

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:	Helen Stack	
Company name:	Centrica Plc (CUSC parties including Centrica Brigg Limited, Centrica Business Solutions UK Optimisation Limited, Centrica Energy and Neas Energy Ltd)	
Email address:	helen.stack@centrica.com	
Phone number:	07979567785	
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 checked="" 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 checked="" type="checkbox"/> D
		Will improve objectives a, b and d by reducing speculative connection applications and making it easier for the ESO to identify and support genuine and viable projects.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No See comment below
3	Do you have any other comments?	From our experience of obtaining LoAs for DNO connections some landowners tend to annotate the LoA, occasionally changing the wording slightly. We support standardisation of the LoA, but equally we would not want any annotation or minor change made by the landowner to result in an automatic rejection. If it remains clear that the landowner has given permission for the developer to apply for a grid connection, then it should not automatically be rejected because of annotations. Furthermore, the LoA gives the ESO permission to contact the landlord to verify their approval. The approach to this could be dealt with in the guidance.
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 the objectives set out by Ofgem and DESNZ in CAP? If not, please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes – noting that the CAP also provides for further action to be taken at a later date to further strengthen LoA connection application requirements if needed.
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 It would be good practice to have a validity period. This could be between 6-12 months. We note that UKPN uses a validity period of 3 months.
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 Click or tap here to enter text.
8	Do you agree with format and the categories proposed in the Energy Land Density table? If not, please provide your rationale.	<input checked="" 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 checked="" 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please see our response to Q3. We support the standard template but would like the ESO guidance and implementation approach to not automatically reject the LoA if the landowner has made minor clarifying amendments.
11	Do you believe the use of the word “authorise”	<input type="checkbox"/> Yes <input type="checkbox"/> No

	within the LoA, could have adverse legal consequences? If so, please provide your rationale.	We have not developed a legal view on this internally during the consultation period.
12	Do believe the proposed LoA template is suitable for all jurisdictions (England & Wales, and Scotland)? If not, please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
13	Do you believe that the technology type should be included in the LoA template? If you not, please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No It should allow for more than one technology type i.e., hybrid or co-located sites.
14	Do you consider the exemption approach to deal with exceptional circumstances appropriate? If not please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.