

Workgroup Consultation Response Proforma

CMP427: Update to the Transmission Connection Application Process for Onshore Applicants

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 26 January 2024**. 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 Catia Gomes catia.gomes@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details	
Respondent name:	Damian Jackman	
Company name:	Field	
Email address:	damian@field.energy	
Phone number:	07840839319	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input 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 (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 Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitate the Applicable Objectives?	Mark the Objectives which you believe each solution better facilitates: Original <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D Click or tap here to enter text.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
3	Do you have any other comments?	Field Energy supports CMP427 as an attempt to introduce a mechanism to allow customers/developers that are serious in their mission to develop their projects to a ready to build state in alignment with their agreed connection date. We favour the introduction of an LoA (Letter of Authority) to be required from the landowner in order to submit an connection application. In addition, we believe that a legally binding exclusivity review should be required and the exclusivity period > 6 months accordingly. We think this will further introduce barriers to developers who have not taken the due care to consider the implications on land in relation to their grid connection application.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.

Specific Workgroup Consultation questions		
5	Do you believe that the proposed LoA meets	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	the objectives set out by Ofgem and DESNZ in CAP? If not, please provide your rationale.	Click or tap here to enter text.
6	Do you believe that an LoA should have a validity period? If so, please provide a timescale and your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Around 6 months or so to allow for validity period of application offer review period.
7	Do you agree, in principle, with the concept of an Energy Land Density table? If not, please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No However, it may be complex to administer and can only be used as a guide. Land requirements for new technologies (e.g H2 electrolysis) are still uncertain
8	Do you agree with format and the categories proposed in the Energy Land Density table? If not, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
9	Do you have different values that you can provide for the Energy Land Density table? If so, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
10	Do you believe that the LoA should be in the form of a standard template? If not, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
11	Do you believe the use of the word “authorise” within the LoA, could have adverse legal consequences? If so, please provide your rationale.	<input type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
12	Do believe the proposed LoA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	<p>template is suitable for all jurisdictions (England & Wales, and Scotland)? If not, please provide your rationale.</p>	<p>Click or tap here to enter text.</p>
<p>13</p>	<p>Do you believe that the technology type should be included in the LoA template? If you not, please provide your rationale.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>There is a chance that the technology type could change post connection application but the land requirement is not changed. Therefore committing to a technology type in the application could lock a developer in (if this is what is implied by including this in the LoA)</p>
<p>14</p>	<p>Do you consider the exemption approach to deal with exceptional circumstances appropriate? If not please provide your rationale.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Reasons for exemptions need to be made public and there needs to be clear guidance on when exemptions are permissible.</p>