

Code Administrator 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 4 May 2023**. 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:	Deborah MacPherson
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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.*

**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 Code Administrator Consultation questions				
1	Do you believe that the CMP376 Original proposal and/or WACMs 1-11 inclusive better facilitate the Applicable Objectives?	Mark the Objectives which you believe each solution better facilitates:		
		Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM1	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM2	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM3	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM4	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM5	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM6	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM7	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM8	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM9	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM10	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		WACM11	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
		<p>The introduction of a process whereby the contracted queue is more effectively management through the use of contracted milestones will provide a mechanism to remove delayed projects from connection queues and in doing so, ensure that network capacity is available for other projects that are ready to progress recognising that such projects could be in the existing contracted queue or new connection applications.</p> <p>With respect to each WACM, each have merit and benefits with respect to the solution they will deliver. However, it is difficult to determine which proposals holds greater weight overall. In absence of any mechanism that exists today, then all proposals can be considered as an improvement to the baseline.</p> <p>The application of QM in many respects will be iterative as part of the engagement process between the user and the ESO/TO.</p>		
2	Do you support the proposed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

	implementation approach?	The lack of grid capacity on the transmission network is the key barrier to projects being developed both at transmission and distribution. It is therefore crucial we have a mechanism to release capacity and enable projects that are in the position to progress.
3	Do you have any other comments?	<p>When a decision is being determined, careful consideration should be given to the following:</p> <ul style="list-style-type: none"> - The impact on different technology type must be fully considered such that no advantage or disadvantage is given to one technology type over the other, recognising that different technologies will develop to a different scale of project development timelines. For example, offshore versus onshore wind. - The level investment, commitment and effort that will have taken place to deliver on those early key milestones should not be underestimated and should be fully recognised along with balance of risk and evidence to ensure viable projects are not terminated unnecessarily. - A solution to queue management must be transparent and easy for users to navigate to avoid the risk of uncertainty for innovation and investment. - Ensuring the solution is not overly complex on an administrative level and suitably resourced to be successfully administered. - The principles of QM is to provide a means of constructive engagement between the User and ESO/TOs and milestone evidence to ensure projects connect in a timely manner and not detrimentally impacted when problems are encountered. <p>In our view, WACM 5 & 6 offer a good balance. Such an approach protects against the risk of any project being terminated at such a crucial stage where significant investment and development has already taken place.</p>