

Respondent Details				Standard Consultation Questions				Specific Consultation Questions	Themes
Response Number	Organisation	Name	Organisation type	Q1 - Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?	Q2 - Do you support the proposed implementation approach?	Q3 - Do you have any other comments?	Q4 - Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Q5 - Having reviewed the proposed CM079 solution and legal text, are there any significant matters arising which you feel may have a bearing on the associated CUSC modification proposal (CMP330/374/414)?	Key points
1	Scottish Hydro Electric Transmission plc (SHET)	Greg Stevenson	Transmission Owner	Neutral for objectives A, B, C, D, F, G Negative for objective E	Yes	Yes	No	No	<p>While the Respondent saw a neutral impact of the proposed STC changes for all bar one objective, they expressed concerns that the associated CUSC modifications (330/374 & 414) could:</p> <ul style="list-style-type: none"> - Potentially impact licence obligations for being economic and efficient in network investment planning (Obj. A) - Increase inefficiency due to asset building by multiple parties, negatively impacting development & operation of Onshore TOs (Obj. B) - Greatly impact security, quality of supply and safe operation of the NETS (Obj. D) <p>The Respondent noted that the STC and subsequent STCP changes will help alleviate risks from multiple party builds due to the measures for intervention to protect network integrity and investment plans.</p> <p>The Respondent felt that the STC changes (in line with the CUSC proposals) complicated the relationship between Onshore TOs and the ESO - adding uncertainty in roles during the contestable process (e.g. 3rd party dispute arbitration)</p> <p>The Respondent noted that implementation should consider both the changes from this STC modification and also the CUSC proposals, and felt that discussions with Ofgem around Price Control and potential licence changes should be agreed before implementation. The Respondent felt that STCP changes should also be considered as part of the implementation.</p> <p>The Respondent expressed concerns that the STC and CUSC solutions don't adequately mitigate for Users failing to deliver assets, compelling TOs to intervene, without a penalty-free route for TOs to cover intervention costs through the Price Control. The Respondent referenced conversations on this matter in CMP414 not reaching sufficient agreement and welcomed further conversations with Ofgem.</p>
2	Enso Energy Ltd	Duncan Pomeroy	Generator & Storage	Yes to b, c, f & g	Yes	No	No	No	<p>In an email following the consultation submission, the Respondent explained that their selection of the objectives they believe better facillitates the Applicable Objectives is due to their support for the proposal to allow more competition and contestability in connection works.</p> <p>The Respondent accepted that TOs will not want to relinquish work and control over longer OHL connections. The Respondent acknowledged that there are preconceptions that TOs can better deliver works, but also that they slower and more expensive (which connectees have to accept without contestability).</p> <p>The Respondent felt that TOs (primarily NGET) do not have the resources to deliver connections on the scale required for coming years and therefore could be a blocker for connection works. The Respondent believes the party that pays, and assumes the risk, should choose their delivery method.</p>
3	SP Transmission	Lynne Bryceland	Transmission Owner	No	Yes	No	No	No	<p>The Respondent was supportive of the proposed solution which identifies changes to the STC in line with CMP330/374, but does not feel the solution better facillitates the objectives.</p> <p>The Respondent agreed that the implementation approach for CM079 should be in line with the relevant CUSC proposals. They feel the CUSC proposals require an extended implementation timeline considering the wider regulatory challenges, which would allow:</p> <ul style="list-style-type: none"> - TOs and ESO to establish ways of working - clarification with Ofgem re: licence compliance and contestability re: Price Control <p>The Respondent feels that consequential changes to the RIIO framework should be considered and implemented before the CUSC and STC modifications are inacted (ensuring protections in place for consumers and TOs).</p>