



AMENDMENT REPORT

CUSC Proposed Amendment CAP095

Removal of Operational Day Reference from Ex-Post Publication of Response Information

The purpose of this report is to assist the Authority in their decision of whether to implement Amendment Proposal CAP095

Amendment Ref	CAP095
Issue	1.0
Date of Issue	19 th August 2005
Prepared by	National Grid

I DOCUMENT CONTROL**a National Grid Document Control**

Version	Date	Author	Change Reference
0.1	10/08/05	National Grid	Draft for internal comment
0.2	11/08/05	National Grid	Draft for external comment
1.0	19/08/05	National Grid	Final Version for Submission to Authority

b Document Location

Nation Grid Website:

<http://www.nationalgrid.com/uk/indinfo/cusc>

c Distribution

Name	Organisation
The Gas and Electricity Markets Authority	Ofgem
CUSC Parties	Various
Panel Members	Various
National Grid Industry Information Website	

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1.0 SUMMARY AND RECOMMENDATION

- 1.1 CAP095 was raised as a consequence of an issue identified by the BSSG in the implementation phase of CUSC amendment CAP047. Specifically, the publication of mandatory frequency response information. CAP047 directs that Ex-Post publication of response utilisation should be published on an operational day basis (05:00 to 05:00). However CAP047 also directs that Ex-Ante submission and publication of response holding prices and capability should be submitted, and subsequently published, on a calendar day/month resolution (midnight to midnight). CAP095 proposed to align the publication of Ex-Post and Ex-Ante information by publishing all information on a calendar day/month resolution.
- 1.2 CAP095 was proposed by NGC and submitted to the CUSC Amendments Panel for consideration at its meeting on 24th June 2005. The Amendments Panel determined that the issue was appropriate to proceed to wider industry consultation by National Grid.
- 1.3 The Consultation Paper for CAP095 was published by National Grid on 6th July 2005, placed on the CUSC website and copies sent to Core Industry Document Owners and CUSC Parties. Responses were invited by close of business on 5th August 2005.
- 1.4 National Grid received a total of 2 responses to the consultation for CAP095.

National Grid Recommendation

- 1.7 National Grid believe that this modification would resolve a minor inconsistency between the publication of Ex-Ante and Ex-Post frequency response information. Consequently, the view of National Grid is that it will be to the benefit of the industry and therefore recommend approval of CAP095.
- 1.8 It was proposed that implementation took place on 1st October 2005. As this would line up with the implementation date for CAP047. Whilst National Grid believes that this is the most appropriate implementation date, were an Authority decision not have been made by the 1st October, we believe implementation should be 10 days after an Authority decision that has come about on or after 1st October 2005 as clearly CAP095 could not be implemented prior to the 1st October.

2.0 PURPOSE AND SCOPE OF THE REPORT

- 2.1 This Amendment Report has been prepared and issued by National Grid under the rules and procedures specified in the Connection and Use of System Code (CUSC) as designated by the Secretary of State. It addresses issues relating to aligning inconsistencies between publication of Ex-Ante and Ex-Post frequency response information.
- 2.2 Further to the submission of Amendment Proposal CAP095 (see Annex 1) and the subsequent wider industry consultation that was undertaken by National Grid, this document is addressed and furnished to the Gas and Electricity Markets Authority (“the Authority”) in order to assist them in their decision whether to implement Amendment Proposal CAP095.

- 2.3 This document outlines the nature of the CUSC changes that are proposed. It incorporates National Grid's recommendations to the Authority concerning the Amendment. Copies of all representations received in response to the consultation have been also been included and a 'summary' of the representations received is also provided. Copies of each of the responses to the consultation are included as Annex 3 to this document.
- 2.4 This Amendment Report has been prepared in accordance with the terms of the CUSC. An electronic copy can be found on the National Grid website, at <http://www.nationalgrid.com/uk/indinfo/cusc>

3.0 THE PROPOSED AMENDMENT

Background

- 3.1 The companion wording to CUSC amendment CAP047 directs that Ex-Post publication of mandatory frequency response information should be published on an Operational Day resolution (05:00 to 05:00). Ex-Ante submission and publication of response holding prices and response capability are to be submitted and published on a calendar day/month resolution (midnight to midnight).

The Proposed Amendment

- 3.2 CAP095 proposed to align the time frames of Ex Ante and Ex Post information by publishing all mandatory frequency response information to the market, as required under section 4 of the CUSC, on a calendar day basis (midnight to midnight). The changes included removal of the word "Operational" from CUSC section 4.1.3.13A (c) and removal of the definition of Operational Day from CUSC section 11.3 (Definitions)

4.0 IMPLEMENTATION AND TIMESCALES

- 4.1 The recommendation is that CAP095 is implemented on 1st October 2005. As this is consistent with the implementation date for CAP047. Whilst National Grid believes that this is the most appropriate implementation date, were an Authority decision not have been made by the 1st October, we recommend implementation should take place 10 days after an Authority decision that has come about on or after 1st October 2005, as clearly CAP095 could not be implemented prior to the 1st October.

5.0 IMPACT ON THE CUSC

- 5.1 CAP095 requires amendments to Section 4 (Balancing Services) of the CUSC and Section 11 (Interpretation and Definitions). The text required to give effect to CAP095 is contained in Annex 2 of this document.

6.0 ASSESSMENT AGAINST APPLICABLE CUSC OBJECTIVES

- 6.1 By aligning all published mandatory frequency response information National Grid will better facilitate CUSC objective (a) – The efficient discharge by National Grid of the obligations imposed on it by the act and the Transmission License, by ensuring that this data is transparent and understandable as possible.

7.0 IMPACT ON CUSC PARTIES

7.1 No impact has been identified on CUSC Parties from the Proposed Amendment.

8.0 IMPACT ON CORE INDUSTRY DOCUMENTS

8.1 CAP095 will not have an impact on Core Industry Documents or other industry documents.

9.0 VIEWS AND REPRESENTATIONS

9.1 This Section contains a summary of the views and representations made by consultees during the consultation period in respect of the Proposed Amendment.

Views of Panel Members

9.2 No responses to the CAP095 consultation document were received from Panel Members.

View of Core Industry Document Owners

9.3 No responses to the CAP095 consultation document were received from Core Industry Document Owners.

Responses to Consultation

9.4 The following table provides an overview of the representations received. Copies of the representations are attached as Annex 3.

Reference	Company	Supportive	Comments
CAP095-CR-01	Centrica	Yes	
CAP095-CR-02	EDF Energy	Yes	

9.5 National Grid received a total of two responses to the Consultation. All respondents were supportive of the Proposed Amendment. None of the respondents proposed a Consultation Alternative Amendment.

10.0 SUMMARY OF PANEL MEMBERS VIEWS

10.1 The Panel considered CAP095 at its meeting on 24th June and agreed that National Grid should proceed to industry consultation on CAP095.

11.0 NATIONAL GRID RECOMMENDATION

11.1 National Grid supports the amendments to Section 4.1.3.13A (c) and Section 11.3 (Definitions) as proposed by CAP095.

12.0 COMMENTS ON DRAFT AMENDMENT REPORT

- 12.1 National Grid received no responses following the publication of the draft Amendment Report.

Annex 1 - Amendment Proposal Form

CUSC Amendment Proposal Form	CAP: 095
Title of Amendment Proposal: Removal of Operational Day Reference from Ex Post Publication of Response Information	
Description of the Proposed Amendment (mandatory by proposer): CUSC section 4.1.3.13A (c) – removal of the word “Operational” from the description relating to Ex Post publication of frequency response information.	
Description of Issue or Defect that Proposed Amendment seeks to Address (mandatory by proposer): The companion wording to CUSC amendment CAP047 directs that Ex-Post publication of mandatory frequency response information should be published on an Operational Day resolution (05:00 to 05:00). Ex-Ante submission and publication of response holding prices and response capability are to be submitted and published on a calendar day/month resolution (midnight to midnight). This proposal aligns the time frames of Ex Ante and Ex Post information by publishing all mandatory frequency response information to the market, as required under section 4 of the CUSC, on a calendar day basis (midnight to midnight).	
Impact on the CUSC (<i>this should be given where possible</i>): Remove the word “Operational” from CUSC section 4.1.3.13A (c) Remove the definition of Operational Day from CUSC section 11.3 (Definitions)	
Impact on Core Industry Documentation (<i>this should be given where possible</i>): None	
Impact on Computer Systems and Processes used by CUSC Parties (this should be given where possible): None	
Details of any Related Modifications to Other Industry Codes (<i>where known</i>): The concept of an Operational Day is introduced into the CUSC with the implementation of CAP047 on 1/10/05. It relates to the description of the new information reporting obligations this modification will introduce.	
Justification for Proposed Amendment with Reference to Applicable CUSC Objectives** (mandatory by proposer): By aligning Ex Ante and Ex Post information provision NGC will better facilitate CUSC objective (a) – The efficient discharge by NGC of the obligations imposed on it by the Act and the Transmission Licence.	

Details of Proposer: Organisation's Name:	National Grid Transco
<i>Capacity in which the Amendment is being proposed:</i> (i.e. CUSC Party, BSC Party or "energywatch")	CUSC Party
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	Robert Smith National Grid Transco 01926 654076 robert.smith@ngtuk.com
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	John Greasley National Grid Transco 01926 656313 john.greasley@ngtuk.com
Attachments (Yes/No): No If Yes, Title and No. of pages of each Attachment:	

Notes:

1. *Those wishing to propose an Amendment to the CUSC should do so by filling in this "Amendment Proposal Form" that is based on the provisions contained in Section 8.15 of the CUSC. The form seeks to ascertain details about the Amendment Proposal so that the Amendments Panel can determine more clearly whether the proposal should be considered by a Working Group or go straight to wider National Grid Consultation.*
2. *The Panel Secretary will check that the form has been completed, in accordance with the requirements of the CUSC, prior to submitting it to the Panel. If the Panel Secretary accepts the Amendment Proposal form as complete, then he will write back to the Proposer informing him of the reference number for the Amendment Proposal and the date on which the Proposal will be considered by the Panel. If, in the opinion of the Panel Secretary, the form fails to provide the information required in the CUSC, then he may reject the Proposal. The Panel Secretary will inform the Proposer of the rejection and report the matter to the Panel at their next meeting. The Panel can reverse the Panel Secretary's decision and if this happens the Panel Secretary will inform the Proposer.*

The completed form should be returned to:

Richard Dunn
Panel Secretary
Commercial Frameworks
National Grid Company plc
National Grid Transco House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA
Or via e-mail to: CUSC.Team@uk.ngrid.com

(Participants submitting this form by email will need to send a statement to the effect that the proposer acknowledges that on acceptance of the proposal for consideration by the Amendments Panel, a proposer which is not a CUSC Party shall grant a

licence in accordance with Paragraph 8.15.7 of the CUSC. A Proposer that is a CUSC Party shall be deemed to have granted this Licence).

3. Applicable CUSC Objectives** - These are defined within the National Grid Company Transmission Licence under Section C7F, paragraph 15. Reference should be made to this section when considering a proposed amendment.

Annex 2 – Proposed Text to modify CUSC

Part A - Text to give effect to the Proposed Amendment

Change Marked Version

Section 4

- 4.1.3.13A (a) **NGC** shall use reasonable endeavours to publish on its web-site by the 16th **Business Day** of each calendar month, a report containing the following information in respect of each applicable **User's BM Unit(s)** to apply in respect of the next following calendar month:-
- (i) the payment rates for **Primary Response**, **High Frequency Response** and **Secondary Response** to apply in determining the **Holding Payments** for the next following calendar month as determined in accordance with Paragraph 4.1.3.13;
 - (ii) the available **Response** volume (in such form and manner as shall be prescribed by **NGC** from time to time).
- (b) Where any payment rates published in a report issued in accordance with Paragraph 4.1.3.13A(a) are rectified by **NGC** in accordance with Paragraph 4.1.3.13(e), **NGC** shall as soon as reasonably practicable thereafter publish the rectified report on its web-site.
- (c) In respect of each ~~Operational Day~~ day in a calendar month, **NGC** shall, by the ninth **Business Day** of the calendar month following that calendar month, publish on its web-site in respect of all **BM Units** details of instructions issued by **NGC** in accordance with Paragraph 4.1.3.4 for each of **Primary Response**, **High Frequency Response** and **Secondary Response** (in such form and manner as shall be prescribed by **NGC** from time to time).

Proposed Changes to Paragraph 11.3 of the CUSC (Definitions)

~~“Operational Day” as defined in the Grid Code;~~

Annex 3 – Copies of Representations Received to Consultation

This Annex includes copies of any representations received following circulation of the Consultation Document (circulated on 2nd July 2005, requesting comments by close of business on 5th August 2005).

Representations were received from the following parties:

No.	Company	File Number
1	Centrica	CAP095-CR-01
2	EDF Energy	CAP095-CR-02

Reference	CAP095-CR-01
Company	Centrica

The Centrica logo consists of the word "centrica" in a bold, blue, sans-serif font. The letter "i" has a small orange dot above it. A horizontal blue line is positioned below the text.

taking care of the essentials

Lindsey Paradine
Commercial Frameworks
National Grid Company plc
National Grid Transco House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Centrica Energy

Millstream East,
Maidenhead Road,
Windsor,
Berkshire SL4 5GD

Tel. (01753) 431052
Fax (01753) 431150
www.centrica.com
Our Ref.
Your Ref.
15 November 2018

Dear Lindsey,

CUSC Amendment Proposal CAP095 – Removal of Operational Day Reference from Ex-Post Publication of Response Information

Centrica welcomes this opportunity to comment on this Amendment Proposal. Centrica agrees that the Amendment Proposal will better facilitate the Applicable CUSC Objectives. Ensuring there is consistency in respect of the reporting timescales for publishing data will better achieve Applicable Objective (a).

Centrica supports the proposed legal text and the proposed implementation date, which is consistent with the implementation timescales of CAP047.

If you have any questions regarding this response please ring me 01753 431137.

Yours sincerely,

Mark Manley
Contract Manager

Reference	CAP095-CR-02
Company	EDF Energy

Lindsey Paradine
National Grid
NGT House
Gallows Hill
Warwick
CV34 6DA



Date 5 August 2005

Dear Lindsey,

CUSC Amendment Proposal CAP095: Removal of operational day reference from ex-post publication of response information.

EDF Energy are pleased to provide the following response to the consultation on CUSC Amendment Proposal CAP095.

We agree with National Grid's conclusion that this amendment will resolve a minor inconsistency between the publication of ex-ante and ex-post frequency response information and ensure that published data is transparent and understandable .

As such we believe that this proposed amendment will better facilitate CUSC objective (a) – the efficient discharge by NGC of the obligations imposed on it by the Act and the Transmission Licence.

We support the proposed implementation of this amendment on or as soon as possible after 1 October 2005 to ensure that the defect is addressed prior to the first publication of CAP047 data.

We hope that you will find these comments helpful. Please do not hesitate to contact me if you wish to discuss this issue further.

Yours sincerely

Rupert Judson
Electricity Market Strategy Manager
0207 752 2526

Annex 4 – Copies of Comments received on the Proposed Amendment Report

This Annex includes copies of any representations received following circulation of the Draft Amendment Report (circulated on 11th August 2005, requesting comments by close of business on 18th August 2005).

No representations were received from the any parties.