

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:	William Maidment	
Company name:	Renantis / Ventient Energy (Combined Organisation)	
Email address:	william.maidment@ventientenergy.com	
Phone number:	+44 7855 982161	
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 checked="" type="checkbox"/> D Click or tap here to enter text.
2	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No We support the overall adoption of a mandatory LoA template submission requirement. We have two concerns with the approach: (1) Reservations regarding the practicality of securing multiple LoAs in situations where there is fragmented ownership across the project site and many individual landowners are engaged in facilitating project construction. (2) Subsequent concerns regarding the specified minimum acreage figure for onshore wind projects (refer to Q9).
3	Do you have any other comments?	Click or tap here to enter text.
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 We support the WACM being proposed by BayWa r.e. UK.

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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No We agree it meets the action to swiftly codify the requirement to submit a LoA for new applications. We have concerns about the minimum acreage values (see Q9).

		<p>The CAP objective also cites bringing this forward for “amended connection applications”. However, it is not clear in the proposal whether the LoA submission requirement would apply to amended connection applications.</p>
6	<p>Do you believe that an LoA should have a validity period? If so, please provide a timescale and your rationale.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Support the Original proposal - We agree that this would be unnecessary, as the CMP376 Queue Management process already incorporates time limits and would take precedence over any timeframe requirement.</p>
7	<p>Do you agree, in principle, with the concept of an Energy Land Density table? If not, please provide your rationale.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
8	<p>Do you agree with format and the categories proposed in the Energy Land Density table? If not, please provide your rationale.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
9	<p>Do you have different values that you can provide for the Energy Land Density table? If so, please provide your rationale.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>It is unclear how the proposed 10 acres per MW for onshore wind was determined by the Work Group/Proposer. We note that the four suggestions in the workbook range considerably from 4 to 24, evidencing clear uncertainty on a definitive figure.</p> <p>The following should be considered...</p> <ul style="list-style-type: none"> - Regional environmental and planning differences can lead to significant density variations, for example, a higher density of turbines and lower MWs could be expected in England rather than in Scotland. Therefore a lower value should be considered. - Clear justification should be provided in the guidance for how the value has been established. - A lower value or percentage reduction should be considered now, and further changes can be made to the guidance via the CUSC Panel overtime once ESO

		<p>has further experience assessing this new requirement.</p> <p>We are therefore supportive of the WACM being proposed by BayWa r.e. UK.</p>
10	Do you believe that the LoA should be in the form of a standard template? If not, please provide your rationale.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>We support the use of a standardised template; however, it's important for the ESO to be mindful that there might be situations where a more customised template becomes necessary (see Q14).</p>
11	Do you believe the use of the word “authorise” within the LoA, could have adverse legal consequences? If so, please provide your rationale.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>The use of “authorise” creates a wrong sense of control over the project. Landowners are being asked that they are aware that a grid application is made on their land, and then confirming they are in discussions to potentially lease/sell to the developer. To help mitigate legal consequence we support considering alternative language.</p>
12	Do you believe the proposed LoA template is suitable for all jurisdictions (England & Wales, and Scotland)? If not, please provide your rationale.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
13	Do you believe that the technology type should be included in the LoA template? If not, please provide your rationale.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
14	Do you consider the exemption approach to deal with exceptional circumstances appropriate? If not, please provide your rationale.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>The compulsory acquisition of land may also arise in the context of renewable energy projects. We consider it appropriate that a third template for exceptional circumstances is developed.</p>