

Introduction

As part of the ENA Open Networks Project, a SoW Focus Group was held on 23rd March 2018 in London with the following key objectives:

- To introduce the new Transmission Impact Assessment (TIA) process that will, in time, replace the current Statement of Works Process
- To undertake a critical review from stakeholders of the TIA
- To clarify and review the transition approaches that will be in place during the phased roll-out of the TIA

This paper captures the feedback from stakeholders who participated in the Focus Group with the key comments noted and how they will be addressed under the project.

This paper sits alongside the published slides that accompanied the Focus Group.

The table below sets out the general comments made along with any practical key points and their associated follow up actions to be taken.

Focus Group Feedback	Open Networks Follow Up Action
IDNO in attendance noted difficulties with the current Statement of Works (SoW) Process and timescales between the IDNO and DNO in respect of getting an answer as to impact. Also noted that there is a lack of clarity of the end-customers position in any queue.	Process to be considered and covered under Workstream 1, Product 9 during 2018
It was noted from a number of attendees that there was a lack of consistency across (and within) DNOs in terms of the application of SoW	Process to be considered and covered under Workstream 1, Product 9 during 2018
Question was asked in relation to where DNOs share capacity with another DNO GSP and is it possible to publish information on this.	Best practice for management of this to be considered under Workstream 1, Product 9 during 2018
Suggestion that it would be useful for DNOs to incorporate a link to the relevant areas of CUSC that provide further information on securities and liabilities to allow customers to undertake their own due diligence.	Noted – all DNOs to be advised of this request from stakeholders.
Customers again highlighted that it is not always clear if their offer is being made under a SoW/App G Trial.	Noted – all DNOs to be advised of this request from stakeholders and to ensure offers are clearly worded to advise if offers being made in accordance with existing SoW CUSC provisions or under TIA/App G.
How will success of the trials be measured?	Feedback from stakeholders along with demonstration of time to make offer inclusive of transmission impact versus previous SoW Project Progression process.
How will BEGA/BELLA applications be considered under the new Transmission Impact Assessment (TIA)/App G	This will be addressed as part of the GBSO CUSC Modification CMP298 and Workstream 1, Product 9
Concern that the proposed approach for the CUSC Modification is 'Light Touch' and therefore what protection does it offer customers as a result.	Concerns will be raised to CUSC Modification CMP298 Working Group Members.

Focus Group Feedback	Open Networks Follow Up Action
Generally, stakeholder advised that they would like to know who was in the queue and relative positions of each contracted party to allow parties to make an assessment as to likelihood of capacity being available. Existing information published by DNOs is not done on a consistent basis.	This will be considered as part of the work under Workstream 1, Product 8
Specific request was made in relation to the development and publication of a GSP queue.	This will be considered as part of the work under Workstream 1, Product 8
Comment noted regarding the application by one DNO of multiple moratorium periods that can occur during interactivity and how this is managed, often leading to significant delays for customers.	This will be raised with Workstream 2, Product 5
Comment regarding 3 month timescales for the GBSO to make an offer to the DNOs, however was suggested that a technical solution would be available within 3-4 weeks allowing for an offer to the DNOs within 6-8 weeks.	Where possible, the Transmission Owner will always endeavour to provide an offer to the GBSO as soon as possible, however an offer within 6-8 weeks of clock start will not always be possible.
Treatment of application fees under the TIA process – what will this be and how will it be managed?	Treatment of application fees between DNO and Customers will now be addressed as part of Workstream 4. Application Fees relating to the TIA process will be addressed via the CUSC Modification.
Not clear how interactivity will be managed across Transmission and Distribution where the TIA/App G is in place.	This will be addressed as part of the work under Workstream 2, Product 5

General Comments/Observations
The majority of attendees commented that the proposed changes to move away from SoW were seen as a positive step forward.
One developer commented that during project development, they need to mitigate commercial risks which the existing process makes it difficult to do. As the new TIA process aims to provide timely and meaningful information, this is also a very positive step forward.
It was noted that there was no significant objection to the requirement for securities to be placed, so long as enough information was made available to customers.
It was noted that where the Transmission Owner has already undertaken studies, this helps to speed up the process and inform DNOs as to likely impact on the transmission network which ultimately helps inform the DER customers.
Where materiality threshold has been set at 50MW, this is generally due to this being the medium power station threshold.
Current SoW Project Progression process requires payment of invoice to be made before the application will be deemed live.
SoW and Project Progression Applications process does not currently have good visibility at present however was noted that new TIA process will improve on that greatly.
Noted that transition from SoW to TIA will be different for each DNO.