

Code Administrator Consultation Response Proforma

CMP427: Update to the Transmission Connection Application Process for Onshore Applicants

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 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 catia.gomes@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Garth Graham	
Company name:	SSE Generation	
Email address:	Garth.graham@sse.com	
Phone number:	01738 456000	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input checked="" 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 Panel or the industry for further consideration)

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.

**The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.*

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

Standard Code Administrator Consultation questions										
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	<p>Mark the Objectives which you believe the proposed solution(s) better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> <tr> <td>WACM1</td> <td><input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> <tr> <td>WACM2</td> <td><input checked="" type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> <tr> <td>WACM3</td> <td><input checked="" type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D</td> </tr> </table> <p>In our view all four options (the Original plus the three WACMs) all better facilitate Applicable Objectives (a) and (d) whilst being neutral in terms of (c).</p> <p>In terms of WACM2 and WACM3 whilst we agree that, overall, they are better than the status quo (the 'baseline') we have concerns that the 50% may be considered as being not in conformance with what the CAP sets out (on page 35), in terms of providing:</p> <p><i>"...confirmation that the project developer has formally engaged in discussions with the landowner(s) in respect of the rights <u>needed</u> to enable the construction of the project on their land". [emphasis added]</i></p> <p>Accordingly, we believe that WACM2 and WACM3 (as it is modelled on WACM2) is neutral in terms of Applicable Objective (b) (along with (c), as noted above).</p>	Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	WACM1	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	WACM2	<input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D	WACM3	<input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D
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WACM1	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D									
WACM2	<input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D									
WACM3	<input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D									
2	Do you have a preferred proposed solution?	<p> <input type="checkbox"/>Original <input checked="" type="checkbox"/>WACM1 <input type="checkbox"/>WACM2 <input type="checkbox"/>WACM3 <input type="checkbox"/>Baseline <input type="checkbox"/>No preference </p> <p>Click or tap here to enter text.</p>								
3	Do you support the proposed	<p> <input checked="" type="checkbox"/>Yes <input type="checkbox"/>No </p>								

	implementation approach?	We support the proposed implementation.
4	Do you have any other comments?	<p>We note the alacrity with which the industry has come together to develop, in close co-operation with the ESO, the detail needed to implement, practically and efficiently, one (of a number) of the items identified in the joint DESNZ/Ofgem November 2023 Connections Action Plan (CAP), namely the Letter of Authority.</p> <p>We look forward to continuing to work with our peers and the ESO on addressing, in detail, the practical implementation of other items in the CAP, as well as progressing with the various industry code changes arising from the ESO's planned Connections Reform package of December 2023.</p> <p>As the CMP427 Workgroup deliberations have made clear, further work is needed on additional enhancements to the Letter of Authority (being introduced by this CMP427) covering, amongst other things, similar letters for all Users (not just Onshore generation) such as Offshore, Interconnectors and Demand as well as addressing the scenario of multiple letters being (inadvertently?) issued for the same area of land (often referred to as the 'duplicate' issue).</p> <p>We look forward to working constructively alongside other stakeholders and the ESO on all these connections reform related future endeavours during the rest of 2024.</p>