

Workgroup Consultation Response Proforma**CM094: Amendment to Bi-annual estimate provisions**

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 14 February 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 Milly Lewis milly.lewis@nationalgrideso.com or stcteam@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Aaron Priest	
Company name:	Arven Offshore Wind Farm Limited	
Email address:	aaron.priest@oceanwinds.com	
Phone number:	07881380852	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> 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 (*this will be shared with industry and the Panel for further consideration*)

Confidential (*this will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration*)

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 the Original Proposal better facilitate the Applicable Objectives?	Mark the Objectives which you believe the solution better facilitates:
		Original <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <input checked="" type="checkbox"/> F <input type="checkbox"/> G
		<p>Tackling a known barrier to entry facilitates competition and facilitates access.</p> <p>The number of customer connections that will be able to proceed is likely to significantly increase through application of this modification. High early securitisation requirements for grid connection agreements are seen as a significant barrier to entry and this will only increase with the necessary scale of future ASTI/TCSNP/CSNP works, which will include coordinated network designs.</p> <p>Without the type of changes proposed in this modification some projects may simply not go ahead.</p> <p>By enabling an increased number and diversity of market participants, such as those that would otherwise be prevented from connection due to the financial burden of high early securitisation requirements, this should increase the competition between generators.</p>
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3	Do you have any other comments?	Any decision or changes from CM094 must take cognisance of and appropriately align with CMP428. In addition, interaction with the CUSC should be clear and clarity should be given regarding application of the changes introduced by CM094 to existing agreements, particularly regarding positions where attributable liabilities have been “fixed”.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/> No

Specific Workgroup Consultation questions		
5	Do you agree that the Construction Approval	<input checked="" type="checkbox"/> Yes

	should be based on the needs case approval rather than funding approval?	<input type="checkbox"/> No We agree that the needs case approval from the Authority gives validity on the requirement for the new network need to progress.
6	Do you agree that it's non material when customers contract?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Customers contracting earlier and receiving a higher queue position will be required to securitise until unconditional needs case approval is obtained for the associated works.
7	Do you agree that the next security period is a reasonable time for the change?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No This would seem like the most appropriate and practical time for the change to occur.
8	Is it clear that prior to Construction Approval (needs case) that customers will still need to provide securities for construction works?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No We believe this is clear.
9	Does the legal text satisfy the intent of the modification in improving the security process in a transparent way?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No We have not conducted a legal review of the proposed text but support the intention of the text based on our understanding of the consultation proposal.