

Workgroup Consultation Response Proforma**CMP330: Allowing new Transmission Connected Parties to build Connection Assets greater than 2km in length**

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 16 February 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 Ren Walker Lurrentia.Walker@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Ryan Ward
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For reference the Applicable CUSC (charging) Objectives are:

- That compliance with the use of system charging methodology facilitates effective competition in the generation and supply of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity;*
- That compliance with the use of system charging methodology results in charges which reflect, as far as is reasonably practicable, the costs (excluding any payments between transmission licensees which are made under and accordance with the STC) incurred by transmission licensees in their transmission businesses and which are compatible with standard licence condition C26 requirements of a connect and manage connection);*
- That, so far as is consistent with sub-paragraphs (a) and (b), the use of system charging methodology, as far as is reasonably practicable, properly takes account of the developments in transmission licensees' transmission businesses;*
- 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 system charging methodology.*

**Objective (d) 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 CMP330 Original Proposal better facilitates the Applicable Objectives?	<ul style="list-style-type: none"> a. <i>Yes - a reduction in connection time and cost will enable benefits to be passed on to the end user. Increased competition should be encouraged.</i> b. <i>Yes – further consideration is required if a second comer provisions is implemented</i> c. <i>Yes</i> d. <i>N/A</i> e. <i>N/A</i>
2	Do you support the proposed implementation approach?	<ul style="list-style-type: none"> - <i>Yes - no system changes are required as a result of this modification.</i> - <i>Timelines are deemed to be reasonable</i>
3	Do you have any other comments?	- <i>No</i>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	- <i>N/A</i>
Modification Specific Workgroup Consultation questions		
5	What, if any role should Ofgem have in this proposed new process?	- <i>No - over and above OFGEM's normal role where parties can refer a national grid offer under a dispute process</i>
6	Should there be a clearer limit on the length of a Connection Asset construction?	<ul style="list-style-type: none"> - <i>We have no strong views on unlimited but believe that a limit could restrict others to reduce overall costs and timescales.</i> - <i>Providing an agreement is in place, distance should not matter.</i>
7	Can you identify/list scenarios in which this agreement shouldn't be given?	- <i>N/A</i>
8	<p>The Workgroup is considering what the length beyond 2km might be appropriate and would welcome views as to whether it should be prescribed as</p> <ul style="list-style-type: none"> i) as a set length; or ii) to the nearest economic point of connection to the NETS; or iii) be unlimited; or iv) another option (if so please explain). 	<ul style="list-style-type: none"> - <i>Distance should be iii)</i> - <i>if the works are contestable and customer funded, SPR should retain the ability to choose our own route regardless of TO/ESO's view of whether the connection is economic – SPR is paying for it, and there are lots of reasons they might want a longer connection route that don't look obvious to the TO.</i>

	Which of these four options do you believe is appropriate and in respect of option 1 do you have a view as to what the set length should be?	
9	Should there be a clearer limit on the length of a Connection Asset construction?	- <i>No, provided power quality can be maintained within agreed limits at the point of connection</i>
10	Should the 2km cap be removed or a new cap be put in place. Please justify a new cap and to what level?	- <i>2km cap should be kept in place with the addition of clause of where all parties are in agreement</i>
11	Should the commercial charging boundary limitation of 2km vary from one connection to another dependent on basis of construction choices of a User?	- <i>No, differentiating from this may cause unnecessary confusion</i>
12	Should the cap on length of Connection Assets be removed or revised?	- <i>Yes, removed.</i>
13	Should approval be required from the Transmission Owner and NGESO for connections in excess of 2km? Please provide rationale as to on what basis the approval would be denied?	<ul style="list-style-type: none"> - <i>Yes, ESO/TO should be able to veto proposals if there is an obviously justifiable alternative and/or it's not possible to accommodate.</i> - <i>This is required if the distance becomes unlimited.</i>
14	Should additional costs incurred over and above the cost the TO would have incurred be fully paid for by the User concerned? Are there any circumstances where the TO should fund some/all of these costs?	<ul style="list-style-type: none"> - <i>No - unless the TO cannot provide the services, the costs should be covered by the user concerned.</i> - <i>If a third party can provide the service with a shorter delivery time and/or lower cost then the incumbent TO should contribute.</i>
15	Where a Transmission Connection Asset has been capially contributed and a second Party wishes to connect to those Assets, it is proposed to re-classify those assets as infrastructure assets. It is proposed to implement arrangements similar to the second comer rule for the capially contributed element. Do you agree with this suggestion?	<ul style="list-style-type: none"> - <i>Yes – it seems sensible to align with distribution rule with the exception of the time limit.</i> - <i>Using NAV is a frustrating, T and D connections should be more similar not less, so should have the same time limit and rules for asset depreciation etc. as far as reasonably possible.</i> - <i>SPR could see a future case for the Second Comer returning to a 15 year</i>

		<i>time limit in both D and T in future, but don't agree that it should.</i>
16	Do you foresee any legal or regulatory barriers or introducing a second comer rule equivalent into the CUSC for this purpose?	- <i>No</i>