

**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](mailto: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](mailto:catia.gomes@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com).

Respondent details	Please enter your details	
<b>Respondent name:</b>	Charles Deacon	
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<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" 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"/> 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 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?	<p>This is a well-trodden and understood path by developers on DNO connections so smooth implementation at transmission should be possible.</p> <p>Consideration should be given to if landowners rescind authority, or we could end up with projects stuck with no viable land deal.</p> <p>No consideration appears to be given to changing the land parcel post application and degrees of flexibility on this. This could be considered in terms of queue management as with DNO connections.</p> <p>Consideration should also be given to what happens if multiple applications occur on the same piece of land. Will interactivity be used or the subsequent applications denied?</p> <p>As an IDNO we often apply for a “new supply point”, this is usually associated with a development, which could be phased and on a separate site. It is usually for the TO to determine the location of the supply point infrastructure and it is our understanding the LOA only relates to the triggering development. Consideration should be given to such phased developments.</p>
4	Do you wish to raise a Workgroup	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	Consultation Alternative Request for the Workgroup to consider?	Click or tap here to enter text.
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<b>Specific Workgroup Consultation questions</b>		
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  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  This is important to facilitate competition and prevent land-banking. Some landowners may request this in any case. Anywhere between 3 months to 1 year.
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  This is a good idea to make sure that applications are feasible. PV seems on the dense side but feasible.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No  A standard template is useful but shouldn't be insisted on. As long as specific key information is provided in the LOA, the format shouldn't matter.

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 checked="" type="checkbox"/> No  No, the wording is only limited to exploring and submitting an application for connection.
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Developers will understandably discuss technology with the landowner but a degree of flexibility is desirable if market conditions change. This is not required a distribution.
14	Do you consider the exemption approach to deal with exceptional circumstances appropriate? If not please provide your rationale.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Probably best to deal with on a case by case basis. A precursor of CPO is always negotiation with landowners. NSIP projects carry CPO powers, so this could create a mechanism for these projects to apply without an LOA, causing the same issues we are currently seeing. Best endeavours should be made to get an LOA.