

Workgroup Consultation Response Proforma**CMP376: Inclusion of Queue Management process within the CUSC**

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 **23 December 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.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Will Bowen
Company name:	UK Power Networks
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Phone number:	07875 117509

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.*

*The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006..

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal or any of the potential alternative solutions better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <p>Original <input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input checked="" type="checkbox"/>C <input checked="" type="checkbox"/>D</p> <p>We believe the Original Proposal best meets the Applicable Objectives.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>We support the proposed implementation approach of the CMP.</p>
3	Do you have any other comments?	No.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>

Specific Workgroup Consultation questions		
1	Do you agree with the Milestone durations proposed? Please provide the rationale for your response.	In general, it will be in customers' best interests to be consistent between Transmission and Distribution processes. There would be merit in the Proposal aligning Transmission and DNO Milestone durations, however, in the absence of this, the proposed durations are appropriate.
2	Do you agree that the time period for the milestone durations should be from the contracted Completion Date back to the date the Offer is sent to the User; or from the Contracted Completion Date back to the date the Offer is accepted by the User; or from the Contracted Completion Date back to the date the Offer becomes effective; or do you have an alternative approach?	In general, it will be in customers' best interests to be consistent between Transmission and Distribution processes. As the DNO process refers to the connection offer acceptance date the closest alignment would be Offer Acceptance date.

	Please provide the rationale for your response.	
3	There are differences between the arrangements at Transmission and Distribution. Do you agree with the reasons provided why there is different treatment and that these don't create undue discrimination? Please provide the rationale for your response.	In general, it will be in customers' best interests to be consistent between Transmission and Distribution processes. However, where there are structural and contractual differences in the Transmission and Distribution environments the differences between the processes may be unavoidable. The approach set out in the Proposal is broadly aligned with the DNO/ENA process and we do not believe create undue discrimination
4	Do you agree with the evidence requirements proposed? Please provide the rationale for your response.	Yes, we agree. The evidence requirements broadly match those required at distribution.
5	Do you agree that works specifically for a User, whose Construction Agreement has been terminated under CMP376, should be suspended until the outcome of the Appeal/Dispute. Please provide the rationale for your response.	Yes, we agree. It is our understanding that any decision to terminate a project would not be taken lightly and any continued works for the User should be avoided during any Appeals/Dispute to avoid incurring cost that may end up having to be funded by wider customers through TNUoS if the project does not ultimately materialise
6	Do you have any views on the most appropriate route for Appeals/Disputes raised by a User whose Construction Agreement has been terminated under CMP376? Please provide the rationale for your response.	In general, it will be in customers' best interests to be consistent between Transmission and Distribution processes. The route for Appeals/Dispute must be time bound and transparent as there are likely to be other Users impacted eg in the same connection queue as the Appealing User. Option 5 appears to be closest in terms of alignment with the DNO process (internal complaints procedure followed by rights to Ofgem determination)
7	Do you agree with the circumstances when Milestone Dates will be changed – the "exceptions"? Please	In general, it will be in customers' best interests to be consistent between Transmission and Distribution processes. Consideration could be given to including the additional DNO Process exception:

	provide the rationale for your response.	<ul style="list-style-type: none"> • <i>Where a relevant authority places an obligation on the project which could cause the milestone/tolerance timescales to be exceeded</i>
8	Do you agree that the associated Construction Agreement will be terminated if Milestone Dates (unless covered by the exceptions) are missed and not rectified within the 60-calendar day period? Please provide the rationale for your response.	<p>We agree. The Original Proposal, and ENA DNO process must include strict implications for noncompliance to minimise end to end process time.</p> <p>This process should be focused on encouraging customers to apply when they are ready to proceed.</p>
9	Do you agree with the proposed impacts on Milestones for different types of Modification Applications? Please provide the rationale for your response.	We agree. Where post acceptance changes are approved and there is no impact to the agreed QM dates unless exceptions apply.
10	Does the CMP376 Original proposal or any of the potential alternative solutions impact your business and/or end consumers. If so, how?	CMP376 will impact our business where UKPN accepts a construction offer with the associated Queue Milestones (i.e. for connection associated with demand / load), which may indirectly impact our end users (DNO connecting customers) associated with that construction offer.