

**Workgroup Consultation Response Proforma**

**CM087: Introducing Connections Process to facilitate Competitively Appointed Transmission Owners**

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](mailto:stcteam@nationalgrideso.com) by **5pm on 25 September 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 Catia Gomes [catia.gomes@nationalgrideso.com](mailto:catia.gomes@nationalgrideso.com) or [stcteam@nationalgrideso.com](mailto:stcteam@nationalgrideso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Mark Fitch/Mike Lee	
<b>Company name:</b>	Transmission Investment	
<b>Email address:</b>	Mark.fitch@tinv.com	
<b>Phone number:</b>	07789650302	
<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input 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 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:**

- a) efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act
- b) development, maintenance, and operation of an efficient, economical and coordinated system of electricity transmission
- c) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity
- d) 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
- e) 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 CM087 Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the original solution better facilitates:
		Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <input checked="" type="checkbox"/> F <input type="checkbox"/> G
		Click or tap here to enter text.
2	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<p>The current approach to modifying the Codes would benefit from an overall Blueprint for how the CATO regime will be implemented and this is driving significant work without full clarity of the high-level design of the overall process that needs to be achieved. The relationship between what is handed between the end of the tender and into the STC processes and how judgements made in the tender assessment on consumer benefits are preserved through the STC process. The use of multiple links to the Grid Code is unhelpful as parties to the STC are not party to the GC (so cannot influence change).</p>
3	Do you have any other comments?	<p>The Legal Text provided as part of this consultation has substantive differences to that provided for Workgroup 9, with members being provided less than 2 working days to consider subsequent updates, before it was issued with this consultation.</p> <p>The solution cannot therefore be regarded as the work of the Workgroup as a whole, as it includes changes not discussed or agreed with the working group before publication.</p> <p>The STCPs issued are considered not fit for purpose as they are seeking to codify a specification that will limit the ability to innovate because they are trying to treat each project like a generator – i.e. seeking to avoid any impact on any other party/TO, rather than seeing the CATO project as part of a whole system that can be economically optimised overall – as TOs do today.</p>

		<p>If the solution is locked down by codes it will be less optimal. ESO will need to be given responsibility for ensuring the whole system is compliant with the CATO project in place and determining any other system changes necessary to maintain compliance (rather than making it a requirement on each project).</p>
4	<p>Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>As per the Original, with changes to simplify what is codified into the interface boundaries, into the STCPs and avoid right to make unilateral changes post tender. Codified interface could overwritten by the ESO specification at the Tender stage, OR by agreement between ALL STC CATO-TO Lead Parties, post Tender. Where there is no agreement on a change it falls back to simple AIS or GIS boundary described (or the ESO Tender specification). STCP 18-5 interface definition and 19-7 Compliance codify the key principles, not the full detail - as it is unlikely to be possible to codify all possible cases that may be created by a CATO - therefore compliance expectations to be set at ITT2/PB stage when the solution is understood and embedded via the 18-5 interface specification template (rather than Codified in STC). Failure to agree, would see referral to independent expert.</p> <p>This solution aims to preserve the tender specification and avoid burdening every project with requirements to isolate it at each interface to the existing TOs. Instead of codifying the specification, allowing innovation in the design, with the ESO taking the role of assessing whole NETS compliance at the best overall economic benefit for the consumer (which should form part of the final tender decision making process).</p>

Specific Workgroup Consultation questions		
5	<p>Do you believe this modification facilitates the connection of a CATO to the transmission system in the most efficient and economic manner?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>The proposed STC solution provides unilateral power on the connecting TO(s) to change the specification from that the ESO tendered; setting boundaries that diminish potential benefits (with overburdening compliance requirements and overly constraining solution design); and restricting competition (by limiting the scope of projects).</p>

		<p>In addition, through the (information only) STCP the solution seeks to codify compliance requirements (as they are designed for generator connections) and are unlikely to be suitable for CATOs in general. It will place unnecessary burdens on the TOs, because it must be correct to maintain a level-playing field that all licensees and their projects connecting to the NETS would be subject to the same rules under the STC (to avoid discrimination).</p>
--	--	---