

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:	Deborah MacPherson	
Company name:	ScottishPower Renewables	
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Phone number:	07734281373	
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 type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D
		<p>We are supportive of the introduction of requirement of a Letter of Authority (LoA) for new Onshore Transmission Connection Applications and agree with the majority of aspects of the proposal, and the reasonings for its introduction.</p> <p>We also support the proposer’s logic for Objectives A, C, D.</p> <p>We do however believe that the requirement to demonstrate the minimum acreage with the application to be a barrier. This could lead to delays in the early application process and risk the proposal facilitating CUSC Applicable objective (B).</p> <p>As a consequence, we have not marked against Applicable Objective B.</p>
2	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		As noted above, we fully support the introduction of the requirement of a Letter of Authority (LoA) for new Onshore Transmission Connection Applications, but believe the minimum acreage requirement, as set out in the consultation, requires further consideration before implementation to ensure this does not lead to the creation of a new barrier to entry in the development and deployment of projects.
3	Do you have any other comments?	We support the WACM proposal being brought forward by BayWa for the application of a reasonable minimum acreage requirement.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		As noted above – we support the WACM which suggests the application of a Reasonable Minimum Acreage - 50% x ESO’s number.

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

	objectives set out by Ofgem and DESNZ in CAP? If not, please provide your rationale.	As noted above, whilst we are supportive of the introduction of the LoA, we do however believe the requirement to meet the proposed acreage threshold to be too onerous and believe there to be a more balanced approach for consideration.
6	Do you believe that an LoA should have a validity period? If so, please provide a timescale and your rationale.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.
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 In principle yes, however we believe the requirement to follow the prescribed values to be potentially prohibitive. As noted above, we believe a more reasonable minimum threshold should be considered.
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 We support the categories and format but would again highlight the need for further consideration to be given to the proposed acreage. The proposal highlights the change being required to provide “alignment and consistency for Users by establishing an approach for LoA at transmission as well as distribution” however this is not in alignment with the principles of LoA requirements for distribution connecting customers where no concept like this exists.
9	Do you have different values that you can provide for the Energy Land Density table? If so, please provide your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No We believe the proposed acreage to be too onerous and believe a minimum threshold application of 50% to be more reasonable.
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 Whilst we agree with the rationale for a standard form of LoA for adoption where possible, we also believe that in instances where an agent/landowner has their own form of LoA for issue, then this should be accepted to the ESO.
11	Do you believe the use of the word “authorise” within	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	<p>the LoA, could have adverse legal consequences? If so, please provide your rationale.</p>	<p>Our response is not to comment on the legal implications of the use of the word “authorise” but instead comment based upon that of the DNO process which follows a similar acceptable approach. We note that the use of “consent” is also acceptable to DNOs in respect to the content of the LoA.</p>
<p>12</p>	<p>Do believe the proposed LoA template is suitable for all jurisdictions (England & Wales, and Scotland)? If not, please provide your rationale.</p>	<p> <input type="checkbox"/> Yes <input type="checkbox"/> No We believe this is for the ESO to satisfy themselves of the suitability between jurisdictions. </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 The NGESO application form takes account of the technology type(s) the project will comprise of. Scope of projects can and do change post acceptance with such changes being governed by the Modification Process. </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 Click or tap here to enter text. </p>