



National Grid

AMENDMENT REPORT

CUSC Proposed Amendment CAP085 - Revised Treatment of Housekeeping Amendments

The purpose of this report is to assist the Authority in their decision of whether to implement Amendment Proposal CAP085

Amendment Ref	CAP085
Issue	1.0
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Prepared by	National Grid

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

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0.2	16/6/05	National Grid	Draft for industry comment
1.0	23/6/05	National Grid	Formal version for submission to the Authority

b Document Location

Nation Grid Website:

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

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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 CAP085 was proposed by NGC and submitted to the CUSC Amendments Panel for consideration at their meeting on 22nd April 2005. The Amendments Panel determined that the issue was appropriate to proceed to wider industry consultation by National Grid.
- 1.2 Currently all Amendments that are progressed follow the same processes. In relation to Housekeeping Amendments, NGC believes that the normal Amendment processes for substantive Amendments that have a material impact on CUSC Parties is disproportionate and unnecessary and risks consultation 'overload', in an area where changes are non-contentious and have a minimal effect on parties.
- 1.3 CAP085 "Revised Treatment of Housekeeping Amendments" would significantly reduce this burden, whilst also preserving key procedural protections to ensure that CUSC Parties and the Authority have confidence in the revised procedures. However, Ofgem will continue to take the final executive decision as to whether or not to agree the proposed change, which gives the industry the added comfort of knowing that CAP085 does not in anyway dilute the Executive role of the Authority. A Consultation Alternative Amendment was submitted during the industry consultation jointly by NGC and Scottish and Southern Energy to take into account points made by the CUSC Panel and specific improvements suggested by Scottish and Southern Energy.
- 1.4 NGC would also highlight that the safe-guards contained within CAP085 and the Alternative Amendment are such that these proposals are actually more conservative than those currently in place and operating without difficulty on the UNC, where "Consent to Modify," is in place. (Where NGT is in effect allowed to bring about a Housekeeping change, essentially following the seeking of permission from the Authority.)

National Grid Recommendation

- 1.4 National Grid considers that the Consultation Alternative Amendment would further aid the efficient discharge by the licensee of the obligations imposed upon it under the Act and by the NGC Transmission Licence, and hence in NGC's view would better facilitate the Applicable CUSC Objectives. NGC proposes that the Consultation Alternative Amendment, if approved, should be implemented 10 business days after an Authority 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 for Housekeeping Amendments.
- 2.2 Further to the submission of Amendment Proposal CAP085 (see Annex 1) and the subsequent wider industry consultations that were undertaken by NGC, 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 CAP085.

- 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 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

- 3.1 CAP085 would provide for a more efficient, lighter touch approach, to the progressing of Housekeeping Amendments. It is proposed that where such proposals have been raised, the CUSC Panel will agree whether or not they believe such Amendments are in fact Housekeeping (in accordance with the new definition of "Housekeeping Amendment," in the CUSC.).
- 3.2 Where agreement has been reached with the Panel that the proposed change falls within this definition, NGC will publish the proposed Housekeeping Amendments on the CUSC Industry Information Website for 5 business days, prior to writing to Ofgem requesting that the Housekeeping Amendments be approved. The proposal will also be circulated by e-mail to all (where agreement can not be reached, the Amendment will not be treated as a Housekeeping Amendment, and will follow the normal CUSC Amendment route.)
- 3.3 The Authority will take the final executive decision as to whether or not to approve the Amendment(s) based on the normal criteria as to whether or not they believe the proposal better facilitates the relevant applicable objectives. Were the Authority to believe that Amendments that had followed the Housekeeping route were not in fact Housekeeping Amendments, it would be at the Authority's discretion as to whether they asked NGC to take the proposal back through the normal Consultation route, or rejected it, in these circumstances.
- 3.4 The proposed definition of a "Housekeeping Amendment," as set out within the proposed Legal text for CAP085 would be sufficient to encompass all previous Housekeeping Amendments to the CUSC, but is sufficiently narrow to ensure that no Amendment which could have a material impact on parties could be treated as Housekeeping.

4.0 IMPLEMENTATION AND TIMESCALES

- 4.1 NGC proposes that CAP085 or the Consultation Alternative Amendment if approved should be implemented 10 days after an Authority decision.

5.0 IMPACT ON THE CUSC

- 5.1 The text required to give effect to the Proposed Amendment and the Consultation Alternative Amendment is contained as 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. NGC proposed CAP085 and believes that it would better facilitate achievement of the Applicable CUSC Objectives. However NGC considers that the Consultation Alternative Amendment would further aid the efficient discharge by the licensee of the obligations imposed upon it under the Act and by the NGC Transmission Licence, and hence in NGC's view would better facilitate the Applicable CUSC Objectives. NGC therefore supports the Consultation Alternative Amendment as a further improvement on CAP085. NGC proposes that the Consultation Alternative Amendment, if approved, should be implemented 10 days after an Authority decision.

7.0 IMPACT ON CUSC PARTIES

- 7.1 The introduction of CAP085 or the Consultation Alternative Amendment would mean that it would be possible to progress Housekeeping Amendments in a more streamlined manner compared to normal Amendment Proposals in keeping with the more minor nature of such Amendment Proposals. This would help reduce the administrative burden on CUSC Parties to evaluate Amendment Proposals since they would not formally need to respond to consultation on Amendment Proposals.

8.0 IMPACT ON CORE INDUSTRY DOCUMENTS

- 8.1 Neither CAP085 or the Consultation Alternative Amendment will have an impact on core industry documents.

9.0 CONSULTATION ALTERNATIVE AMENDMENT

- 9.1 The Consultation Alternative Amendment Proposal is very similar in substance to the Original Amendment. However, it includes three additional elements:
- (i) should the Authority not accept that the amendment proposal was a housekeeping proposal then it could not be referred back through the normal process as in the original amendment proposal (this element proposed by National Grid);
 - (ii) the period for the proposed Housekeeping amendment to be viewed on the CUSC website should be increased to ten days (this element proposed by Scottish and Southern);
 - (iii) NGC should incorporate any comments by CUSC Parties received within the ten days into the Housekeeping Amendment Report (this element proposed by Scottish and Southern).
- 9.2 At the CUSC Panel meeting held on 22nd April 2005 Panel Members commented that CAP085 could potentially work better if the Authority did not have the opportunity to direct NGC to take the proposal back through the normal amendment process. The rationale was that the Amendments Panel and NGC considered that it was appropriate that any decision by the Panel to treat an amendment proposal as a Housekeeping Proposal should not be revisited but the amendment proposal should be reassessed in the context of its impact on the CUSC in the event of rejection by the Authority. NGC indicated in the Consultation Report that it was worth considering this suggestion further and ultimately raised a Consultation Alternative Amendment for CAP085.

- 9.3 NGC also supports the elements of the Consultation Alternative Amendment put forward by Scottish and Southern Energy since it believes that allowing ten days for CUSC Parties to consider a Housekeeping Amendment will ensure that CUSC Parties are given adequate time to satisfy themselves that the Amendment is properly a Housekeeping Amendment. National Grid also accepts the second element proposed by Scottish and Southern in the Consultation Alternative Amendment that National Grid should incorporate any comments it receives from CUSC Parties during the ten day period into the Housekeeping Amendment Report.
- 9.4 NGC confirmed with Scottish and Southern Energy (CAP085-CR-05) that the additional text to incorporate the changes requested by the respondent should also incorporate the changes envisaged by NGC, hence the composite Consultation Alternative Amendment.

10.0 VIEWS AND REPRESENTATIONS

- 10.1 This Section contains a summary of the views and representations made by consultees during the consultation periods in respect of the Proposed Amendment and the Consultation Alternative Amendment.

Views of Panel Members

- 10.2 The Panel discussed CAP085 at its meeting on 22nd April 2005 and as indicated in Section 9 of this report the Panel indicated that CAP085 could potentially work better if the Authority did not have the opportunity to direct NGC to take the proposal back through the normal amendment process. NGC agreed that this approach had merit and has incorporated this approach into the Consultation Alternative Amendment.
- 10.3 One Panel Member (Malcolm Taylor) responded to the further consultation on the Consultation Alternative Amendment (CAP085-CAAR-02) in his capacity as a Panel Member and supported it.

Responses to Consultation

- 10.4 The following table provides an overview of the representations received. Six responses were received to the original consultation report and three responses were received to the further consultation on the Consultation Alternative Amendment. Copies of the representations are attached as Annex 3.

Reference	Company	Supportive	Comments
CAP085-CR-01	e. on UK plc	Yes	Decided not to pursue issue of seeking unanimous Panel agreement.
CAP085-CR-02	EdF Energy	Yes	Raised a question regarding situations where agreement cannot be reached answered by NGC in the report.
CAP085-CR-03	Centrica	No	Unconvinced that creating a separate process for

			Housekeeping Amendments will be more efficient.
CAP085-CR-04	RWE npower	Yes	
CAP085-CR-05	Scottish and Southern Energy	Yes	Although supportive of the original Amendment Proposal prefers a Consultation Alternative Amendment.
CAP085-CR-06	EdF Trading	Yes	Would like multiple housekeeping amendment proposals to go forward to the Authority under a single amendment proposal.
CAP085-CAAR-01	Scottish and Southern Energy	Yes	Supports the Consultation Alternative Amendment.
CAP085-CAAR-02	Malcolm Taylor (Panel Member)	Yes	Supports the Consultation Alternative Amendment.
CAP085-CAAR-03	Centrica	No	Does not support the Consultation Alternative Amendment.
CAP085-CAAR-04	EdF Energy	Yes	Supports the Consultation Alternative Amendment.

10.5 NGC discussed CAP085-CR-01 with the respondent (e.on) and the suggestion that the Panel should be required to reach a unanimous solution that the Amendment Proposal was Housekeeping. NGC indicated that its view was that the CUSC Amendments Panel currently worked well to try to achieve a consensual basis where this was possible on all issues. NGC did not therefore anticipate difficulties achieving consensus on Housekeeping amendments. However, were there to be any contention NGC believes that it would be clear that the Amendment Proposal had not been agreed by the Panel to be a Housekeeping Amendment and thus could not proceed via the streamlined housekeeping process – the amendment contains a specific safeguard to this effect. In NGC's view the current legal drafting for CAP085 was therefore appropriate to achieve a consensus and the need to refer to unanimous agreement was unnecessary. The respondent confirmed that he did not wish to put forward a Consultation Alternative Amendment requiring unanimous agreement by the Panel in the light of National Grid's explanation.

10.6 The respondent in CAP085-CR-02 (EdF Energy) supported CAP085 but asked NGC to clarify the point it made in paragraph 3.2 of the consultation paper that "where agreement cannot be reached, the Amendment will not be treated as a Housekeeping Amendment and will follow the normal CUSC route". In the unlikely event that a CUSC Party believes that an Amendment Proposal which the Amendment Panel has agreed is housekeeping should not have been treated as such, and makes this view known to NGC prior to

the Amendment Report going to the Authority, NGC would either withdraw the Amendment Proposal if it agrees with the respondent or at the very least include the CUSC Party's view in the Amendment Report to the Authority. EdF Energy subsequently supported the Consultation Alternative Amendment (see CAP085-CAAR-04).

- 10.7 The respondent in CAP085-CR-03 (Centrica) did not support CAP085 since they were not convinced that creating a separate process is actually more efficient. They believed that any proposal should be subject to the three procedural protections identified in CAP085, but believed the current amendment process fulfils all these elements. Centrica believe this could be achieved, therefore, by an alteration to NGC's internal guidelines rather than an amendment to the CUSC. Centrica believed that the Consultation Alternative Amendment moved more towards its own position but this did not change its view that a change was required and so opposed the Consultation Alternative Amendment (see CAP085-CAAR-03)
- 10.8 The respondent in CAP085-CR-04 (RWE npower) supported CAP085. The respondent in CAP085-CR-5 (Scottish and Southern Energy) supported CAP085 but believed that the industry should be afforded at least ten business days to consider such changes. This would provide a little more flexibility at those periods of the year e.g. Christmas/New Year and Easter when many in the industry are on holiday and to check that such changes are indeed minor or inconsequential. Scottish and Southern also believe that CUSC Parties' representations within the 10 business days should be included in the Housekeeping Amendment Report. These two elements were subsequently incorporated into the Consultation Alternative Amendment for which the respondent confirmed support in CAP085-CAAR-01.
- 10.9 The respondent in CAP085-CR-06 (EdF Trading) supported CAP085 but did not see the need for the Authority to do anything more than approve or reject each of the proposed housekeeping changes and there did not need to be referral back to NGC as suggested. This suggestion is now part of the Consultation Alternative Amendment. EdF Trading also suggested that if at all possible the legal drafting should be such that it allows multiple housekeeping changes to go forward to the Authority under a single amendment proposal, whilst still allowing the ability for the Authority to approve or reject each element. This would avoid the problem of throwing out all the changes for the sake of one rejection or having to put forward a multitude of amendments. NGC will explore this possibility when it considers the next batch of housekeeping amendments for submission to the Authority.

11.0 SUMMARY OF PANEL MEMBERS VIEWS

- 11.1 One Panel Member (Malcolm Taylor) responded in his capacity as a Panel Member and supported the Consultation Alternative Amendment in CAP085-CAAR-03.

12.0 NATIONAL GRID RECOMMENDATION

- 12.1 National Grid recommends approval of the Consultation Alternative Amendment for CAP085 which should be implemented 10 business days after the Authority's decision.

13.0 COMMENTS ON DRAFT AMENDMENT REPORT

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

Annex 1 - Amendment Proposal Form

CUSC Amendment Proposal Form	CAP:085
<p>Title of Amendment Proposal: <i>“Revised Treatment of Housekeeping Amendments.”</i></p>	
<p>Description of the Proposed Amendment (mandatory by proposer): <i>CAP085 would provide for a more efficient, lighter touch approach, to the progressing of HouseKeeping Amendments. It is proposed that where such proposals have been raised, the CUSC Panel will agree whether or not they believe such Amendments are in fact Housekeeping.</i></p> <p><i>Where agreement has been reached with the Panel, NGC will publish the proposed Housekeeping Amendments on our Website for 5 business days, prior to writing to Ofgem requesting that the Housekeeping Amendments be approved. (Where agreement can not be reached, the Amendment will not be treated as a Housekeeping Amendment, and will follow the normal CUSC Amendment route.)</i></p> <p><i>The Authority will take the final executive decision as to whether or not to approve the Amendments based on the normal criteria as to whether or not they believe the proposal better facilitates the relevant applicable objectives. Were the Authority to believe that Amendments that had followed the Housekeeping route were not in fact Housekeeping Amendments, it would be at the Authority’s discretion as to whether they asked NGC to take the proposal back through the normal Consultation route, or rejected it, in these circumstances.</i></p> <p><i>NGC propose to further work up the definition of “Housekeeping,” for the Consultation report. However, we would envisage it would broadly encompass typos, spelling mistakes, inaccurate references, omissions to contents pages, and updates to addresses. Where an Amendment could conceivably have any genuine form of material impact on parties, it would not constitute a Housekeeping Amendment.</i></p>	
<p>Description of Issue or Defect that Proposed Amendment seeks to Address (mandatory by proposer): <i>Currently all Amendments that are progressed, follow an identical process. This involves the publication of Consultation Documents, Draft Amendment Reports and Final Amendment Reports. In relation to Housekeeping Amendments the error in question will be obvious and we believe such extensive Consultation is an unnecessary exercise on the part of NGC, and risks excessively burdening the industry with Consultation Documents.</i></p> <p><i>This proposal would significantly reduce this burden, whilst also preserving three key procedural protections. Firstly, the Panel will need to agree that Amendments should be treated as Housekeeping, which acts as an initial check that NGC are acting in an appropriate manner. Secondly, NGC will publish all proposals on our website for a week after Panel Agreement prior to sending to the Authority. CUSC parties on our mailing list will also be notified by e-mail that this material is on our Website, and again when the proposals are sent to Ofgem. This will ensure that all Signatories are fully aware as to what is being proposed. Thirdly, Ofgem will continue to take the</i></p>	

final executive decision as to whether or not to agree the proposed change, which gives the industry the added comfort of knowing that CAP085 does not in anyway dilute the Executive role of the Authority.

Impact on the CUSC *(this should be given where possible):*

A change to Section 8 will be required.

Impact on Core Industry Documentation *(this should be given where possible):*

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 *(where known):*

None

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

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. The revised treatment of Housekeeping Amendments would aid the efficient discharge by the licensee of the obligations imposed upon it under the Act and by the NGC Transmission Licence.

Details of Proposer: Organisation's Name:	NGC
<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:	<i>Ben Graff</i> NGC 01926 656312 <i>ben.graff@uk.ngrid.com</i>
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	Mark Duffield NGC 01926 656211 <i>richard.dunn@uk.ngrid.com</i>
Attachments (Yes/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
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

Amend 8.16.1 by adding after procedures "and the **Housekeeping Amendment** procedures"

Insert new heading as 8.21 "**Urgent Amendment Proposals and Housekeeping Amendments**" and reflect change in the contents page to Section 8.

Renumber existing Paragraph 8.21 as 8.21.1 and renumber Paragraphs 8.21.1 to 8.21.8 and any references to the same in the CUSC accordingly.

Insert new paragraph 8.21.2 as follows:

8.21.2 HOUSEKEEPING AMENDMENTS

8.21.2.1 Where any **CUSC Party** requests at or prior to the **Amendments Panel** meeting at which the **Amendment Proposal** is first discussed that an **Amendment Proposal** should be treated as a **Housekeeping Amendment** the **Amendments Panel** shall consider such request at that meeting.

8.21.2.2 Where the **Amendments Panel** agrees that such **Amendment Proposal** should be treated as a **Housekeeping Amendment** then the following procedures and timetable shall be followed in respect of such **Housekeeping Amendment** in place of Paragraphs 8.16.4, 8.19 and 8.20:

(a) **NGC** will as soon as practicable after the said **Amendments Panel** meeting publish the **Housekeeping Amendment** (including the proposed text to amend the **CUSC**) on the **NGC Website** for a minimum of five **Business Days** and shall notify:

(i) **CUSC Parties**; and

(ii) such other persons who may properly be considered to have an appropriate interest in it

of such publication.

(b) after the five **Business Days** **NGC** shall submit the **Housekeeping Amendment Report** to the **Authority**.

(c) When the **Housekeeping Amendment Report** is submitted to the **Authority** **NGC** shall notify:

(i) each **CUSC Party**;

(ii) each **Panel Member**; and

(ii) any person who requests to be notified

that the **Housekeeping Amendment Report** has been submitted and shall publish a copy of the **Housekeeping Amendment Report** on the **NGC Website**.

8.21.2.3 Where the **Authority** agrees that the **Amendment Proposal** is a **Housekeeping Amendment**, then, in accordance with the **Transmission Licence**, the **Authority** may approve the **Housekeeping Amendment** contained in the **Housekeeping Report** (which shall then be an **Approved Amendment** until implemented) or not approve it. Where the **Authority** does not agree that the **Amendment Proposal** is a **Housekeeping Amendment** then the **Authority** shall notify **NGC** accordingly and the **Amendment Proposal** shall be resubmitted to the next **Amendments Panel** meeting after such notification and shall be treated as a new **Amendment Proposal**.

8.21.2.4 An **Amendments Proposal** shall not be treated as a **Housekeeping Amendment** without the agreement of the **Amendments Panel**.

Amend Paragraph 8.23.1 as follows:

8.23.1 The **CUSC** shall be modified in accordance with the terms of the direction by the **Authority** relating to, or other approval by the **Authority** of, the **Proposed Amendment** or any **Alternative Amendment** contained in the relevant **Amendment Report** or **Housekeeping Amendment Report**.

Add the following definitions to Section 11:

<p><u>“Housekeeping Amendment”</u></p>	<p><u>an Amendment Proposal relating to the correction of cross referencing or paragraph numbering, corrections to tables of contents and contact details, spelling or typographical errors, the deletion or insertion of text which has previously been retained or deleted erroneously following implementation of an earlier Proposed Amendment where the Amendments Panel so agrees that the Amendment Proposal can be treated as a Housekeeping Amendment;</u></p>
<p><u>“Housekeeping Amendment Report”</u></p>	<p><u>the report submitted by NGC to the Authority in accordance with Paragraph 8.22.2.1(b);</u></p>

Amend the following definitions within Section 11 as follows:

“Approved Amendment”	as defined in Paragraphs 8.20.5 <u>and 8.21.2.3</u> ;
“Pending Amendment Proposal”	an Amendment Proposal in respect of which, at the relevant time, the Authority has not yet made a decision as to whether to direct such Proposed Amendment to be made pursuant to the Transmission Licence (whether or not an Amendment Report <u>or Housekeeping Amendment Report</u> has been submitted in respect of such Amendment Proposal);

Part B - Text to give effect to the Consultation Alternative Amendment

Amend 8.16.1 by adding after procedures "and the **Housekeeping Amendment** procedures"

Insert new heading as 8.21 “**Urgent Amendment Proposals and Housekeeping Amendments**” and reflect change in the contents page to Section 8.

Renumber existing Paragraph 8.21 as 8.21.1 and renumber Paragraphs 8.21.1 to 8.21.8 and any references to the same in the CUSC accordingly.

Insert new paragraph 8.21.2 as follows:

8.21.2 HOUSEKEEPING AMENDMENTS

8.21.2.1 Where any **CUSC Party** requests at or prior to the **Amendments Panel** meeting at which the **Amendment Proposal** is first discussed that an **Amendment Proposal** should be treated as a **Housekeeping Amendment** the **Amendments Panel** shall consider such request at that meeting.

8.21.2.2 Where the **Amendments Panel** agrees that such **Amendment Proposal** should be treated as a **Housekeeping Amendment** then the following procedures and timetable shall be followed in respect of such **Housekeeping Amendment** in place of Paragraphs 8.16.4, 8.19 and 8.20:

(a) NGC will as soon as practicable after the said **Amendments Panel** meeting publish the **Housekeeping Amendment** (including the proposed text to amend the **CUSC**) on the **NGC Website** for a minimum of ten **Business Days** and shall notify:

(i) CUSC Parties; and

(ii) such other persons who may properly be considered to have an appropriate interest in it

of such publication.

(b) after the ten **Business Days** **NGC** shall submit the **Housekeeping Amendment Report** to the **Authority**.

(c) **NGC** will include copies of (and a summary) of all written representations or objections made by consultees during the ten day period referred to in Paragraph 8.21.2.2 (a) above in the **Housekeeping Amendment Report**.

(e)(d) When the **Housekeeping Amendment Report** is submitted to the **Authority** **NGC** shall notify:

- (i) each **CUSC Party**;
- (ii) each **Panel Member**; and
- (iii) any person who requests to be notified

that the **Housekeeping Amendment Report** has been submitted and shall publish a copy of the **Housekeeping Amendment Report** on the **NGC Website**.

8.21.2.3 Where the **Authority** agrees that the **Amendment Proposal** is a **Housekeeping Amendment**, then, in accordance with the **Transmission Licence**, the **Authority** may approve the **Housekeeping Amendment** contained in the **Housekeeping Report** (which shall then be an **Approved Amendment** until implemented) or not approve it. Where the **Authority** does not agree that the **Amendment Proposal** is a **Housekeeping Amendment** then the **Authority** may not approve it and notify **NGC** accordingly.

8.21.2.4 An **Amendments Proposal** shall not be treated as a **Housekeeping Amendment** without the agreement of the **Amendments Panel**.

Amend Paragraph 8.23.1 as follows:

8.23.1 The **CUSC** shall be modified in accordance with the terms of the direction by the **Authority** relating to, or other approval by the **Authority** of, the **Proposed Amendment** or any **Alternative Amendment** contained in the relevant **Amendment Report** or **Housekeeping Amendment Report**.

Add the following definitions to Section 11:

<p><u>“Housekeeping Amendment”</u></p>	<p><u>an Amendment Proposal relating to the correction of cross referencing or paragraph numbering, corrections to tables of contents and contact details, spelling or typographical errors, the deletion or insertion of text which has previously been retained or deleted erroneously following implementation of an earlier Proposed Amendment where the Amendments Panel so agrees that the Amendment Proposal can be treated as a Housekeeping Amendment;</u></p>
<p><u>“Housekeeping Amendment Report”</u></p>	<p><u>the report submitted by NGC to the Authority in accordance with Paragraph 8.22.2.1(b);</u></p>

Amend the following definitions within Section 11 as follows:

<p>“Approved Amendment”</p>	<p>as defined in Paragraphs 8.20.5 <u>and 8.21.2.3;</u></p>
<p>“Pending Amendment Proposal”</p>	<p>an Amendment Proposal in respect of which, at the relevant time, the Authority has not yet made a decision as to whether to direct such Proposed Amendment to be made pursuant to the Transmission Licence (whether or not an Amendment Report <u>or Housekeeping Amendment Report</u> has been submitted in respect of such Amendment Proposal);</p>

Annex 3 – Copies of Representations Received to Consultations

This Annex includes copies of any representations received following circulation of the original Consultation Document and the further consultation on the Consultation Alternative Amendment.

Representations were received from the following parties:

No.	Company	File Number
1	e.on UK plc	CAP085-CR-01
2	EdF Energy	CAP085-CR-02
3	Centrica	CAP085-CR-03
4	RWE npower	CAP085-CR-04
5	Scottish and Southern Energy	CAP085-CR-05
6	EdF Trading	CAP085-CR-06
7	Scottish and Southern Energy	CAP085-CAAR-01
8	Malcolm Taylor (Panel Member)	CAP085-CAAR-02
9	Centrica	CAP085-CAAR-03
10	EdF Energy	CAP085-CAAR-04

Reference	CAP085-CR-01
Company	e.on

Richard Dunn
Commercial Frameworks
National Grid Company plc
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 Richard,

RE: CUSC Amendment Proposal CAP085

E.ON UK appreciates the opportunity to comment upon this CUSC Amendment Proposal. We are fully supportive of this attempt to reduce the bureaucracy associated with Housekeeping Amendments. We believe that it is important to ensure that Amendments fast tracked in this manner are unanimously considered as 'Housekeeping' changes. With this in mind we are reassured by the three procedural protections provided by NGC which are listed as being; Panel agreement, publication on the website and the Authority decision. However, paragraph 3.2 of the consultation document and the associated legal text fall short of requiring unanimous Panel agreement. We see no reason why the legal text should not reflect this condition, as it would provide additional assurance to CUSC Parties and would be consistent with the spirit of this modification. The legal text should ideally refer to the unanimous agreement of those Panel members available to vote.

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

E.ON UK plc
Registered in
England and Wales
No 2366970
Registered Office:
Westwood Way
Westwood Business Park
Coventry CV4 8LG

Energy Wholesale
E.ON UK plc

Reference	CAP085-CR-02
Company	EdF Energy

Our Ref
Your CAP085

Richard Dunn
Commercial Frameworks
NGT House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Date 25 May 2005

Dear Richard,

**EDF Energy Response to CUSC Amendment Proposal CAP085 –
“Revised Treatment of Housekeeping Amendments”.**

EDF Energy are pleased to have the opportunity to comment on CUSC Amendment Proposal CAP085.

We support the proposed modification as we agree with NGC's view that the existing process for Housekeeping Amendments is disproportionate and inefficient. Therefore we believe that a foreshortened process would be more efficient. Reducing the time spent dealing with Housekeeping Amendments can only be of benefit to all industry participants.

The strict definition of what does constitute a Housekeeping Amendment is appropriate because it is important that no Amendments which could have a material impact on CUSC parties are processed without full consultation. We do ask, however, that NGC clarify the point made in paragraph 3.2 of the Consultation Document, that *“Where agreement can not be reached, the Amendment will not be treated as a Housekeeping Amendment, and will follow the normal CUSC route.”* Does the view of a single CUSC party that a proposed Amendment should not be treated as a Housekeeping Amendment necessitate the normal CUSC Amendment process being used?

We also believe that, should Ofgem approve CAP085, implementation should be as soon as possible after that date so agree with NGC's proposal to implement this Amendment ten 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



taking care of the essentials

Richard Dunn
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Centrica Energy

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Tel. (01753) 431051
Fax (01753) 431150
www.centrica.com
Our Ref.
Your Ref.
25 May 2005

Reference	CAP085-CR-03
Company	Centrica

Dear Richard,

CUSC Amendment Proposal CAP085 – Revised Treatment of Housekeeping Amendments

Centrica welcomes this opportunity to comment on this Amendment Proposal. We are unclear whether this proposal will better facilitate the Applicable CUSC Objectives of improving the efficiency of the change process in respect of housekeeping changes.

Centrica recognises that there may be more efficient and effective mechanisms for handling Housekeeping Amendments than those currently adopted by NGC. However, we are not convinced that creating a separate process is actually more efficient. We agree that any proposal should be subject to the three procedural protections, namely: review by the Panel, consultation and decision by Ofgem. We therefore believe that the current Amendment process fulfils all these elements. An alteration to NGC's current practice as to the time allowed for consultation and the form of the Consultation document all appear to be possible under the existing CUSC and would meet the intent of this Proposal.

Centrica would therefore support an alteration to NGC's internal guidelines which utilises the definition of "housekeeping" as provided with this Amendment Proposal as a basis for proposing minimum consultation periods for Proposals which meet this criteria. We do not believe that this requires an Amendment to the CUSC, and therefore we do not support this Proposal.

If you have any questions regarding this response please do not hesitate to contact me on 01753 431051.

Yours sincerely,

Simon Goldring
Head of Transportation

Reference	CAP085-CR-04
Company	RWE npower

From: Stuart-Smith, Louisa [Louisa.Stuart-Smith@npower.com]
Sent: 25 May 2005 16:31
To: Dunn, Richard
Subject: CUSC Consultation Document: CAP085 - RWE npower Response

Dear Richard,

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 CAP085 and believe the proposals will provide a more effective and efficient way of progressing Housekeeping Amendments to the CUSC.

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
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Reference	CAP085-CR-05
Company	Scottish and Southern Energy

From: Garth.Graham@scottish-southern.co.uk
Sent: 23 May 2005 12:11
To: Dunn, Richard
Cc: Mo.Sukumaran@scottish-southern.co.uk
Subject: CAP085

Dear Sirs,

This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd. In relation to the consultation concerning the draft report associated with CUSC Amendment Proposal CAP085 (contained within your note of 17th May 2005), we have the following comments to make.

Subject to such housekeeping amendments in the future conforming with the proposed definition of "Housekeeping Amendment", we are broadly support of this proposed amendment.

However, in respect of paragraph 3.2 of the consultation document (and the proposed wording in 8.21.2.2 (a)) we believe that the industry should be afforded at least ten business days to consider such changes.

Generally, time is not a critical factor in considering housekeeping type changes (if it is then a 'Urgent' change could be sought). Allowing ten business days takes account of those periods of the year, such as around Christmas/New Year and Easter, when many in the industry are on holiday.

Clearly, based on the proposed definition of what a "Housekeeping Amendment" is, such changes should be (a) non contentious and (b) 'minor'/'inconsequential' in nature. However, sometime an 'inconsequential' change can have (unintended) knock-on consequences in (i) another part of the CUSC and/or (ii) another 'sister' document, such as the BSC or Grid Code. As time is not of the essence with these types of changes, allowing a few more days would ensure appropriate consideration is given to the proposed change.

In addition, and related to this, there should be a clear step (between the current proposed wording in 8.21.2.2 (b) and 8.21.2.2 (c)) to allow CUSC parties to make representation to NGT/the Authority (within the ten business days noted in 8.21.2.2 (a)) about the proposed Housekeeping change.

Finally, we noted in respect of 8.21.2.2 (c) that there appears to be two "(ii)".

Regards

Garth Graham Scottish and Southern Energy plc

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form part of a binding contractual agreement. Scottish Hydro-Electric, Southern Electric, SWALEC, S+S and SSE Power Distribution are trading names of the Scottish and Southern Energy Group.

Reference	CAP085-CR-06
Company	EdF Trading

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

23rd May 2005

Dear Richard,

CUSC Amendment Proposal CAP085 (Revised Treatment of Housekeeping Amendments)

Please find herewith, the response made on behalf of EDF Trading Ltd and EDF (Generation) to the CUSC consultation on the Amendment Proposal CAP085 on Revised Treatment of Housekeeping Amendments.

We fully agree that the current procedure for progressing housekeeping modifications through the CUSC is overly burdensome at present and that there is a need to simplify the process and thereby enable NGC to discharge its license obligations more efficiently.

The proposal to give the CUSC Panel the responsibility for agreeing whether a change is a housekeeping change or not, subsequent publication on the NGC website of any proposed change and final approval by the Authority is fully supported. However, it is our view that there is no need for the Authority to do anything more than approve or reject each of the proposed housekeeping changes, there does not need to be a referral back to NGC as suggested. These should just be rejected and if required a new proposal could come forward.

As a further suggestion and if at all possible, the legal drafting should be such that allows multiple housekeeping changes to go forward to the Authority under a single amendment proposal, whilst still allowing the ability for the Authority to approve or reject each element. This would avoid the problem of throwing out all the changes for the sake of one rejection or having to put forward a multitude of amendments.

Yours sincerely

Steve Drummond

UK Market Adviser to EDF Trading Ltd

Reference	CAP085-CAAR-01
Company	Scottish and Southern Energy

From: Garth.Graham@scottish-southern.co.uk
Sent: 02 June 2005 17:50
To: Dunn, Richard
Subject: CAP085 Alternative Amendment Proposal

Dear Sirs,

This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd. In relation to the consultation concerning the report associated with CUSC Alternative Amendment Proposal CAP085 (contained within your note of 2nd June 2005), we have the following comments to make. We welcome the three additional elements (that the Alternative Amendment has over the original proposal) namely: (i) should the Authority not accept that the amendment proposal was a housekeeping proposal then it could not be referred back through the normal process as in the original amendment proposal (this element proposed by National Grid); (ii) the period for the proposed Housekeeping amendment to be viewed on the CUSC website should be increased to ten days (this element proposed by ourselves); and (iii) NGC should incorporate any comments by CUSC Parties received within the ten days into the Housekeeping Amendment Report (this element proposed by ourselves). We believe that the CUSC Alternative Amendment Proposal CAP085 better achieves the applicable objectives compared with (i) the original CAP085 proposal and (ii) the existing CUSC and therefore we are support of this proposed (alternative) amendment.

Regards

Garth Graham

Scottish and Southern Energy plc

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Reference	CAP085-CAAR-02
Company	Malcolm Taylor (Panel Member)

From: Malcolm Taylor [MTaylor@aepuk.com]
Sent: 03 June 2005 08:49
To: GoldIC, Industry Codes; Dunn, Richard
Subject: RE: CUSC: Consultation Alternative Amendment for CAP085 (Revised Treatment of Housekeeping Amendments)

Richard,

Replying as a Panel Member, I would like to record my support for the alternative amendment. I believe the deletion of the Ofgem refer back step gives a cleaner and more efficient process without sacrificing anything in the rigour of the process. I believe the 10 days viewing and the register suggestions will also help the process to be efficient, as well as ensuring parties have appropriate time to consider the amendment proposals.

Kind Regards

Malcolm Taylor
Head of Electricity Trading
Assocn. of Electricity Producers
Switch: 02079309390; Direct: 02077471835
Mob: 07779146109

-----Original Message-----

From: GoldIC, Industry Codes [mailto:Goldic@ngtuk.com]
Sent: 02 June 2005 11:40
To: Hugh Conway; steve.drummond@edfrading.com; Graff, Ben; David Edward; David Lane; Dick Cecil; Greasley, John; Malcolm Taylor; Paul Jones; Dunn, Richard; Bob Brown; Rupert Judson; Russell Reading; Simon Goldring; Steve Drummond; Steve Phillips; Murray, Chris J
Subject: CUSC: Consultation Alternative Amendment for CAP085 (Revised Treatment of Husekeeping Amendments)

The industry consultation for CAP085 concluded on 25th May. During the consultation period a number of points were raised and arising from these National Grid has put forward a Consultation Alternative Amendment jointly with Scottish and Southern Energy.

Under the provisions of Paragraphs 8.19.6 and 8.19.2 of the CUSC, National Grid is required to consult on whether the Consultation Alternative Amendment better facilitates achievement of the Applicable CUSC Objectives than the original Amendment Proposal.

Please find attached the Consultation Alternative Amendment document which will also be available on the National Grid CUSC Website shortly. Responses to the CAP085 Consultation Alternative Amendment document should be sent to richard.dunn@ngtuk.com as detailed in the paper by close of business on Wednesday 15th June.

Richard Dunn
Commercial Frameworks
01926 656211
richard.dunn@ngtuk.com

NGT House
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taking care of the essentials

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Tel. (01753) 431051
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www.centrica.com
Our Ref.
Your Ref.
23 June 2005

Reference	CAP085-CAAR-03
Company	Centrica

Dear Richard,

CUSC Amendment Proposal CAP085 – Revised Treatment of Housekeeping Amendments – Consultation Alternative Amendments

Centrica welcomes this opportunity to comment on this Consultation Alternative Amendment Proposal. Centrica believes that this Proposal is an improvement upon the original CUSC Amendment Proposal. However, as the Alternative Amendment Proposal brings the proposed process closer to the current Amendment Process, we believe that the comments we raised in our response to the original consultation are still valid. We therefore do not believe that this Alternative Amendment is better than our suggestion that no change to CUSC is required and we therefore do not support either Original or Alternative Amendment Proposals. We would anticipate all of our comments will be reflected in the Final Amendment Report.

If you have any questions regarding this response please do not hesitate to contact me on 01753 431051.

Yours sincerely,

Simon Goldring
Head of Transportation

Reference	CAP085-CAAR-04
Company	EdF Energy

**Our
Your** CAP085

Richard Dunn
Commercial Frameworks
NGT House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Date 6 June 2005

Dear Richard,

**EDF Energy Response to CUSC Amendment Proposal CAP085 –
“Revised Treatment of Housekeeping Amendments”.**

EDF Energy are pleased to have the opportunity to comment on CUSC Alternative Amendment Proposal CAP085.

We supported the proposed modification as we agreed with NGC's view that the existing process for Housekeeping Amendments is disproportionate and inefficient. In light of the Alternative Amendment Proposal we feel that this offers a better solution than either the current baseline or the original Amendment Proposal.

In circumstances where Ofgem decides that an Amendment Proposal is not in fact a Housekeeping Amendment it is consistent with the CUSC that that Proposal is then treated as having been rejected.

The proposed extension to allow CUSC parties ten working days to review Amendments proposed as Housekeeping Amendments and to publish comments received from other CUSC parties during this period adds little to the expediency of the new process but will increase transparency for all CUSC parties.

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