelved.</p>
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