

Code Administrator Consultation Response Proforma

CMP330: Allowing new Transmission Connected parties to build Connection Assets greater than 2km in length & CMP374: Extending contestability for Transmission Connections

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 29 June 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 Milly Lewis Milly.Lewis@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Greg Stevenson	
Company name:	Scottish Hydro Electric Transmission plc (SHET)	
Email address:	Greg.Stevenson@sse.com	
Phone number:	07467397988	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body	<input type="checkbox"/> Interconnector <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input checked="" type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

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 (charging) Objectives are:

- a. That compliance with the use of system charging methodology facilitates effective competition in the generation and supply of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity;
- b. That compliance with the use of system charging methodology results in charges which reflect, as far as is reasonably practicable, the costs (excluding any payments between transmission licensees which are made under and accordance with the STC) incurred by transmission licensees in their transmission businesses and which are compatible with standard licence condition C26 requirements of a connect and manage connection);

- c. That, so far as is consistent with sub-paragraphs (a) and (b), the use of system charging methodology, as far as is reasonably practicable, properly takes account of the developments in transmission licensees’ transmission businesses;
- d. Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and
- e. Promoting efficiency in the implementation and administration of the system charging methodology.

***The Electricity Regulation referred to in objective (d) 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	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	<p>Mark the Objectives which you believe the proposed solution(s) better facilitates:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">Original</td> <td style="width: 10%; text-align: center;"><input type="checkbox"/>A</td> <td style="width: 10%; text-align: center;"><input type="checkbox"/>B</td> <td style="width: 10%; text-align: center;"><input type="checkbox"/>C</td> <td style="width: 10%; text-align: center;"><input type="checkbox"/>D</td> <td style="width: 10%; text-align: center;"><input type="checkbox"/>E</td> </tr> <tr> <td>WACM1</td> <td style="text-align: center;"><input type="checkbox"/>A</td> <td style="text-align: center;"><input type="checkbox"/>B</td> <td style="text-align: center;"><input type="checkbox"/>C</td> <td style="text-align: center;"><input type="checkbox"/>D</td> <td style="text-align: center;"><input type="checkbox"/>E</td> </tr> </table> <p>We have included Original & WAGCM1 together as the only difference is implementation period.</p> <p>Objectives A, B & D – Neutral – This modification is only seeking to remove Contestability from section 14 of the CUSC so we believe doing so will have a neutral impact against these objectives. We do not believe that the consultation for CMP330/374 is clear enough in what it is trying to achieve, it is convoluted for a straightforward solution.</p> <p>C – Negative – We do not believe that this modification considers developments in transmission licensees’ transmission businesses.</p> <p>This modification along with CMP414 looks to be introduced during a period of massive reform for the Transmission Network such as Connections Reform, Queue Management, and the introduction of CATOs through early competition which are taking priority within the industry.</p> <p>This modification just adds complexity and uncertainty which would not benefit most Users, only individual connections.</p>	Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	WACM1	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E
Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E									
WACM1	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E									

		<p>E – Negative – We still believe there are governance issues around CMP330/374 and the raising of CMP414.</p> <p>The votes were carried out for CMP330/374 without any thoughts given to the full package solution including CMP414, which is required for the proposer’s solution to work, but this was not presented at the time of the vote for CMP330/374.</p> <p>CMP330/374 was also raised and reraised numerous times for years to find a solution. The CUSC WG has also ignored concerns raised by the TO’s that the solution is not complete.</p>
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/>Original <input type="checkbox"/>WACM1 <input type="checkbox"/>No preference</p> <p>In line with our response to CMP414 we believe that at least six months is required. This will not only enable the Onshore TOs and ESO to establish revised ways of working internally, but for TO’s to work with Ofgem to clarify the outstanding matters in relation to licence compliance and Price Control.</p>
3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>As touched on in section one Objective C, we do not believe that this modification should be brought in during a time of such massive industry reform.</p> <p>If implemented, it would be best placed in the next Price Control period to allow for the correct changes to be made to the incorporate potential unforeseen User-driven costs.</p>
4	Do you have any other comments?	<p>Click or tap here to enter text.</p>