



National Grid

AMENDMENT REPORT

CUSC Proposed Amendment CAP087

Revisions to Request for Urgency Process

The purpose of this report is to assist the Authority in their decision of whether to implement Amendment Proposal CAP087

Amendment Ref	CAP087
Issue	1.0
Date of Issue	13 th June 2005
Prepared by	National Grid

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

Version	Date	Author	Change Reference
1.0	13 th June 2005	National Grid	Formal version for submission to the Authority

b Document Location

National 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	

II	CONTENTS TABLE	
I	DOCUMENT CONTROL	2
	a National Grid Document Control	2
	b Document Location	2
	c Distribution	2
II	CONTENTS TABLE	3
1.0	SUMMARY AND RECOMMENDATION	4
2.0	PURPOSE AND SCOPE OF THE REPORT	4
3.0	THE PROPOSED AMENDMENT	5
4.0	IMPLEMENTATION AND TIMESCALES	5
5.0	IMPACT ON THE CUSC	5
6.0	ASSESSMENT AGAINST APPLICABLE CUSC OBJECTIVES	5
7.0	IMPACT ON CUSC PARTIES	6
8.0	IMPACT ON CORE INDUSTRY DOCUMENTS	6
9.0	ALTERNATIVE AMENDMENT	6
10.0	VIEWS AND REPRESENTATIONS	6
11.0	SUMMARY OF PANEL MEMBERS VIEWS	6
12.0	NATIONAL GRID RECOMMENDATION	7
13.0	COMMENTS ON DRAFT AMENDMENT REPORT	7
	ANNEX 1 - CAP087 AMENDMENT PROPOSAL (REVISIONS TO REQUEST FOR URGENCY PROCESS)	8
	ANNEX 2 – PROPOSED TEXT TO MODIFY CUSC	11
	Part A - Text to give effect to the Proposed Amendment	11
	ANNEX 3 – COPIES OF REPRESENTATIONS RECEIVED TO CONSULTATION	12
	ANNEX 4 – COPIES OF COMMENTS RECEIVED ON THE DRAFT AMENDMENT REPORT	18

1.0 SUMMARY AND RECOMMENDATION

- 1.1 CAP087 seeks to place an obligation on the CUSC Amendment Panel Chairman to consult with the Authority on all requests for urgency pertaining to CUSC Amendment Proposals. At present the Panel Chairman (or Panel Secretary if applicable) 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.
- 1.2 British Gas Trading submitted CAP087 to the April 2005 meeting of the CUSC Amendments Panel. At the meeting the Panel determined that the National Grid should initiate a period of wider industry consultation on the issues raised by CAP087.
- 1.3 The Consultation Paper for CAP087 was published by National Grid on 27th April 2005, placed on the CUSC website and copies sent to Core Industry Document Owners and CUSC Parties. Responses were invited by 1st June 2005.
- 1.4 National Grid received a total of 5 responses to the consultation for CAP087.

National Grid Recommendation

- 1.5 National Grid recommends that CAP087 should be implemented.
- 1.6 It is recommended that CUSC be modified in line with CAP087, 10 business days after the Authority's decision.

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 the current arrangements contained in the CUSC regarding requests for urgency pertaining to CUSC Amendment Proposals.
- 2.2 Further to the submission of Amendment Proposal CAP087 (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 CAP087.
- 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 also been included and a summary of the representations received is 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

- 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 (or Panel Secretary if applicable) 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 Section 8.21.3 that the proposal should be treated as an Urgent Amendment Proposal.
- 3.2 CAP087 (Annex 1) 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 if applicable) will only consult with the Authority if the Amendments Panel, or the 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.

Legal Text for CAP087

- 3.3 The legal text to give effect to CAP087 is contained in Annex 2. CAP087 and CAP085 (Revised Treatment of Housekeeping Amendments) are interactive should CAP085 be implemented before CAP087. The legal text provided with this Amendment Report reflects this.

4.0 IMPLEMENTATION AND TIMESCALES

- 4.1 There is no material impact associated with the timing of the implementation of CAP087. It is therefore proposed that implementation takes place 10 business days after the Authority's decision.

5.0 IMPACT ON THE CUSC

- 5.1 CAP087 requires amendments to Section 8 (CUSC Amendments) of the CUSC. The text required to give effect to CAP087 is contained in Annex 2 of this document.

6.0 ASSESSMENT AGAINST APPLICABLE CUSC OBJECTIVES

- 6.1 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.
- 6.2 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. CAP087 would therefore better facilitate the applicable CUSC Objectives and allow National Grid to more efficiently discharge its obligations.

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 CAP087 will not have an impact on Core Industry Documents or other industry documents. However, a comparable amendment to the Balancing and Settlement Code (BSC - P187) concerning Requests for Urgency is expected to be considered by the Authority in a similar timescale as CAP087.

9.0 ALTERNATIVE AMENDMENT

9.1 No Alternative Amendment Proposals were submitted.

10.0 VIEWS AND REPRESENTATIONS

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

View of Core Industry Document Owners

10.2 No responses to the CAP087 consultation document were received from Core Industry Document Owners.

Responses to Industry Consultations

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

Reference	Company	Supportive	Comments
CAP087-CR-01	E.ON (UK)	Yes	Supports CAP087
CAP087-CR-02	EDF Energy	Yes	Supports CAP087
CAP087-CR-03	EDF Trading Ltd and EDF (Generation)	Yes	Supports CAP087
CAP087-CR-04	Centrica	Yes	Supports CAP087
CAP087-CR-05	RWE/npower	Yes	Supports CAP087

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

11.0 SUMMARY OF PANEL MEMBERS VIEWS

11.1 The Panel considered CAP087 at its meeting on 22nd April and agreed that National Grid should proceed to industry consultation on CAP087. Members of the Amendments Panel have submitted no formal responses during the consultation period.

12.0 NATIONAL GRID RECOMMENDATION

12.1 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.

13.0 COMMENTS ON DRAFT AMENDMENT REPORT

13.1 National Grid received 2 responses following the publication of the draft Amendment Report.

13.2 One of the respondents (Centrica) had no comments on the draft Amendment Report. The other respondent (EDF Trading Ltd) was satisfied with the content of the draft report.

13.3 The following table provides an overview of each representation. Copies of the representations are attached in Annex 4.

Reference	Company	Summary of Comments
CAP087-AR-01	EDF Trading Ltd	Satisfied with the content of draft report
CAP087-AR0-2	Centrica	No comments

Annex 1 - CAP087 Amendment Proposal (Revisions to Request for Urgency Process)

CUSC Amendment Proposal Form	CAP:087
Title of Amendment Proposal:	
Revisions to Request for Urgency Process	
Description of the Proposed Amendment (mandatory by proposer):	
<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>	
Description of Issue or Defect that Proposed Amendment seeks to Address (mandatory by proposer):	
<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>	
Impact on the CUSC (this should be given where possible):	
<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>	
Impact on Core Industry Documentation (this should be given where possible):	
<p>BGT do not believe there will be any impact .</p>	
Impact on Computer Systems and Processes used by CUSC Parties (this should be given where possible):	
<p>BGT do not believe there will be any impact</p>	
Details of any Related Modifications to Other Industry Codes (where known):	
<p><i>BSC Modification P187 – Introducing the ability for a Party to request urgent status and for it to be considered by the Authority.</i></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
<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:	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.

Annex 2 – Proposed Text to modify CUSC

Part A - Text to give effect to the Proposed Amendment

Insert new paragraph 8.21.4 as follows:

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 that should apply in respect thereof.

Retain existing paragraphs 8.21.4 to 8.21.8 but renumber to 8.21.5 to 8.21.9. Amend any reference to the same in the CUSC accordingly.

Text to give affect to the Proposed Amendment if CAP085 is implement before CAP087

Insert new paragraph 8.21.1.4 as follows:

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 that should apply in respect thereof.

Retain existing paragraphs 8.21.1.4 to 8.21.1.8 but renumber to 8.21.1.5 to 8.21.1.9. Amend any reference to the same in the CUSC accordingly.

Annex 3 – Copies of Representations Received to Consultation

This Annex includes copies of any representations received following circulation of the Consultation Document (circulated on 27th April 2005, requesting comments by close of business on 1st June 2005).

Representations were received from the following parties:

No.	Company	File Number
1	E.ON UK	CAP087-CR-01
2	EDF Energy	CAP087-CR-02
3	EDF Trading Ltd and EDF (Generation)	CAP087-CR-03
4	Centrica	CAP087-CR-04
5	RWE/npower	CAP087-CR-05

Reference	CAP087-CR-01
Company	E.ON UK



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

E.ON UK plc
Westwood Way
Westwood Business Park
Coventry
CV4 8LG
eon-uk.com

Neil Smith
024 7642 4369

neil.c.smith@eon-uk.com

Friday 29th April 2005

Dear Lilian,

RE: CUSC Amendment Proposal CAP087

E.ON UK appreciates the opportunity to comment upon this CUSC Amendment Proposal. We concur with BGT that all CUSC Parties need to have confidence that requests for urgency are dealt with in a consistent manner. One way of achieving this perception amongst Parties is to ensure that recommendations are made on an equitable basis by a representative Panel. In this regard we do not consider the CUSC Panel to be deficient. In our opinion, the current CUSC election procedures guarantee a Panel which is truly reflective of the industry. It is this aspect which marks a noticeable contrast between the CUSC and BSC Panels. The shortcomings of the BSC election methodology necessarily results in a Panel which can not be considered as reflective of the industry. As such we believe that the assurances delivered by this Amendment will benefit confidence in the BSC procedures to a much greater degree than will be achieved under the CUSC.

However, despite these observations we acknowledge that the proposal by BGT would in no way hinder the consistency of the current process and whilst unconvinced of any tangible improvements upon the current situation, we are generally supportive of the principle behind this Amendment, namely the achievement of consistency between industry Codes.

If you would like to discuss any of the matters raised within our response please don't hesitate to contact me.

Yours sincerely

Neil Smith
Regulatory Analyst
Trading Arrangements
Energy Wholesale
E.ON UK plc

E.ON UK plc
Registered in
England and Wales
No 2966970
Registered Office:
Westwood Way
Westwood Business Park
Coventry CV4 8LG

Reference	CAP087-CR-02
Company	EDF Energy

Our Ref
Your CAP087

Lillian Macleod
Commercial Frameworks
NGT House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA



Date 1 June 2005

Dear Lillian,

**EDF Energy Response to CUSC Amendment Proposal CAP087 –
“Revisions to Request for Urgency Process”.**

EDF Energy are pleased to have the opportunity to comment on CUSC Amendment Proposal CAP087.

We support the proposed Amendment as we agree with the view of both NGC and the Proposer that it would be beneficial for the Authority to consider all requests for urgency. We would not expect to see an increase in frivolous requests for urgency were this Amendment Proposal to be implemented so we feel that it can only improve the overall efficiency of the Amendment process.

We also agree with NGC's view that implementation should take place ten working days after an Authority decision.

If you have any queries, please do not hesitate to contact me on 020 7752 2524.

Yours sincerely

Stephen Moore
Energy Market Strategy
EDF Energy

40 Grosvenor Place Victoria London SW1X 7EN

EDF Energy plc
Registered in England and Wales
Registered No. 2366852
Registered Office:
40 Grosvenor Place Victoria
London SW1X 7EN

www.edfenergy.com

Reference	CAP087-CR-03
Company	EDF Trading Ltd and EDF (Generation)

EDF Energy Merchants Limited

Mid-City Place
71 High Holborn
London WC1V 6ED

Tel: 44 (0) 207 0614362
Fax: 44 (0) 207 0615362

Richard Dunn
National Grid Company
NGT House
Gallows Hill,
Warwick,
CV34 6DA

23rd May 2005

Dear Richard,

CUSC Amendment Proposal CAP087 (Revisions to Request for Urgency Process)

Please find herewith, the response made on behalf of EDF Trading Ltd and EDF (Generation) to the CUSC consultation on the Amendment Proposal CAP087 on revisions to the process on requests for urgency.

We acknowledge that this amendment proposal is similar in nature to that proposed under the BSC process as P187 and for the same reasons that we believed that that modification has merit, we believe this too should be approved.

It is only Ofgem that can both agree or reject a request for urgency and as such any such requests from Parties should require immediate consultation/discussion with Ofgem in order that the latter can make that decision. It seems inappropriate that a request can be denied by the CUSC Panel, when its decision criteria can be different from that of Ofgem, whilst at the same time the CUSC Panel can not approve such a request.

The proposal will allow for a consistent approach to urgency requests and providing there is sufficient guidance given (as will be the case for P187), then the process will be more efficient and transparent. It will enable NGC to discharge its license obligations more efficiently.

Yours sincerely

Steve Drummond

UK Market Adviser to EDF Trading Ltd

Reference	CAP087-CR-04
Company	Centrica



Lilian Macleod
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.
31 May 2005

Dear Lilian,

CUSC Amendment Proposal CAP087 – Revision to Request for Urgency Process

British Gas Trading (BGT) welcomes this opportunity to comment on this Amendment Proposal. As the proposer of this Amendment Proposal BGT agrees with the initial view expressed by National Grid that this proposed change will better facilitate the Applicable CUSC Objectives.

Obligating the Panel Chairman or Panel Secretary to always make a recommendation to the Authority when a Party makes a request for urgency is better than the current baseline. Introducing this obligation will ensure that the Authority considers and makes a decision on all requests for urgent status and not a subset as is possible under the current rules. This will enhance the consistency of the decision making process and help to deliver best regulatory practice. Enabling the Authority to consider all requests for urgency will also allow the Authority to consider its wider statutory obligations rather than the Panel considering the request against the more limited Applicable CUSC objectives. This should also help to achieve best regulatory practice.

Centrica supports the proposed legal text and the proposed implementation date of 10 working days following the Authority decision.

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

Yours sincerely,

Mark Manley
Contract Manager

A *centrica* business

Centrica plc - The group includes British Gas Trading, British Gas Services and Accord Energy
Registered in England No 3033654. Registered Office: Millstream, Maidenhead Road, Windsor, Berkshire SL4 5GD

Reference	CAP087-CR-05
Company	RWE/npower

Dear Lilian,

Thank you for the opportunity to respond to the above CUSC consultation proposal. The following response is provided on behalf of the following CUSC Parties within RWE: RWE Npower plc, Npower Cogen Limited, Npower Cogen Trading Limited, Npower Direct Limited, Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited.

We are happy to support CUSC Amendment Proposal CAP087 and believe the proposal better facilitates the achievement of the Applicable CUSC Objectives because it will allow National Grid to more efficiently discharge its obligations.

If you would like to discuss our response please do not hesitate to contact me.

Yours sincerely

Louisa Stuart-Smith
Electricity Codes
Networks and Codes

Tel: 01905 340408
Mob: 07989 490710
Fax: 01905 340487
npower
Oak House
Bridgwater Road,
Warndon,
Worcester,
WR4 9FP

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

This Annex includes copies of any representations received following circulation of the Draft Amendment Report (circulated on 3rd June 2005, requesting comments by close of business on 10th June 2005).

Representations were received from the following parties:

No.	Company	File Number
1	EDF Trading Ltd	CAP087-AR-01
2	Centrica	CAP087-AR-02

Reference	CAP087-AR-01
Company	EDF Trading Ltd

From: steve.drummond@edftrading.com
[\[mailto:steve.drummond@edftrading.com\]](mailto:steve.drummond@edftrading.com)
[<mailto:\[mailto:steve.drummond@edftrading.com\]>](mailto:[mailto:steve.drummond@edftrading.com])

Sent: 07 June 2005 13:51
To: GoldIC, Industry Codes
Subject: Re: Draft Amendment Report: CAP087 (Revisions to Request for Urgency Process)



CAP087-Draft
Amendment Report .

Many thanks, this looks fine to me.

Steve

Reference	CAP087-AR-02
Company	Centrica

From: Goldring, Simon [mailto:Simon.Goldring@centrica.co.uk]
Sent: 10 June 2005 16:37
To: Dunn, Richard
Cc: MacLeod, Lilian
Subject: Re: CUSC Amendment Proposal CAP085 & 87

Richard,

Please find attached a response on behalf of Centrica in response to the Alternative Amendment Proposal for CAP085.

Please note that we have no comments on CAP087 Draft Report.

Regards
Simon