



National Grid

CONSULTATION DOCUMENT

CUSC Amendment Proposal CAP087 Revisions to Request for Urgency Process

The purpose of this document is to consult on Amendment Proposal CAP087 with CUSC Parties and other interested Industry members

Amendment Ref	CAP087
Issue	1.0
Date of Issue	27 th April 2005
Prepared by	National Grid

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

Version	Date	Author	Change Reference
0.1	25 th April 2005	National Grid	Initial Draft for internal comment
1.0	27 th April 2005	National Grid	Formal version for release

b Document Location

National Grid website:

http://www.nationalgridinfo.co.uk/cusc/mn_consultation_index.html

c Distribution

Name	Organisation
CUSC Parties	Various
Panel Members	Various
Interested Parties	Various
Core Industry Document Owners	Various
National Grid Industry Information Website	-

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1.0 SUMMARY

- 1.1 Currently, 8.21.3 of the CUSC states that the Panel Chairman or Secretary will only consult with the Authority if the Amendments Panel or a majority of the Amendments Panel agrees that the proposal should be treated as Urgent. CAP087 seeks to place an obligation on the Panel Chairman to consult with the Authority on all requests for urgency pertaining to CUSC Amendment Proposals.
- 1.2 CAP087 was proposed by British Gas Trading and submitted to the CUSC Amendments Panel for consideration at their meeting on 22nd April 2005. The Amendments Panel determined that the Amendment Proposals should go straight to wider industry consultation.
- 1.3 This document initiates this wider consultation exercise and invites views on CUSC Amendment Proposal CAP087. The consultation closing date is Wednesday, 1st June 2005.

2.0 INTRODUCTION

- 2.1 This is a consultation document 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.
- 2.2 Further to the submission of Amendment Proposal CAP087, this document seeks views from industry members relating to the Amendment Proposal.
- 2.3 This consultation document outlines the nature of the CUSC changes that are proposed. Representations received in response to this consultation document will be included in National Grid's Amendment Report that will be furnished to the Authority for their decision.
- 2.4 This consultation document 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>, and the Amendment Proposal form.

3.0 THE AMENDMENT PROPOSAL

- 3.1 Section 8 of the Connection Use of System Code (CUSC) contains the rules for raising an Amendment Proposal. The process allows for any CUSC Party to recommend to the Panel Secretary that an Amendment Proposal should be treated as urgent. This request is then presented to the Amendments Panel via the Panel Chairman and or the Panel Secretary who will consider the request for urgent status. The Panel Chairman will only consult with the Authority if the decision reached is in accordance with 8.21.3 that the proposal should be treated as an Urgent Amendment Proposal.
- 3.2 CAP087 (Annex 2) seeks to amend Section 8.21 of the CUSC, which details the process for requesting that an Amendment Proposal be treated urgently. Section 8.21.3 states that the Panel Chairman or Panel Secretary will only consult with the Authority if the Amendments Panel or a majority of the Amendments Panel agrees that the proposal should be treated urgently. This

Amendment Proposal would extend that obligation on the Panel Chairman to consult with the Authority on all requests for urgency.

- 3.2 The text of the Amendment Proposal is at Annex 2 and the amended CUSC text to give effect to CAP087 is contained in Annex 1. CAP087 and CAP085 are interactive should CAP085 be implemented before CAP087 and the legal text reflects this.

4.0 ASSESSMENT AGAINST THE APPLICABLE CUSC OBJECTIVES

- 4.1 The terms of the Transmission Licence require National Grid to establish and operate procedures for the modification of the CUSC, including the modification procedures themselves, so as to better facilitate, achievement of the Applicable CUSC Objectives. An obligation on the Panel Chairman to consult with the Authority on all requests for urgency would improve efficiency in the amendment procedures themselves by ensuring that the Authority always had the opportunity to properly consider whether an Amendment should be treated as Urgent, where a request had been made. Hence any such Amendment would be more likely to be dealt with in the way that the Authority deemed optimum going forwards (i.e. Urgent or non-Urgent) than is currently the case. In NGC's view CAP087 would therefore better facilitate the applicable CUSC Objectives, and allow National Grid to more efficiently discharge its obligations.

5.0 IMPLEMENTATION AND TIMESCALES

- 5.1 There is no material impact associated with the timing of the implementation of CAP087. It is therefore proposed that implementation takes place with effect from 10 days after the Authority's decision. However, as with all other aspects of the Consultation, NGC would welcome views on this proposed implementation date.

6.0 INITIAL VIEW OF AMENDMENTS PANEL

- 6.1 The Amendments Panel members were all broadly supportive of CAP085 and determined that CAP085 should be subject to wider consultation to seek industry views on the Amendment Proposal and whether such amendment of the CUSC would better facilitate the achievement of the Applicable CUSC Objectives.

7.0 INITIAL VIEW OF NATIONAL GRID

- 7.1 National Grid supports the amendments to Section 8.21 as proposed by CAP087, and believes that it would be a sensible development for the Authority always to be consulted where a request has been made for an Amendment to be treated as Urgent.

8.0 VIEWS INVITED

- 8.1 National Grid is seeking the views of interested parties in relation to the issues raised by Amendment Proposal CAP087 and issues arising from the proposed timescale for implementation of CAP087.

8.2 Please send your responses to this consultation to National Grid by no later than close of business on Wednesday, 1st June 2005.

8.3 Please address all comments to the following e-mail address:

Lilian.Macleod@ngtuk.com

Or alternatively, comments may be addressed to:

Lilian Macleod
Commercial Frameworks
National Grid Transco
NGT House
Warwick Technology Park
Gallows Hill
Warwick
Warwickshire, CV34 6DA

Annex 1 - Proposed Text to Modify CUSC

Part A - Text to give effect to the Proposed Amendment

The following text will apply should the Authority approve CAP087 before CAP085:

- 8.21.4 If following 8.21.3 it is not agreed that the **Amendment Proposal** should become an **Urgent Amendment Proposal** then the **Panel Chairman** or, in his absence, the **Panel Secretary** shall forthwith consult the **Authority** as to whether such **Amendment Proposal** is an **Urgent Amendment Proposal** and, if so, as to the procedure and timetable should apply in respect thereof.

The following text will apply should the Authority approve CAP085 before CAP087:

- 8.21.1.4 If following 8.21.1.3 it is not agreed that the **Amendment Proposal** should become an **Urgent Amendment Proposal** then the **Panel Chairman** or, in his absence, the **Panel Secretary** shall forthwith consult the **Authority** as to whether such **Amendment Proposal** is an **Urgent Amendment Proposal** and, if so, as to the procedure and timetable should apply in respect thereof.

Annex 2 - CAP087 Amendment Proposal (Revisions to Request for Urgency Process)

CUSC Amendment Proposal Form	CAP:087
<p>Title of Amendment Proposal:</p> <p>Revisions to Request for Urgency Process</p>	
<p>Description of the Proposed Amendment (mandatory by proposer):</p> <p>Section 8 of the Connection Use of System Code (CUSC) contains the rules for raising an Amendment Proposal. The process allows for any CUSC Party to recommend to the Panel Secretary that an Amendment Proposal should be treated as urgent. This request is then presented to the Amendments Panel via the Panel Chairman and or the Panel Secretary who will consider the request for urgent status. The Panel Chairman will only consult with the Authority if the decision reached is in accordance with 8.21.3 is that the proposal should be treated as an Urgent Amendment Proposal.</p> <p>BGT are proposing changing the process. The Amendments Panel or Panel Chairman or Panel Secretary will continue to consider the request for urgency but whoever considers the request will be required to make a recommendation to the Authority as to whether the Amendment Proposal is treated as urgent or not.</p>	
<p>Description of Issue or Defect that Proposed Amendment seeks to Address (mandatory by proposer):</p> <p>This proposal is seeking to amend Section 8.21 of the CUSC, which details the process for requesting that an Amendment Proposal be treated urgently. Section 8.21.3 states that the Panel Chairman or Panel Secretary will only consult with the Authority if the Amendments Panel or a majority of the Amendments Panel agrees that the proposal should be treated urgently. This Amendment Proposal would extend that obligation so that the Panel Chairman consults with the Authority on all requests for urgency.</p>	
<p>Impact on the CUSC (this should be given where possible):</p> <p>Section 8.21.3 will need amending to reflect the obligation to consult with the Authority in all instances and not merely when there is agreement that an Amendment Proposal is treated urgently.</p> <p>The proposed legal text is attached in Appendix 1.</p>	
<p>Impact on Core Industry Documentation (this should be given where possible):</p> <p>BGT do not believe there will be any impact .</p>	
<p>Impact on Computer Systems and Processes used by CUSC Parties (this should be given where possible):</p> <p>BGT do not believe there will be any impact</p>	
<p>Details of any Related Modifications to Other Industry Codes (where known):</p> <p>BSC Modification P187 – Introducing the ability for a Party to request urgent status and for it to be considered by the Authority.</p>	

Justification for Proposed Amendment with Reference to Applicable CUSC Objectives**
(mandatory by proposer):

BGT believe this modification will better facilitate the achievement of the Applicable CUSC Objectives. The Amendment Proposal will enable the Authority to consider all requests for urgency, which will enhance consistency of the process and therefore also improve the efficiency of the change management process.

BGT believe it will also better facilitate competition, as it will enhance perception within the market that if an issue is material to a CUSC Party the timetable for progressing the Amendment Proposal will be considered by the Authority who will make the final decision on the merits of the Amendment Proposal.

Details of Proposer: Organisation's Name:	Mark Manley
Capacity in which the Amendment is being proposed: (i.e. CUSC Party, BSC Party or "energywatch")	CUSC Party
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	Mark Manley British Gas Trading (BGT) 01753 431137 mark.manley@centrica.co.uk
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	Simon Goldring British Gas Trading (BGT) 01753 431051 simon.goldring@centrica.co.uk
Attachments (Yes/No): If Yes, Title and No. of pages of each Attachment:	

Notes:

- 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.
- 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

NGT 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 C10, paragraph 1. Reference should be made to this section when considering a proposed amendment.