

**Code Administrator Consultation Response Proforma****CM078: 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 [stcteam@nationalgrideso.com](mailto:stcteam@nationalgrideso.com) by **5pm on 29 April 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 Sally Musaka [Sally.Musaka@nationalgrideso.com](mailto:Sally.Musaka@nationalgrideso.com) or [stcteam@nationalgrideso.com](mailto:stcteam@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 or the industry and may therefore not influence the debate to the same extent as a non-confidential response.*

**For reference the Applicable STC Objectives are:**

- efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act*
- development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission*
- facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity*
- protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees*
- promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.*
- facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
- compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.*

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 Original Proposal and WACM1/WACM2 better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates*:</p> <table border="1"> <tbody> <tr> <td>Original</td> <td><input type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> <td><input type="checkbox"/>F</td> <td><input type="checkbox"/>G</td> </tr> <tr> <td>WACM1</td> <td><input type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> <td><input type="checkbox"/>F</td> <td><input type="checkbox"/>G</td> </tr> <tr> <td>WACM2</td> <td><input type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> <td><input type="checkbox"/>F</td> <td><input type="checkbox"/>G</td> </tr> </tbody> </table> <p><b>*CM078 has been raised as a result of a consequential CUSC modification which was not proposed by the ESO and requires the complete CUSC/STC/STCP solution to be completed before a holistic decision on the proposal can be made. We do not believe that the Original and WACM2 proposals that this response covers are positive against any of the Objectives but are essential to address the changes required to support the proposed CUSC solutions.</b></p> <p><b>No STC changes have been identified in respect of WACM1 from the CMP328 CUSC modification that this modification follows on from. This will require an STCP change only that will be raised as a separate modification.</b></p> <p>For STC Objectives A (<i>efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act</i>) &amp; G (<i>compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency</i>), we believe these are neutral against the Original Proposal and WACM2 as they will not impact NGESO delivering against the licence conditions or compliance with the Electricity Regulations.</p> <p>For STC Objective B (<i>development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission</i>), we believe this is neutral against the Original Proposal and WACM2 as will not impact the current operation of the electricity transmission system.</p> <p>For STC Objective C (<i>facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity</i>), the intention of both the Original Proposal and WACM2 is positive, as they seek to ensure consistency between distribution and transmission connected applicants by establishing a “whole system” view of the potential impacts of</p>	Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input type="checkbox"/> G	WACM1	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input type="checkbox"/> G	WACM2	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input type="checkbox"/> G
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WACM2	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input type="checkbox"/> G																			

	<p>the project. However, we feel that the proposed DIA process could hinder any positive intent due to the inefficiencies in this process which will be placed on transmission applicants so believe these to be neutral against the objective.</p> <p>For STC Objective D (<i>protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees</i>) we believe this is neutral against the Original Proposal and WACM2 as these proposals do not adversely impact or improve the security of supply and the operation of the NETS in relation to the interactions between transmission licensees.</p> <p>For STC Objective E (<i>promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC</i>), we believe that the Original Proposal will implement an inefficient process which could result in increasing costs and timescales for transmission applicants. The WACM2 proposal will improve some of these inefficiencies with the introduction of GSP Criteria to only focus on applications that require a DIA due to potential DNO impacts, but we still feel that both the Original and WACM2 proposals will be neutral against the objective due to these issues.</p> <p>For STC Objective F (<i>facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system</i>), while the intention of both the Original Proposal and WACM2 is to improve the process for transmission applicants, we believe that the Original Proposal is negative against the objective due to the inefficiencies in the process and the extended timelines and potential additional costs that could be created for transmission applicants. WACM2 looks to slightly improve this process by the introduction of GSP criteria to establish in order to establish only those applications that require a DIA, we believe that this is still neutral against the objective due to the other elements from the Original Proposal which remain.</p>
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2	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  We do not support the implementation approach for the Original Proposal as we believe this to be a significant change with internal and external process changes required along with ESO system changes to capture the concept of a DIA. We do support the implementation approach for WACM2.
3	Do you have any other comments?	<p>While both the Original Proposal and WACM2 look to implement a robust process to address the assessment of potential impacts on the distribution system for transmission connections (thus representing more of a “whole system” approach for assessment we believe the proposed process to be slow and inefficient due to the process requiring each party to complete their specific piece of work before handing to the next. This could result in the connections process for transmission applicants taking 6-9 months to conclude under the current licenced timescales.</p> <p>We believe that a more fundamental review of the connections process and associated licence conditions is required to resolve these conflicts and improve the efficiencies in relation to the timescales for assessing the impacts of transmission connections from both a transmission and distribution perspective.</p> <p><b>Note:</b> After the Code Administrator Consultation was issued, it was identified that a minor amendment needs to be made to the submitted Schedule 6 legal text document as follows:</p> <p>A NGESO <del>Connection</del> <b>Modification</b> Application submitted by NGESO to a Transmission Owner pursuant to Section D, Part Two, sub-paragraphs 2.2.1, 2.2.2, 2.2.3, 2.2.4 and 2.2.5 shall contain the following information:</p> <ul style="list-style-type: none"> <li>Whether a Distribution Impact Assessment (DIA) will be completed by the relevant Distribution Network Operator(s).</li> </ul>

		<ul style="list-style-type: none"><li>Where a DIA is required, whether this will be completed by the DNO(s) during the TO Construction Offer or once TO Construction Offer has been signed.</li></ul>
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