

Code Administrator Consultation Response Proforma

CMP414: CMP330/CMP374 Consequential Modification

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 (non-charging) Objectives are:

- a) *The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- 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;*
- c) *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- d) *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	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 type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	
<p><u>Objective B</u></p> <p>CMP414 enacts the solution derived as part of the CMP330/CMP374 Workgroup. This has resulted in a comprehensive review of Contestability with significantly new detail attributed to the topic, adding new terms and providing amendment to the Connection Application process. These changes will provide competition, choice and clarity for Users to decide on their options for a Network Connection. We believe the Modification meets objective B as it:</p> <ul style="list-style-type: none"> • Promotes competition in network development to deliver more cost-effective solutions. • Allows developers who want to connect to the transmission system to build more of their own assets than is the case today. • Removes a barrier to entry for new connections, with the removal of the existing 2km connection constraint for Contestable Assets. <p><u>Objective D</u></p> <p>By moving Contestability to Section 2 of the CUSC, it ensures that CUSC arrangements for Connections are all in the same area increasing efficiency for CUSC Users.</p>	
2	Do you support the proposed implementation approach?
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<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. 	

		<ul style="list-style-type: none"> • 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 ESO is supporting all key initiatives around enhancements to the connections regime • Noting that CMP330/374 and CMP414 are co-dependent, we would ask The Authority to approve at the same time as well as the Consequential STC Mod CM079
3	Do you have any other comments?	<ul style="list-style-type: none"> • Noting that CMP414 enacts the solution developed over the last 2 years on CMP330/374, we believe that the solution developed and agreed by the majority of the Workgroup. It has been rigorously tested and ESO support the Modification. • We support the Proposers Original solution ad 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 connect to the Transmission System. • We believe that this Modification proposal would work in harmony with the recently announced measures to facilitate earlier connection to the grid. • This Modifications have 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