

CUSC Alternative Form

CMP328 WACM2:
Connections Triggering Distribution Impact
Assessment

Overview: As per the Original, except with an alternative approach to defining when the DIA process would be triggered.

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What is the proposed alternative solution?

Applicability Threshold

CMP328 Workgroup discussions have resulted in a proposal of eligibility criteria for triggering the DIA process which is partially reflective of the existing Statement of Works process; a DIA would be triggered by projects exceeding 1MVA import/export capacity which may have a material impact on the distribution network.

This approach does not appropriately take into account the potential differences and resource requirements in terms of potential impact of a new connectee. For example, a 50MW tertiary connection at a GSP is very different to a 1GW nuclear power station in terms of potential impact on the network.

The Original as written would see significantly increased workloads for all parties. For example, likely double-handling of contracts by TOs in response to DIA outcomes – also meaning additional fees for the applicant – and DSOs being burdened with additional transmission referrals and deadline obligations. Many DIAs would be performed in regions where it is clear to a DSO without the need for a DIA that there will be no material impact at the given GSP for the connection application and so a blanket approach is inefficient for all parties.

Applying the DIA process to all applicable demand connections also fails to ensure a level playing field in that demand connections to a DSO's network have no need to make applications to NGENSO to understand their impact on the transmission system, so it is unfair that a transmission demand connection would have this burden placed on them.

Proposed Change

NGESO believes a less general approach to any threshold is necessary – one which considers GSP-specific technical criteria within the requirements in order to address a wider range of potential constraints.

It is not possible to include specific trigger thresholds for any given criteria within this proposal or the CUSC as such values will vary from GSP to GSP. This proposal seeks to create a framework so that such figures would be agreed trilaterally between DSOs, NGENSO, and TOs on a per-GSP basis. This would take the form of a document hosted by NGENSO which is updated by the end of each calendar quarter each year, based on data issued to NGENSO by the associated DSOs.

Parties looking to connect to the network at any given GSP could then review the most current thresholds for the criteria applicable to their proposed solution in order to consider whether it is likely to trigger a Distribution Impact Assessment.

Further to seeking views from DSOs via a CMP328 Workgroup member, NGENSO proposes the following criteria as the basis for this process:

- Fault rating headroom
- Thermal asset rating headroom
- Power quality/harmonics
- Voltage disturbance limits
- Reverse power flow issues
- Potential ANM scheme impacts
- Size of proposed connection in relation to existing demand/generation at that site

DSOs would be able to declare any/all of the criteria as not applicable at a given GSP, meaning a new or modification connection application which does not trigger any applicable criteria thresholds would see a DIA deemed as complete without any further evaluation required at that GSP. This provides flexibility and facilitates further pragmatism, avoiding needless DIAs in at GSPs where a DSO has no concerns relating to any/all of the given criteria.

What is the difference between this and the Original Proposal?

It removes the 1MV flat threshold approach, and instead replaces it with a range of engineering criteria. The criteria will then have DIA-triggering thresholds applied on a per-GSP basis and agreed trilaterally between NGESO, the host DSO and relevant TO.

What is the impact of this change?

It introduces an approach aimed at minimising the risk of potentially unnecessary DIAs being undertaken, thus reducing the administrative impact of the modification and risk of extending timelines for completion.

The cost-benefits extend further as fewer additional fees will be applied, and this overall more efficient approach represents better value for final consumers.

The visibility of the ESO-hosted document and clear criteria will empower those considering connection options to make a more considered and complete decision at an early stage, meaning they may avoid a potentially complex and overly lengthy connection process.

Proposer's Assessment against CUSC Non-Charging Objectives	
Relevant Objective	Identified impact
(a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;	Positive: Per Original, plus discharging licence obligations in a non-discriminatory and more efficient manner
(b) 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;	Positive: Per Original, plus more level playing field of connecting asset types, and not needlessly burdensome on DSOs or connecting parties which have no material impact on network.
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and	None: Ensures that the obligations placed upon the TSOs and DSOs within the Third

	Package and Clean Energy Package (as transposed into retained UK law) in respect of acting in a none discriminatory manner and applying cost reflective charges is complied with
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	Positive: Ensures no needlessly burdensome additional administrative processes or diversion of resource
*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).	

When will this change take place?

Implementation date:

To be discussed with the Workgroup however we would envisage this alternative proposal could be implemented twelve months after an Authority decision in line with the Original.

Implementation approach:

Post-implementation period will need to allow sufficient time for consequential STC and STCP Code changes, development of supporting/training materials for use by industry, changes and ESO/DSO/TO processes.

Acronyms, key terms and reference material

Acronym / key term	Meaning
DSO	Distribution System Owner

Reference material:

None