

Workgroup Consultation Response Proforma**CMP328: Connections Triggering Distribution Impact Assessment**

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 cusc.team@nationalgrideso.com by **5pm** on 19 March 2021. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation, please contact Rob Pears Rob.Pears@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
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For reference the Applicable CUSC (non-charging) Objectives are:

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;*
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- Promoting efficiency in the implementation and administration of the CUSC arrangements.*

**Objective (c) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).*

Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the CMP328 Original Proposal better facilitates the Applicable Objectives?	Yes
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
Modification Specific Workgroup Consultation questions		
5	For DNO respondents, please describe your process and timescales associated with current Third Party Works applications	NA
6	For Third Party Works users, please describe your experience of using the Third Party Works process, specifically awareness of and timescales associated with the process; are there any defects in the TPW process that the DIA process does not address?	Experience so far has been mixed based on DNO. Each DNO has different requirements and timelines. Some DNOs have been very reluctant to even perform an assessment. Some DNOs require a full connection offer is signed, even in the case of no works. The present TPW process is simply not for purpose and presents a significant (and avoidable) barrier to investment in utility scale renewable projects.
7	Annex 6 provides a summary of the WG's view of the pros/cons of both the Third Party Works and proposed Distribution Impact Assessment process.	
7a	Do you agree with this?	Yes
7b	Do you have any additional pros or cons you wish to add?	No
8	Applicability - Do you agree with the applicability criteria proposed? Please provide your rationale.	Yes, the DIA should apply to all connections and not just tertiary. The rationale being that the issues are the same regardless of the connection type and not unique to tertiary connections.

9	Contractual milestones - Do you foresee a better way of updating contractual milestones to reflect the result of a Distribution Impact Assessment?	Capturing the milestones in the Appendix J makes sense. The DIA should take place at the connection application stage.
10	Fees and Costs - Do you agree with the Proposal that any costs as a result of the DIA should be passed from the DNO to the Transmission applicant via the ESO?	The DIA should be part of the connection application process and in this way the costs should be included. Note a more reasonable/justifiable fee needs to be levied by the DNOs.
11	Clean Energy Package (CEP) - Currently CUSC Section 4 documents the payments that will be made by the ESO for Mandatory Services with the site-specific details captured in the Bilateral Connection Agreement. In your view, how/where should any compensational arrangements be documented for DNOs curtailing Transmission connected generators.	In the BCA. Details of the curtailment in Appendix D. Payment for the setting of the services as one-off works in Appendix AB.
12	Which of the following do you believe should be included when assessing options/impacts under the proposed DIA process;	
12a	impact upon distribution connected generators/storage with transmission export capacity (TEC)	Y
12b	impact upon distribution connected generators/storage without transmission export capacity (TEC)	Y
13	Should the DIA process be triggered upon receipt, or acceptance of an application from the transmission customer and please provide your reasoning.	Upon receipt. As the cost of 3 rd party works will be part of the total connection CAPEX, i.e. in the same way one-off works need to be known. So ideally the DIA result will be available before the connection offer is required to be signed.