

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:	Gareth Williams	
Company name:	Scottish Power Transmission PLC	
Email address:	Gareth.williams@spenergynetworks.co.uk	
Phone number:	N/A	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input checked="" 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?	Mark the Objectives which you believe the proposed solution(s) better facilitates:
		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 type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		WACM3 <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
<p>Compared to the baseline, we believe the Original and WACM1 will help raise the entry requirements for transmission applications, and will indicate a more robust project viability. This in turn will provide Transmission Owners more assurances when making strategic investment choices and better facilitating objectives A, B and D.</p> <p>We believe that WACM2 does not meet the objective of the Connection Action Plan (CAP), as the proposal will contain a table showing de minimis thresholds for acceptable connection applications (set at 50% of the typical acreages per technology type). We recognise the difficulty some projects will have obtaining the 100% returns as set out in the original and WACM1, but think compelling this strengthens the entry requirements in line with the CAP intentions.</p> <p>In relation to WACM2, it is important that the connecting customer provides a LOA for the whole land they have authority for, directly related to the project they are seeking a transmission connection for. We would only propose providing a connection quote based on the LOA submitted as part of the original request, and any changes or additional LOAs, related to the connection, may require a reapplication (incurring any associated costs).</p> <p>We consider WACM3 to meets Applicable Objective A, compared to the baseline, but is Neutral on the other objectives.</p>		

2	Do you have a preferred proposed solution?	<input checked="" 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>Our preference would either be the Original or WACM1 as they both meet the objective set out in Ofgem/DESNZ's CAP and better facilitate the Applicable CUSC objectives. We believe that the requirements to submit LOAs as detailed in these proposals will reduce speculative applications and free up capacity for projects that are more likely to progress to connection.</p> <p>WACM1 would allow projects seeking to connect who are unable to obtain an LOA an alternative (equivalent) option via Template 'C'. This seems a reasonable approach, and we don't have any objections to this option.</p>
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>We believe 10 working days seems reasonable to allow the ESO to prepare appropriately to facilitate the LOA process.</p>
4	Do you have any other comments?	Click or tap here to enter text.