

**Workgroup Consultation Response Proforma****CMP428: User Commitment liabilities for Onshore Transmission circuits in the Holistic Network Design**

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](mailto:cusc.team@nationalgrideso.com) by **5pm** on **21 March 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 [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Sarah Graham	
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<b>Phone number:</b>	07464675593	
<b>Which best describes your organisation?</b>	<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 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 Workgroup, 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*

d) *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 Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe the Original solution better facilitates:</p> <p>Original      <input type="checkbox"/>A   <input checked="" type="checkbox"/>B   <input type="checkbox"/>C   <input checked="" type="checkbox"/>D</p> <p>Ocean Winds supports the Original Proposal as this better facilitates CUSC objectives. The modification is expected to enhance the number of offshore wind generation projects that become feasible and the number of projects being able to go ahead. The imposition of steep initial securitisation demands in grid connection agreements poses an enormous obstacle to entry and risks impacting offshore wind deployment scenarios. If this modification was not taken forward, certain projects may face abandonment.</p> <p>Incentivising the development of offshore wind projects will facilitate effective competition in generation.</p> <p>Providing clarity on what assets constitute Attributable Works for offshore wind generation projects will promote efficiency in the administration of the CUSC.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>
3	Do you have any other comments?	<p>The proposed definition of “Excepted Works” is based on the asset classification published by the Authority on 19 October 2022. The Authority shall need to ensure that future asset classifications, for example the one due to be published following the publication of the HNDFUE/tCSNP, use the same asset classification “onshore transmission (reinforcement)” in order for the asset classification to operate as intended within the provisions introduced to the CUSC.</p>
4	Do you wish to raise a Workgroup	<p><input type="checkbox"/>Yes (the request form can be found in the <a href="#">Workgroup Consultation</a> Section) <input checked="" type="checkbox"/>No</p>

	Consultation Alternative Request for the Workgroup to consider?	Click or tap here to enter text.
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### Specific Workgroup Consultation questions

5	Does the solution help provide better cost reflectivity for liabilities?	Yes, the solution ensures that onshore transmission reinforcement that has wider system benefit is not securitised by only one User or a small group of Users.
6	Do you agree the title of this modification should be changed to 'User Commitment liabilities for Onshore Transmission (reinforcement) in the Holistic Network Design'?	Yes, the proposed solution and legal text is focused on the asset classification of "onshore transmission (reinforcement)", rather than generally onshore transmission circuits. There are other onshore transmission circuits identified in the Network Options Assessment 2021/22 Refresh that accompanies the HND that do not fall within the scope of the proposed modification. It would therefore seem logical to update the title as proposed to align with this.