

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:	Neil Dewar	
Company name:	National Grid Electricity System Operator	
Email address:	Neil.dewar@nationalgrideso.com	
Phone number:	07749 576 710	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body	<input type="checkbox"/> Interconnector <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input checked="" 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?	Mark the Objectives which you believe the proposed solution(s) better facilitates:
		Original <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		WACM1 <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		<p><u>Charging Objective A</u></p> <p>ESO believes that by removing Contestability from Section 14 and with the subsequent reinstatement within Section 2 (Connections) it provides a much fuller and comprehensive description on the treatment of Contestability which:</p> <ul style="list-style-type: none"> • Provides choice in customer connections by providing for developers to make effective decisions on cost vs speed options for their build. • Promotes competition in network development which should deliver more cost-effective solutions. • Removes the existing 2km connection constraint for Contestable Assets. • Has the potential to reduce connection times and reduce costs to the overall consumer, working alongside the commitments that the ESO has made in its interim tactical measures in the 5-point plan and longer term change as part of Connections Reform

		<p><u>Charging Objective C</u></p> <ul style="list-style-type: none"> • Has the potential to enable faster connections to the transmission system • Allows developers who want to connect to the transmission system the choice to build more of their own assets than is the case today.
2	Do you have a preferred proposed solution?	<p> <input checked="" type="checkbox"/>Original <input type="checkbox"/>WACM1 <input type="checkbox"/>No preference </p> <ul style="list-style-type: none"> • ESO raised WACM1 11 months ago after an IT and business impact assessment which indicated 12 months were needed to successfully implement these changes. As with all changes these impact assessments are reviewed at regular cadence and in the most recent assessment it was indicated that this could now be implemented significantly earlier. • We have not withdrawn our WACM as this was not a change to intent of the mod just an alternative implementation date. The Authority has the decision-making power for implementation, but we would like to clarify that we can align with the Original proposed 6 month date. • We are pleased to be able to provide for this solution (should implementation be approved) as soon as possible to ensure the ESO is supporting initiatives around enhancements to the connections regime
3	Do you support the proposed implementation approach?	<p> <input checked="" type="checkbox"/>Yes <input type="checkbox"/>No </p> <ul style="list-style-type: none"> • ESO is supportive of change to allow developers to build their own connections providing choice and efficiency of connections. This initiative along with the 5-point plan and wider Reform is key to ensuring as an industry we can move at pace to build and connect the infrastructure needed to meet our UKPLC net zero future
4	Do you have any other comments?	<ul style="list-style-type: none"> • We support the Proposers Original solution and believe that approval by The Authority will bring benefits to end consumers, introduce choice and competition and contribute towards the net zero targets by enabling more renewable generation to

		<p>connect to the Transmission System. We believe that these Modification proposals would work in harmony with the recently announced measures to facilitate earlier connection to the grid.</p> <ul style="list-style-type: none">• ESO recognises that there is a consequential STC Modification CM079 currently in Workgroup phase that sits alongside CMP330/CMP374 and CMP414. This is not expected to reach the Authority until December 2023, therefore accepts that there could be a delay in the Authority being able to make a decision on all of these Modifications have been presented.
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