

Second Code Administrator Consultation Responses Summary
CMP427: Update to the Transmission Connection Application Process for Onshore Applicants

Consultation date: 28 February 2024 - 04 March 2024

Respondent Details			Standard Consultation Questions					Themes	
Response Number	Organisation	Name	Organisation type	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	Do you have a preferred proposed solution?	Do you support the proposed implementation approach?	Do you have any other comments?	Any Legal Text issues?	Key points
1	Centrica	Helen Stack	Generator	Yes for A, B and D only for the Original, WACM1, WACM2 and WACM3	WACM1	Yes	No	No	<p>The Respondent was supportive of all proposed solutions in better facilitating against objectives A, B and D, and was neutral to them facilitating objective C versus the Baseline.</p> <p>The Respondent noted that all proposed solutions delivered improvements to the connections regime by raising entry requirements, allowing ESO to efficiently provide connections to non-speculative applicants and efficiently implement CUSC arrangements.</p> <p>The Respondent also believed that improvements from the solutions to better deliver connections would facilitate better competition for electricity generation and supply.</p> <p>The Respondent expressed WACM1 as the best option for a 'minimum viable product' (with expected development and strengthening of requirements to enter the connections queue as part of the Connections Action Plan).</p>
2	SSEN	Michelle McDonald Sandison	Distribution Network Operator	Yes for Original and WACM1 for A,B and D / Yes for A only for WACM3	Original or WACM1	Yes	No	Yes	<p>The respondent was supportive that the Original and WACM1 better facilitated objectives A,B and D, and that WACM3 only better facilitated objective A.</p> <p>Believes that the Original and WACM1 are an improvement on the baseline as they will raise the entry requirements into transmission connections.</p> <p>Concerned that the inclusion of Template B will place a greater onus and responsibility on DNOs than is currently required under the Distribution frameworks, advising that under the current DNO process, parties who are the landowner AND the connecting party are not required to provide a letter of authority.</p> <p>Advises Second CAC confirms that BEGA/BELLA applications are out of scope of CMP427 and are, instead, governed by the letter of authority obligations with the respective DNO. However, the legal text does not reflect this as the definition of 'new connection site' in the CUSC specifically references bilateral agreements, of which the definition includes BEGAs and BELLAs.</p> <p>Believes that whilst WACM2 and WACM3 are better than the baseline, they do not go far enough in raising the entry requirements for transmission connections, and do not meet the objectives in the Connection Action Plan (CAP).</p> <p>Highly concerned at the late notice that CMP427 will also impact DNO's. Advising that the DNO's were only given 2.5 working days to assess what this change means for them and their customers, stating that this was also not directly highlighted to DNO's when the second CAC was published.</p> <p>Recognises that the Guidance document is intended to be launched prior to implementation, but requires clarification on what situations letters of authority would be applicable to for DNOs/IDNOs at the earliest possible date.</p>
3	SSE	Garth Graham	Generator/ Storage	Yes for Original and WACM1 for A,B and D / Yes for WACM2 and WACM3 for A and B only	WACM1	Yes	No	No	<p>The Respondent advised that the the views and reasoning haven't changed from the First CAC response.</p> <p>The Respondent supported the Legal Text changes set out in the Second CAC.</p>
4	ScottishPower Renewables	Deborah MacPherson	Generator	Yes for all solutions for A,B and D	WACM3	Yes	No	No	<p>The Respondent believes that all options provide a means to delivering a more efficient and robust connections application process.</p> <p>Supports the implementation of WACM3 as this provides Dfcm with the full range of options if approved.</p> <p>Supports implementation approach.</p>
5	National Grid Ventures	Muhammad Madni		None selected - The Proposal is not applicable to NGV	None selected - The Proposal is not applicable to NGV	None selected - The Proposal is not applicable to NGV	Yes	Yes	<p>The Respondent advised that this proposal is not applicable to NGV; however, he understands the underlying rationale of the approach and acknowledge its potential to help reduce speculative onshore applications.</p> <p>The respondent having reviewed the revised consultation 2 legal text, proposed the following changes as he believe that this LOA mechanism is not to apply to Offshore Transmission and Interconnectors.</p> <p>2.13.1 If a User wishes to connect a New Connection Site it shall complete and submit to The Company a Connection Application and comply with the terms thereof. An application for a New Connection Site (except for Connection Applications for Offshore Transmission or Interconnectors) shall include except in the case of an application for a New Connection Site located in Offshore Waters the provision of at least one Letter of Authority in the form of one of the templates provided in Section 2, Schedule 2.</p> <p>2.13.2 The Applicant (except where the Applicant is applying with respect to Offshore Transmission or an Interconnector) shall ensure that a Letter of Authority in the form of one of the templates provided in Section 2 Schedule 2 (or multiple such letters taken in combination) shall be for a minimum area of land pertaining to the New Connection Site set out in the Connection Application, by reference to the minimum values specified in the energy density table(s) set out in the guidance published by The Company on its website. The table(s) may be updated by The Company from time to time; any changes will not be made without prior engagement with industry.</p>