

STC Modification Proposal Form

CM078: Connections Triggering Distribution Impact Assessment

Overview: The proposal seeks to make changes to the System Operator Transmission Owner Code to reflect CUSC modification CMP328 relating to Transmission connections that trigger an impact assessment on the Distribution network.

Modification process & timetable

1	Proposal Form 15 March 2022
2	Code Administrator Consultation 06 April 2022 - 29 April 2022
3	Draft Modification Report 17 May 2022
4	Final Modification Report 06 June 2022
5	Implementation 10 working days following Authority decision on CMP328 and PM0120

Status summary: The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.

This modification is expected to have a: Medium impact
ESO and Transmission Owners

Proposer's recommendation of governance route	Standard Governance modification to proceed to Code Administrator Consultation
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Who can I talk to about the change?	Proposer: David Halford David.Halford@nationalgrideso.com 07812 774065	Code Administrator Contact: Sally Musaka Sally.Musaka@nationalgrideso.com 07814 045448
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What is the issue?

Currently within the CUSC there is no mechanism or specific process covering arrangements for Transmission connections that could have an impact on the Distribution system. Impacts are primarily direct physical impacts including but not limited to Fault Level rating, Thermal rating, Voltage control, Power Quality, Control and Protection systems. Impacts are also commercial where explicit Transmission access rights that the Distribution system owner or embedded Users may have is impacted, and where commercially sensitive data, is held only by the ESO and the relevant CUSC Users and only publicly available in part. Without this modification there is not an appropriate process in place as a means of a Transmission User facilitating connections that trigger Distribution impact assessments that covers both physical impacts and explicit Transmission access rights impacts.

CUSC modification CMP328 aims to address this issue with the introduction of a "Distribution Impact Assessment" (DIA) process, which will establish a transparent process with clear and defined timescales for all parties involved.

As a result of the CUSC modification, it has been identified that changes will be required to the STC to enable and facilitate the changes within CMP328.

The Final Modification report for CMP328 is now with the Authority awaiting a decision, but it has been confirmed by the Authority that the associated STC/STCP changes will also need to be presented in order for a final decision to be made and implemented.

Why change?

As part of the proposed CMP328 CUSC modification, it has been identified that changes will be required to Schedule 5 and Schedule 6 of the STC to enable and facilitate the changes within CMP328.

Changes are required to the NGESO Connection Application which is submitted to TOs to support DNO impact assessments.

The NGESO Connection Application will be amended in order to:

- Inform the TO if a Distribution Impact Assessment will be completed by the relevant DNO(s)
- If the Distribution Impact Assessment will be completed by the relevant DNO(s) during the TO Construction Offer process or once the TO Construction Offer has been completed and signed by all parties.

The CUSC modification also contains alternative solutions (WACM1 & WACM2) which have been presented to the Authority and will need to be reflected in the STC/STCP changes (if required).

WACM1 - Enhancement of the current Third Party Works (TPW) process.

WACM2 - An applicability criteria is used rather than the original Proposal blanket 1MVA threshold as to establish if a DIA is required.

What is the proposer's solution?

Original Proposal and WACM2

Changes will be required to STC Schedules 5 & 6 to ensure the TO is aware if a Distribution Impact Assessment will be required and where in the connection process this will be actioned.

WACM1

No changes are required to the core STC. This WACM will impact STCP18-6 only. Modification PM0120 has been raised at the same time as this modification which details the STCP changes required to reflect this change.

Draft legal text

In development.

What is the impact of this change?

Proposer's assessment against STC Objectives	
Relevant Objective	Identified impact
(a) efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act	Positive Creates an efficient process for connections to the Transmission system that require a distribution impact assessment
(b) development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission	Neutral
(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	Positive Creates opportunities for generation to connect at both Transmission and Distribution
(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	Neutral
(e) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC	Positive Creates an efficient process for connections to the Transmission system that require a distribution impact assessment
(f) facilitation of access to the national electricity transmission system for generation not yet connected to the	Positive

national electricity transmission system or distribution system;	Provides a clear and documented process for generation to connect to the Transmission system
(g) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.	Neutral

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories

Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Neutral
Lower bills than would otherwise be the case	Neutral
Benefits for society as a whole	Neutral
Reduced environmental damage	Neutral
Improved quality of service	Neutral

When will this change take place?

Implementation date

Implementation timelines in line with CUSC modification CMP328 and STCP modification PM0120.

CMP328 solutions	STC changes required	STCP changes required
Original Proposal and WACM2	STC Schedules 5 & 6 via CM078	STCP18-1 and STCP18-6 via PM0120
WACM1	No STC change required	STCP18-6 via PM0120

It is recommended by the Code Administrator that the STC Panel give advance approval to implement the corresponding STCP changes to facilitate the CMP328 solution decided by the Authority. The expectation is that the Authority will issue decisions for CMP328 and CM078 on the same day. This will enable an efficient implementation of all three modifications 10 working days following the Authority decision.

Date decision required by

If the proposed governance route is accepted by Panel, the Final Modification Report for CM078 will be submitted to the Authority on 6 June 2022. The decision is required as soon as possible to enable CMP328 - if this is not implemented by November 2022, the benefits of this would be reduced.

Proposer's justification for governance route

Governance route: Standard Governance modification to proceed to Code Administrator Consultation

The required STC changes are minor and consultation with affected parties have taken place to gain approval prior to submission of the Proposal.

Interactions

Grid Code BSC CUSC SQSS
 European Other Other
 Network Codes modifications

This modification is required as a follow-on from CUSC modification CMP328.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CM	Code Modification
CUSC	Connection and Use of System Code
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
DIA	Distribution Impact Assessment
DNO	Distribution Network Operator
ESO	Electricity System Operator
TO	Transmission Owner
TOCO	Transmission Owner Connection Offer
NGESO	National Grid Electricity System Operator

Reference material

- [CMP328 - Connections Triggering Distribution Impact Assessment](#)