



**Connections strategic change & impact to CUSC
Meeting #4**

10th October 2023

Agenda

Timing	Subject	Presenter
09:00-10:05	Introduction and Welcome	Camille Gilsenan
09:05-09:55	The need for a CUSC Modification	ESO followed by group discussion
09:55-10:00	Break	
10:00-10:45	REMIT	ESO followed by group discussion
10:45-10:55	Actions Log	Secretariat
10:55-11:00	AOB	Camille Gilsenan



The need for a CUSC Modification

Joseph Henry, Angela Quinn ESO

CUSC Modification

- As part of meeting 1, the ESO presented the following slides on its stance that a CUSC modification is not required on accelerating the energy storage connections. Please see following slides.
- This viewpoint was formed on the basis that the ESO would operate within current process/SQSS and that issues would be discussed further as part of this subgroup.
- Group discussion: If you feel that a CUSC modification is needed, could you please feedback why.
- ESO legal are in attendance to answer any questions

Accelerating Energy Storage Connections policy update (point 5 of the 5 point plan)

1. The initial CUSC feedback focused on whether there would be need for any CUSC changes (see below).
2. We don't think so (yet) and will explain the CUSC and SQSS text that this falls under in the next 2 slides.

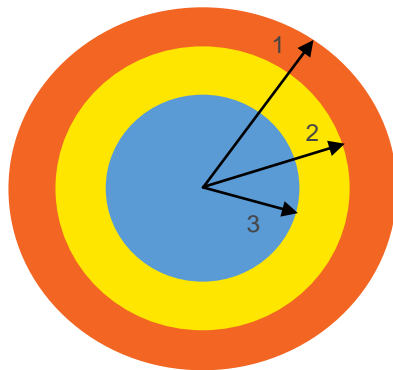
CUSC feedback session on Press article & 5 point plan

Topic	Question/feedback	ESO initial response
Energy Storage (BESS) initiative – Interim offer (non-firm)	<p>Why are these changes not within CUSC governance? We sign up to CUSC and not to policy for then ESO to extend. How can ESO just decide to trial an extended policy without due governance? How will ESO ensure non discrimination in BM/operationally once the ability for non-firm connections is extended? ESO need to understand that policy changes can have far reaching implications that have not been considered and we need ESO to understand these.</p>	<p>The proposed approach within the 5 point plan is to operate within policy/SQSS and the reference to future CUSC changes was in regards to whether in the future further changes would be needed if and when policy needs to change. We can address all questions and concerns as a deep dive in the initial TCMF sub-group. We understand that you need some visibility of how increasing the potential for non-firm connections will impact the market and customers going forward and will aim to provide some articulation of how this will work in practice operationally.</p>

Accelerating Energy Storage Connections policy update

SQSS provisions

1. The SQSS Section 2 sets out the generation connection criteria required for a SQSS compliant connection.
2. Connect and Manage (C&M) arrangements allows generators to connect ahead of the completion of wider transmission reinforcement works. CUSC Section 13 specifies the minimum enabling works to be delivered ahead of a connection.
3. The SQSS allows (2.15) for customer choice design variations for works as long as a design variation doesn't:
 1. Impact the security of the MITS
 2. Increase investment or operational costs
 3. Compromise our ability to meet other stator or licence obligations



1. Works required under SQSS to achieve a compliant connection
2. Works required under C&M to achieve a compliant connection
3. Works required under C&M + SQSS design variation to achieve a compliant connection

Variations to Connection Designs

- 2.15 Variations, arising from a generation customer's request, to the generation connection design necessary to meet the requirements of paragraphs 2.5 to 2.14 shall also satisfy the requirements of this Standard provided that the varied design satisfies the conditions set out in paragraphs 2.16.1 to 2.16.3. For example, such a generation connection design variation may be used to take account of the particular characteristics of a *power station*.
- 2.16 Any generation connection design variation must not, other than in respect of the generation customer requesting the variation, either immediately or in the foreseeable future:
 - 2.16.1 reduce the security of the *MITS* to below the minimum planning criteria specified in Section 4; or
 - 2.16.2 result in additional investment or operational costs to any particular customer or overall, or a reduction in the security and quality of supply of the affected customers' connections to below the planning criteria in this section or Section 3, unless specific agreements are reached with affected customers; or
 - 2.16.3 compromise any *transmission licensee's* ability to meet other statutory obligations or licence obligations.

The non-firm connection being developed for storage projects aligns with the provisions of the CUSC and SQSS. Instead of requiring reinforcement works to manage intact overloads (SQSS Pre-fault criteria), ESO will be developing tools and processes to manage such overloads.

Accelerating Energy Storage Connections policy update

CUSC provisions

1. 2.13.7 of the CUSC recognises that the SQSS allows for design variations where they are customer choice.

2.13.7 In the event that the **User** requests a **Connection Offer** in respect of a **Connection Site** located **Onshore** on the basis of a **Design Variation** then:

- (i) **The Company** shall only be obliged to provide such an offer in so far as such an offer satisfies the conditions detailed in Chapter 2 of the **NETS SQSS**; and
- (ii) **The Company** shall be obliged, at the request of the **User** as part of the **Connection Offer**, to provide such information that the **User** may reasonably require in order to assess the probability of **Notification of Restrictions on Availability** being issued. For the avoidance of doubt, the information that is provided by **The Company** under this clause shall be a best estimate only and is not legally binding.

REMIT Discussion – Outage Data

- Workgroup members have stated that outage data should be made public to avoid trading advantages.
- In the previous workgroup, some members highlighted that the Government and Ofgem have endorsed the presumption that all data should be published and justified why not as opposed to justified why it should be published.
- ESO advised that publishing all outage information is a wider consideration but may not change by tranche 1 going live.
- Other members are concerned that parties could breach REMIT by having the data
- Activity – Group discussion to get further views

Actions not reviewed in Session 3

ID	Description	Owner	Notes	Target Date	Status
019	Additional non-firm consideration in product design	WKW/DR	<p>-Contractual certainty, to the User, around the very rare occasions when intact system conditions apply (including details of exactly what local constraint(s) will / will not be relevant to them) such that they will be clear about the probability of uncompensated curtailment (if they sign up to this new approach);</p> <p>-Consistency of the application of this contractually by the ESO to all relevant Users; and</p> <p>-Transparency to all market participants of the volume to be curtailed, uncompensated / out of merit, by local constraint(s), as well as (real time) when the volume has been so curtailed by the ESO</p> <p>Point of consideration: - whilst the 3 points are relevant as we discuss non-firm product for BESS, they are also applicable to other customers that are seeking to connect as non-firm in the future</p>	26/09/23	CF
021	Non-firm and stacking	WKW/DR	Reach out to Scottish and Southern to see how they operate non-firm in their region	26/09/23	C/F

