

Code Administrator Meeting Summary

Meeting name: CMP434 & CM095 Workgroup 20

Date: 27/08/2024

Contact Details

Chair: **Claire Goult** Claire.Goult@nationalgrideso.com

Proposer: **Ruby Pelling** ruby.pelling@nationalgrideso.com

Key areas of discussion

The key area for discussion in Workgroup 20 was to consider Workgroup members' alternatives. The Chair noted quoracy and began the Workgroup.

Timeline Updates

Workgroup members stated they would not feel comfortable discussing the legal text in the next workgroup as they would like to have a lot of time to digest the content before discussing it.

Workgroup Meeting 20 Scene Setting

A Workgroup member stated they felt it unnecessary to discuss alternatives if the ESO's proposal would continue to change. The ESO stated they do not expect to change their proposal, outside of CP30.

Alternative Requests

2 – This alternative was proposed by EDF. The main topic of this alternative is to remove the restrictions stopping capacity being built outside of the redline boundary, so long as the connection point and infrastructure remained the same. The example EDF gave is a battery site as they are very small, if there was an issue with the land then they would have to move out of their redline boundary, whereas another technology like wind would have enough land to be able to move within their redline boundary.

A Workgroup member stated that this alternative would continue the issues that the current connection queue has, such as projects that meet all of the criteria that still cannot be built. Workgroup members stated they would like to see a compromise between current redline boundaries and no redline boundaries. A Workgroup member asked EDF to clarify what is meant by connection infrastructure, as ambiguity on the subject could lead to a lot of the same issues the queue currently has.

3 - This alternative was proposed by EDF. The purpose of this alternative is to remove forward planning milestones and keep the current planning milestone dates. Many Workgroup members stated they felt this alternative could risk "gutting" the ESO's proposal and would lead to many projects sitting idle in the queue. The ESO stated that they planned to reduce planning milestones.

4 - This alternative was proposed by ENWL. This alternative was to define the sizes of large, medium, and small power stations, rather than using the definitions that will be set by GC117.

5/6 - These alternatives were proposed by ENWL. The point of these alternatives was to raise the lower boundary of what is considered a small power station.

Alternative 5 was to raise the size boundary of small power stations from 1MW to 10MW in England and Wales. A similar increase in size was also proposed in Scotland, but some analysis would be needed to find the ideal boundaries.

Alternative 6 was to use voltage levels to define these limits, with the intention being that smaller HV connected community and local generation projects could be made exempt from the primary process. Clarity would be needed to see how these changes would affect generation in Scotland.

7 – This alternative was proposed by Hydrostar and was focused on Long Duration Energy Storage (LDES). Parts of the alternative were to increase the duration of LDES from 6 hours to 8 hours, have all LDES projects require a DCO, and to harmonise timelines across the forthcoming LDES Cap-and-Floor competition, DCO, and interconnection reforms.

8 - This alternative was proposed by Renewable UK and was used to include an explicit requirement within the CUSC for DNOs to have to submit the Gate 2 to the ESO within 30 days. Workgroup members questioned if the CUSC would be the right place for this idea. The proposer of alternative 17 noted this alternative was very similar to theirs. The ESO stated that part of their updated proposal included the DNOs having to submit the technical data from a submission within 10 days. This alternative will likely require updating due to the modification Proposer's updated proposal.

9 – This alternative has been withdrawn.

10 - This alternative was proposed by Point and Sandwick. The purpose of this alternative was to include an indication of cost to gate 1, to enable smaller generation schemes to know which projects were viable to develop or not. A Workgroup member stated they do not believe distributed projects would choose to go through gate 1.

11 - This alternative was proposed by Point and Sandwick. This proposal was to include a new project designation for community generators to allow them to connect faster than other types of projects, as community generators are not able to apply for generation rights as fast as more traditional project owners. A Workgroup member stated they believed that the current ESO proposal is discriminatory against community projects, and that alternative 11 would help solve this issue. Workgroup members debated on whether the code has the ability to implement this alternative.

12 - This alternative was proposed by Point and Sandwick. This proposal would allow any new grid connection to have 20%, as a rough starting figure, of its capacity ringfenced for community generators.

13 - This alternative was proposed by Low Carbon. This alternative would propose to codify any capacity reallocation mechanism. This proposal is effectively having the current process continue but still make projects meet Gate 1. The proposer of this alternative is concerned that the ESO will use the capacity of the projects removed from the queue to reserve capacity for CNDM and project reservation. Workgroup members stated they have to see the methodologies proposed by the ESO before they can truly consider alternatives. The proposer would like this alternative to stop the ESO from using terminated capacity for CNDM or any other project designations.

14 - This alternative was proposed by Low Carbon. This alternative is proposed to codify the redline boundaries post gate 2, as the ESO are proposing to leave this in methodology.

15/16 - These alternatives were proposed by Q-energy. There were no questions as these alternatives were being removed.

ESO

17 - This alternative was proposed by Q-energy. This alternative was similar to alternative 8 but was different enough that the proposer would like to keep it open.

18 – This alternative was proposed by Northern Powergrid. There were no questions as this alternative has been removed.

19 – The proposer for this alternative was not present so it was not discussed.

20 – This alternative was proposed by Epsilon Generation. The purpose of this alternative was to require planning permission or submission as part of Gate 2 criteria. Workgroup members debated on how much risk this would cause developers to take on, and how much risk is acceptable. Workgroup members asked the ESO to share the reasons why land ownership was chosen as the criteria over planning rights.

21 – This alternative was proposed by Epsilon Generation. There were no questions as this alternative was removed.

Next steps

Action 52 was closed.

Actions to be circulated to Workgroup members.

AOB

A Workgroup member asked to see an update on what the ESO thinks on technology change.

Actions

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
11	WG2	All	Add agenda time to respond to papers provided by Workgroup members	Ongoing	WG4	Open
20	WG6	JN/AQ	Consider legal perspective on NESO designation	Remain open until new solution discussed	TBC	Open
22	WG6	JH	Consider if an impact assessment by the ESO on the proposed solution is achievable within the current timescales		TBC	Open
24	WG7	MO	Consult ESO legal team to consider using existing legal definitions for clarification (substantial modification) and reconsider terminology being used (material/significant/allowable)	To remain open until legal text review	TBC	Open
31	WG9	MO	More detail requested by Workgroup to make a judgement on Connection Point and Capacity Reservation (including offshore)	Remain open until new solution discussed	TBC	Open

35	WG10	AC/AQ	ESO to confirm whether additional uncertainty clauses (which have been appearing in offers recently) will remain		TBC	Open
38	WG11	MO	Updated Action: To expand on licence change conditions/obligations, including any suggested changes to the Licensed offer timescales		TBC	Open
40	WG11	RF	To share licence changes programme timescales with Workgroup		TBC	Open
41	WG12	PM	To share analysis/feedback which informs the Gate 2 period offer acceptance to submission of application for Planning Consent		TBC	Open
43	WG16	DH/GL	Investigate whether changes are required to STCP 18-7 based on the CMP434 solution	Anticipated that no changes need to be made, but will confirm this once it has been investigated further	ASAP	Open
49	WG17	MO	Updated action: SMEs to share a short summary of the methodologies, timescales and the underlying principles of this modification. This should include a plan for engagement with stakeholders.		TBC	Open
50	WG18	AQ	Provide the ESO view on the legal position associated with Element 1 of the Proposal in the context of the Ofgem decision-making process on code change		TBC	Open
51	WG18	HM	Provide further explanation/evidence on the perceived flexibility / timing differences between changing the content of a methodology and changing the content of a code.		TBC	Open
53	WG18	DD/SG	Clarify whether developer requested changes within a Significant Modification Application could potentially be so significant that		TBC	Open

			they result in an application having to be restarted or having the contract terminated, etc		
54	WG18	RP/AP	Clarify whether the ESO will still be providing indicative dates to DNOs Pre-Gate 2	TBC	Open
55	WG18	DD	Re-review consultation feedback specific to the ESO position on any Non-GB Projects (as consulted on within the WG Consultation) and either confirm that the position still remains unchanged or confirm new position to the Workgroup.	TBC	Open
56	WG18	MO	Confirmation of whether financial instruments will be raised as a separate modification.	TBC	Open
57	WG18	AQ	Consider Innova response and confirm whether ESO feels that Element 9 is consistent with Electricity Regulations in terms of discrimination.	TBC	Open
58	WG18	PM	Clarify whether anything in Proposal could allow the Gate 2 criteria to be amended and applied retrospectively i.e. with a Gate 2 project then no longer being a Gate 2 project, even where it is complying with its ongoing compliance obligations.	TBC	Open
59	PM		Element 11 – Produce examples to provide clarification to the Workgroup (slide 25) on how using installed capacity could work in practice	TBC	Open
60	OM		Element 11 – Consider Workgroup Member request to provide analysis to show which projects could benefit from the Proposals (slide 26) to have a milestone adjustment ability for ESO e.g. where a developer asks for an earlier date and gets a later date, or asks for and gets a later date (but this is due to a normal programme timescales e.g. mega projects) to avoid unintended outcomes.	TBC	Open

61	RPa/MO	Element 17 - To confirm BEGA application information i.e. in relation to what happens where a relevant small or medium EG project gets a different GSP to what they expected (as a result of the Gate 2 process and via the DNO) (Garths question)	TBC	Open
62	RPa	Element 17 – To provide a pictorial representation of BEGA/BELLA process as proposed	TBC	Open
63	RPa	Element 17 – Create an additional swimlane/s for chevron diagram for BEGA/BELA	TBC	Open
64	RPa	Element 17 - To produce prescribed timelines/timescales (Garths request as per slide 13) for both small and large	TBC	Open
66	MO	More information on timeline on CP30 plans/impacts to be shared once the are available (to compare to the code change programme, including voting timetable).	TBC	Open

Attendees

Name	Initial	Company	Role
Claire Goult	CG	Code Administrator, ESO	Chair
Lizzie Timmins	LT	Code Administrator, ESO	Chair
Andrew Hemus	AH	Code Administrator, ESO	Tech Sec
Stuart McLarnon	SM	Code Administrator, ESO	Tech Sec
Graham Lear	GL	ESO	Proposer
Ruby Pelling	RP	ESO	Proposer
Lee Wilkinson	LW	Ofgem	Authority Representative
Rory Fulton	RF	Ofgem	Authority Representative
Alison Price	AP	ESO	SME
Michael Oxenham	MO	ESO	SME
Paul Mullen	PM	ESO	SME
Alex Ikonik	AI	Orsted	Workgroup Member
Allan Love	AL	SPT	Workgroup Member
Andy Dekany	AD	NGV	Workgroup Member

Anthony Cotton	AC	Green Generation Energy Networks Cymru Ltd	Workgroup Member
Barney Cowin	BC	Statkraft	Workgroup Member
Bill Scott	BS	Eclipse Power Networks	Workgroup Member
Brian Hoy	BH	Electricity North West Limited (ENWL)	Workgroup Member
Claire Hynes	CH	RWE Renewables	Workgroup Member
Claire Witty	CW	Scottish Power Energy Networks	Workgroup Member
Deborah MacPherson	DM	Scottish Power Renewables	Workgroup Member
Ed Birkett	EB	Low Carbon	Workgroup Member
Deborah MacPherson	DM	Scottish Power Renewables	Workgroup Member
Garth Graham	GG	SSE Generation	Workgroup Member
Grant Rogers	GR	Qualitas Energy	Workgroup Member
Greg Stevenson	GS	SSEN Transmisson (SHET)	Workgroup Member
Helen Snodin	HS	Fred Olsen Seawind	Workgroup Member
Helen Stack	HES	Centrica	Workgroup Member
Hooman Andami	HA	Elmya Energy	Workgroup Member
Jade Ison	JI	NGET	Workgroup Member
Kyran Hanks	KH	CUSC Panel member	Workgroup Member
Laura Henry	LH	NGED	Workgroup Member
Luke Scott	LS	Northern Powergrid	Workgroup Member
Mark Field	MF	Sembcorp Energy (UK)	Workgroup Member
Mohammad Bilal	MB	UK Power Networks	Workgroup Member
Paul Jones	PJ	Uniper	Workgroup Member
Paul Youngman	PY	Drax	Workgroup Member
Philip John	PJ	Epsilon Generation	Workgroup Member
Phillip Addison	PA	EDF Renewables	Workgroup Member
Ravinder Shan	RS	FRV TH Powertek Limited	Workgroup Member
Robin Prince	RP	Island Green Power	Workgroup Member
Ross O Hare	RH	SSEN	Workgroup Member
Simon Lord	SL	ENGIE	Workgroup Member
Zygimantas Rimkus	ZR	Buchan Offshore Wind	Workgroup Member