

Workgroup Consultation Response Proforma

CM086: Introducing Competitively Appointed Transmission Owners & Transmission Service Providers

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 stcteam@nationalgrideso.com by **5pm on 5 July 2023**. 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 or stcteam@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Michelle MacDonald Sandison	
Company name:	Scottish Hydro Electric Transmission plc (SHET)	
Email address:	michelle.macdonaldsandison@sse.com	
Phone number:	01738 342183	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body	<input type="checkbox"/> Interconnector <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input checked="" 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 STC Objectives are:

- efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act
- development, maintenance, and operation of an efficient, economical, and coordinated system of electricity transmission
- facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity
- protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees
- promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.

- f) *facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
- g) *compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.*

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 CM086 Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the original solution better facilitates:						
		<table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> <td><input type="checkbox"/>F</td> <td><input type="checkbox"/>G</td> </tr> </table> <p>Objective A is better facilitated. The modification seeks to introduce the concept of Competitively Appointed Transmission Owners (CATOs) to the STC, to pre-empt and avoid a defect in the code being created by the passing of the Energy Security Bill. All other objectives are neutral.</p> <p>For the avoidance of doubt this does not mean we support the introduction of CATOs. We do not believe that the benefits case for the CATO concept has been made or sufficiently evidenced.</p> <p>We do not believe that this solution better facilitates the objectives B, C, D, E, F, G as it introduces a new party into the NETS which increases risk and complexity in the operation of the system.</p>	Original	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E
Original	<input checked="" type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input type="checkbox"/> G	
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No						
		Yes, we support the implementation approach with the understanding that modification is not submitted for decision until the relevant enabling legislation has been enacted (this applies to both the primary legislation and any subsequent secondary legislation which is required).						
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						
		Click or tap here to enter text.						