

CUSC Workgroup Consultation

CMP337 & CMP338

Impact of DNO Contributions on Actual Project Costs and Expansion Factors' & New Definition of Cost Adjustment

Overview:

To allow Distribution Network Operators to contribute to the cost of new transmission assets and allow this contribution to be netted off from the Transmission Owner's actual project costs.

CMP338 introduces a new definition of "Cost Adjustment" to give effect to CMP337.

Modification process & timetable

1	• Proposal form • 16 January 2020
2	• Workgroup Consultation • 30 April 2020 - 11 May 2020
3	• Workgroup Report • 14 May 2020
4	• Code Administrator Consultation • 20 May 2020 - 26 May 2020
5	• Draft Code Modification Report • 27 May 2020
6	• Final Code Modification Report • 2 June 2020
7	• Implementation • 1 April 2024

Have 5 minutes? Read our [Executive summary](#)

Have 20 minutes? Read the full [Workgroup Consultation](#) document

Have 30 minutes? Read the full Workgroup Consultation document and annexes

Status summary: Workgroup Consultation. The Workgroup are seeking your views on the work completed to date to form the final solution(s) to the issue raised

This modification is expected to have a:
Medium impact

Distribution Network Operators, Transmission Owners, Remote Island Generators (Shetland, Western Isles and Orkney)

Governance route

This modification will be assessed by a Workgroup and Ofgem will make the decision on whether it should be implemented. On the 1 April 2020, the Authority approved that CMP337/CMP338 should be progressed as [Urgent](#).

Who can I talk to about the change?

Proposer: Rachel Kettles, SHEP-D

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How do I respond?

Send your response proforma to cusc.team@nationalgrideso.com by **9am on 11 May 2020**.

Executive Summary

CMP337 intends to make minor and mechanistic changes to sections 14.15.75 and 14.15.76 of the CUSC in order to clarify and remove ambiguity associated with interpretation of the application of the contributions in relation to “actual project costs”. These have already been agreed in principle by the Authority as reflecting the policy intent of its decision.

The changes will make clear that a Distribution Network Operator (DNO) contribution would be applied to reduce the total costs of the new transmission asset to the Transmission Owner (TO), and would be netted off from the TO’s “actual project costs” in a way which changes no aspect of transmission charging and maintains the exact pro-rating of costs between local and wider TNUoS charge elements, as is currently in place.

CMP338 seeks to implement that decision through the addition of the definition of the contribution from a DNO as a “Cost Adjustment”.

What is the issue?

“Actual project costs” at 14.15.75, used to calculate AC subsea cable and HVDC circuit expansion factors, is undefined. It is ambiguous whether it may be a value net of a DNO contribution.

What is the solution and when will it come into effect?

Proposers solution:

The Proposer seeks to:

Add reference to DNO contribution (“Cost Adjustment”) to 14.15.75 - to clarify that “actual project costs” may be a value from which a contribution has been netted off, and;

Add clarification to 14.15.76 - the pro-rating of costs under prevailing methodology is same whether a contribution has or has not been applied – to clarify no change to pro-rating.

Potential solutions:

The Workgroup reviewed analysis, to confirm that the contribution affects TNUoS charges in these new charging scenarios in transparent and non-distortive way.

Three charging scenarios for consideration:

- Local circuit recovery
- Zone 1 Wider TNUoS recovery
- New Shetland Zone Wider TNUoS recovery

Implementation date:

A decision on CMP337 and CMP338 is needed by June 2020. The modifications must be in effect by 1 April of TNUoS charging year 2024, which is expected to be the point at which the Shetland link is made available to users.

What is the impact if this change is made?

Who will it impact?

This modification may have an impact on specific Distribution Network Operators, Transmission Owners, Remote Island Generators (Shetland, Western Isles and Orkney) if and to the extent that the Authority approves a DNO contribution. Depending on the classification of the node on the relevant island (Main Integrated Transmission System MITS or local) there may be an impact on the TNUoS Generator Residual tariff. Depending also on this classification there will be a counter and corresponding impact on the Transmission Demand Residual and therefore Demand customers.

Interactions

The Workgroup acknowledged the overlap with [CMP303](#) 'Improving Local Circuit Charge Cost – Reflectivity' and [CMP320](#) 'Island MITs Radial Link Security Factor' which are with the Authority for a decision. The Workgroup agreed that although CMP337/CMP338 seeks to amend the same Sections of the CUSC as CMP303, there is no direct impact. The Workgroup agreed that if all the modifications were approved by the Authority, then the Code Administrator would need to raise a housekeeping modification to ensure the legal text is consistent with what has been approved.

Workgroup Consultation Introduction

This document is the CMP337 & CMP338 **Workgroup's Consultation**. This document outlines;

- **What is the issue?**
- **What is the solution?**
 - Proposer's solution
 - Workgroup considerations
 - Potential solutions
 - Draft legal text
- **What is the impact of this change?**
- **When will the change take place?**
- **How to respond**
- **Acronym table and reference material**

The Workgroup are seeking views on the proposed change and what they have worked on so far. The questions they are seeking answers on are embedded within the document and outlined in the [How to respond](#) section.

What is the issue?

What is the issue?

In its [decision](#) of 17 December 2019 the Authority approved the principle of a licensed DNO making a contribution to a licensed TO, which recognises the value to the DNO (and its customers) of a new transmission asset provided by that TO. Under this arrangement, the total cost of the transmission asset is not affected, but the cost is split between the customers of the relevant DNO and the TO (TNUoS) as users of the asset, according to the value that the asset brings to the DNO as a user of the asset, approved separately by the Authority.

The CUSC modification proposed by SHEPD, already agreed in principle by the Authority as set out in its decision, is required to only to make it clear that "actual project costs" may be a value net of a contribution, and to ensure that there is no impact upon the existing pro-rating of costs across local and wider TNUoS charge elements.

Why is it an issue?

The CUSC is ambiguous as to whether it recognises that "actual project costs" may be a value from which a DNO contribution has been netted off, to reflect the fact that distribution customers are making a contribution with the effect of sharing cost between two licensees as determined separately by the Authority. This contribution or "Cost Adjustment" would have the effect that customers paying TNUoS pay for the net cost of the asset. The modification seeks to provide clarity and certainty that the "actual project costs" value would, where a contribution has been approved by the Authority, be a net cost value. As the CUSC does not currently include the term or definition of "Cost Adjustment", this is addressed in CMP338.

What is the solution?

Proposer's solution:

- Add reference to DNO contribution ("Cost Adjustment") to 14.15.75 - to clarify that "actual project costs" may be a value from which a contribution has been netted off, and;
- Add clarification to 14.15.76 - the pro-rating of costs under prevailing methodology is same whether a contribution has or has not been applied – to clarify no change to existing pro-rating between cable/converter asset costs and "other" costs of the link for the purpose of calculating expansion factors.

Workgroup Considerations

The Workgroup convened three times to discuss the perceived issue, detail the scope of the proposed defect, devise potential solutions and assess the proposal in terms of the Applicable CUSC Objectives.

Potential options

The Workgroup discussed the effect of the contribution on MITs Node Charging scenarios to ensure it was transparent and non-distortive. The Workgroup looked at three different Charging scenarios

- Local Circuit Recovery
- Zone 1 Wider TNUoS recovery &
- New Zone for Shetland – wider TNUoS recovery

For the purposes of the following analysis a scenario was created using the Shetland Link project as an example. The asset costs (those of cable and converters and associated proportion of scheme overheads) were assumed to be £504million. This figure is the latest information as provided by SHET to the ESO for production of the 5-year forecast. The total cost of the link was assumed to be £700million.

The assumed contribution was £200million. As the contribution is applied to the total link cost, this was pro rata'ed between the asset costs which are used to build circuit specific expansion factors and the "other" costs which form part of the TO MAR and are recovered from the Transmission Demand Residual pot according to the prevailing TNUoS methodology. For more detail please visit the assumptions tab of the associated workbook.

Net link costs

As the proposed link is an HVDC link, actual project costs, relating to specific named assets, are used to calculate the circuit expansion factors for the purposes of TNUoS charging. The Proposer's modifications set out that the contribution is captured for purpose of TNUoS charging within the link costs at CUSC 14.15.75/76 and is targeted at connecting generators simply via a net link cost value. The Proposer intends, and is of the view, that this modification will not change the TNUoS methodology. The modification will clarify that for the purposes of calculating expansion factors for HVDC and sub-sea AC links the actual project costs used in the calculation may be net of a third-party capital contribution, and that the contribution takes effect via a net link cost value. This assumption is the same for each of the TNUoS charging scenarios.

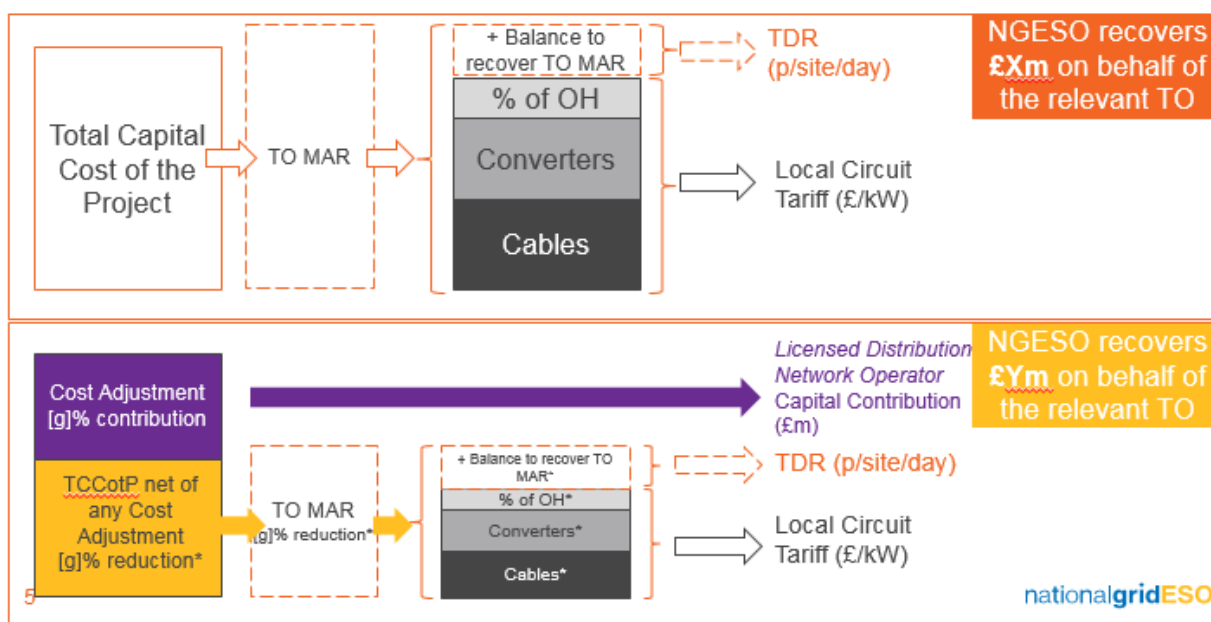
Scenario 1 - Local Circuit Recovery

NGESO provided the Workgroup with a working scenario for Local Circuit TNUoS tariffs for Charging Year 2024/25, showing the impact of a third-party capital contribution flowing through the TNUoS methodology via a net link cost value of £500m. The Workgroup considered the Local Circuit Recovery of the link costs. The workgroup agreed that the contribution effect would be transparent and non-distortive. A reduction in link costs (as a result of a third-party capital contribution or otherwise) carries through the methodology to the relevant local circuit tariffs and non-local circuit TNUoS charges (which are recovered through the Transmission Demand Residual (TDR)). The contribution does not affect the baseline charging methodology, and the numerical effects are the same where a link cost is, per the assumptions used by the workgroup, £500m net of a contribution, or £500m where no contribution has been applied.

Local Circuit Tariff (without contribution)	Local Circuit Tariff (with contribution)	Delta
£74.12/kW	£52.94/kW	-£21.18/kW

Generation - Wider Tariff Elements			Peak Security (£/kW)	Year Round Shared (£/kW)	Year Round Not Shared (£/kW)	Residual (£/kW)
Zone No.	Zone Name	Scenario				
1	North Scotland	Scenario 1 (with contribution)	1.946827	19.748612	26.103416	-9.912084
1	North Scotland	Scenario 1 (no contribution)	1.946827	19.748612	26.103416	-9.912084
Delta		Scenario 1	0.00	0.00	0.00	0.00

Revenue collection with a “Cost Adjustment”



Scenario 2 - Zone 1 Wider TNUoS recovery

NGESO provided the Workgroup with a working scenario for Zone 1 wider TNUoS tariffs for Charging Year 2024/25, showing the impact of a third-party capital contribution flowing through the TNUoS methodology via a net link cost value of £500m. This was using a Security Factor of 1.8 which is the default assumption for all wider circuits in the DCLF ICRP model. The Workgroup questioned if this could be demonstrated using a Security Factor of 1.0, on the assumption that CMP320¹ would be approved.

Generation - Wider Tariff Elements						
Zone No.	Zone Name	Scenario	Peak Security (£/kW)	Year Round Shared (£/kW)	Year Round Not Shared (£/kW)	Residual (£/kW)
1	North Scotland	Scenario 2 (with contribution)	1.946827	25.384370	32.187255	-9.660973
1	North Scotland	Scenario 2 (no contribution)	1.946827	26.810398	33.726662	-9.760031
Delta		Scenario 2	0.00	-1.43	-1.54	0.10

The Workgroup reviewed the calculations provided by the ESO, which shows the wider tariffs in Zone 1, with and without the contribution. The impact of the contribution using the agreed assumptions is to reduce the Year Round Shared and Not Shared elements of the wider tariff for Zone 1 generators.

The contribution results in cheaper locational charges, which as a result reduces the amount paid by Zone 1 generators through wider TNUoS. There are distributional effects as a result of the 838/2010 Limiting Regulation and the overall reductions in the Zone 1 wider tariffs are matched by an overall increase in the Generator Residual tariff.

In terms of the impact on demand customers, the AAHEDC tariff is recovered on a volumetric basis whereas from April 2022 the TDR will be a fixed £/site/day charge for each of the different charging bands, but broadly AAHEDC payers can be considered the same group as TDR payers. This means those who fund the contribution through the AAHEDC tariff get it all back through the Transmission Demand Residual in this scenario.

The main cost of the contribution, in this scenario, as it works through the TNUoS methodology is on GB Transmission connected generators outside of Zone 1 who see their Residual Credit made "less negative" as a direct result of the lower link cost resulting from the third party capital contribution driven by the 838/2010 Limiting Regulation.

The Workgroup discussed how the net impact on generator residual is likely to be affected by the outcome of CUSC Modifications [CMP317/CMP327](#) 'Removing Generator Residual and excluding assets required for connection' and [CMP324/CMP325](#)

¹ <https://www.nationalgrideso.com/codes/connection-and-use-system-code-cusc/modifications/island-mits-radial-link-security-factor>

'Generation Zones – changes for RIIO-T2 & re-zoning CMP324 expansion'. In particular, the result of CMP317/CMP327 may affect whether or not the cost of an island link local circuit charge is included in the calculation for compliance with regulation 838/2010, so whether a change in local circuit cost would result in a change to the generation residual. The outcome of CMP324/CMP325 may change the definition of generation charging zones, including Zone 1, which could change the scale of the generation charging base affected by changes to the wider tariff. The workgroup agreed that despite these interactions regarding the net impact on the generation residual, the implementation of these modifications are not contingent on each other.

The workgroup agreed that the contribution effect in scenario 2 would be transparent and non-distortive. The ESO agrees that this modification in itself does not change the TNUoS methodology and therefore must be equally as transparent and non-distortive as the baseline methodology. The ESO, is however, concerned that there are unintended distributive effects in this scenario (scenario 2) only. These effects are related to the actions of the TNUoS Generator Residual which increases as a direct counter to the reduction in Zone 1 tariffs. This means that some absolute benefits of the contribution specifically related to the asset components, the cables and converters, are received by demand TNUoS payers through the TDR which may be unintended.

A reduction in link costs (as a result of a third-party capital contribution or otherwise) carries through the methodology to the wider tariff elements for Zone 1 and, results in the wider locational tariffs being more cost reflective than baseline. The contribution does not change the baseline charging methodology, and the numerical effects on each tariff element are exactly the same where a link cost is, per the assumptions used by the workgroup, £500m net of a contribution, or £500m where no contribution has been applied.

Scenario 3 - New Zone for Shetland – wider TNUoS recovery

NGESO provided the Workgroup with a working scenario for a New Zone for Shetland - wider TNUoS tariffs for Charging Year 2024/25, showing the impact of a third-party capital contribution flowing through the TNUoS methodology via a net link cost value of £500m.

Generation - Wider Tariff Elements			Peak Security (£/kW)	Year Round Shared (£/kW)	Year Round Not Shared (£/kW)	Residual (£/kW)
Zone No.	Zone Name	Scenario				
0	Shetland	Scenario 3 (with contribution)	1.946827	0.000000	114.733163	-9.149113
0	Shetland	Scenario 3 (no contribution)	1.946827	0.000000	136.879649	-9.156806
Delta		Scenario 3	0.00	0.00	-22.15	0.01

The third cost recovery scenario shows the creation of a new Shetland Zone with bespoke wider tariffs. NGESO thought this would be a likely scenario, if a MITS node was on

Shetland, as there is stipulation in the CUSC to undergo an “out of price control” rezoning exercise where the nodal price difference to be greater than +/-£1.

The impact of the contribution using the agreed assumptions is to reduce the YRNS wider tariff for the Shetland Zone.

In this scenario there is only a small effect on the generator residual. In fact, the total benefit for Shetland Developers using these contribution assumptions is much greater than the impact on the residual. This means in this scenario there are almost negligible distributional effects between generator groups and the benefit is received in a reduction of the Shetland developers’ TNUoS bills.

The workgroup agreed that the contribution effect in scenario 3 would be transparent and non-distortive. A reduction in link costs (as a result of a third-party capital contribution or otherwise) carries through the methodology to the wider tariff elements and, results in the wider locational tariffs being more cost reflective than baseline. as in the other scenarios, the contribution does not affect the baseline charging methodology, and the numerical effects on each tariff element are exactly the same where a link cost is, per the assumptions used by the workgroup, £500m net of a contribution, or £500m where no contribution has been applied.

Funding for a Solution for Shetland

Typically, DNO revenue is recovered from customers connected in that DNO area, whether they be generators or demand load. Any contributions approved by the Authority towards the Orkney or Western Isles would be recovered via SHEPD North of Scotland DUoS payees.

The [BEIS decision](#), published on 13 February 2020, which came into force further to parliamentary approval on 5 March, concluded that Shetland energy solution costs should be added to the amount recovered through the existing Hydro Benefit Replacement Scheme (also known as ‘Assistance for Areas with High Distribution Costs’ or AAHEDC), which it consulted on as part of its three-yearly review of the Hydro Benefit Replacement Scheme and the Common Tariff Obligation from July to September 2019. The AAHEDC scheme exists to support areas with high distribution costs and prevent customers located there paying costs which are much higher than any similar customers in the rest of GB. At present the AAHEDC scheme applies only to the North of Scotland.

The decision means that approved Shetland energy solution costs will be recovered from all GB suppliers / consumers via the AAHEDC mechanism from April 2021, instead of being funded by North of Scotland suppliers / consumers, which has been the arrangement to date. The amount included for Shetland energy solution costs from 2021 is £27m.

If a contribution towards the transmission link is approved, the scale of the contribution costs recovered via the AAHEDC would be the same and unaffected by any of the TNUoS charging scenarios being considered by CMP 337/8 – indicatively £251m (recovered over extended timeframe). The transmission-based solution is expected to drive a reduction in SHEPD revenue recovery via the AAHEDC (compared to other Solutions for Shetland) from the 2021 value.

SHEPD's recommendation to Ofgem sets out that the transmission link-based solution for Shetland offers significant savings (indicatively £140m) compared to the best alternatives identified. If the transmission link-based solution doesn't progress, a market solution is likely to be required, and the amount to be recovered through AAHEDC can be expected to be higher than the amount associated with the contribution.

The workgroup developed a suite of tables, see Annex 4, that summarised the impacts on different parties between the three scenarios. The table's purpose of the tables is to help set out the cost impact on different stakeholders in each scenario.

Orkney and Western Isles TNUoS effects

SHEPD has made recommendations to the Authority on contributions towards the Shetland, Orkney and Western Isles transmission links. Proposed CUSC modifications 337 and 338 are intended and expected to be effective for each of these island link proposals, and it is expected that the conclusions of the effects of the contributions upon TNUoS methodology to be exactly the same in principle as for Shetland (though SHEPD has confirmed that the contribution amounts, and absolute effect on TNUoS values, are expected to be different). The Authority set out in its December 2019 decision on SHEPD's contribution proposals that it expects to separately consult on the proposed Western Isles and Orkney contributions in 2020. SHEPD is supporting this process. It can be expected that confirmation of the absolute effects of the Western Isles and Orkney contributions upon developer TNUoS would follow any positive Authority decisions on these contributions, as was the case with the Shetland process.

Draft Legal text

The draft legal text for this change can be found in Annex 5.

What is the impact of this change?

Who will it impact?

This modification will may have an impact on specific Distribution Network Operators, Transmission Owners, Remote Island Generators (Shetland, Western Isles and Orkney) if and to the extent that the Authority approves a DNO contribution.). Depending on the classification of the node on the relevant island (Main Integrated Transmission System MITS or local) there may be an impact on the TNUoS Generator Residual tariff. Depending also on this classification there will be a counter and corresponding impact on the Transmission Demand Residual and therefore Demand customers. A Workgroup member questioned if this modification would have any impact on the STC. The Proposer confirmed that there are no specific requirements to make changes to the STC or STCP's.

What are the positive impacts?

This Modification is supporting the [Authority's approved principle](#) of a licensed DNO making a contribution to a licensed TO, which recognises the value to the DNO (and its customers) of a new transmission asset provided by that TO.

Proposer's Assessment against Code Objectives**CUSC Charging objectives (CMP337 only);**

Impact of the modification on the Code objectives:	
Relevant Objective	Identified impact
(a) That compliance with the use of system charging methodology facilitates effective competition in the generation and supply of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity;	Positive
(b) That compliance with the use of system charging methodology results in charges which reflect, as far as is reasonably practicable, the costs (excluding any payments between transmission licensees which are made under and accordance with the STC) incurred by transmission licensees in their transmission businesses and which are compatible with standard licence condition C26 requirements of a connect and manage connection);	Positive
(c) That, so far as is consistent with sub-paragraphs (a) and (b), the use of system charging methodology, as far as is reasonably practicable, properly takes account of the developments in transmission licensees' transmission businesses;	Positive
(d) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency. These are defined within the National Grid Electricity Transmission plc Licence under Standard Condition C10, paragraph 1 *; and	Neutral
(e) To promote efficiency in the implementation and administration of the CUSC arrangements	Positive

CMP337 is expected to have a positive impact against CUSC Charging applicable objectives A, B,C and E.

CUSC Non-charging objectives (CMP338 only);

Relevant Objective	Identified impact
(a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;	None

(b) Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;	None
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and	None
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	Positive
*Objective (c) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).	

CMP338 is expected to have a positive impact against CUSC applicable objective D.

Standard Workgroup Consultation question: Do you believe that CMP337 Original proposal better facilitates the Applicable CUSC Charging Objectives?

Standard Workgroup Consultation question: Do you believe that CMP338 Original proposal better facilitates the Applicable CUSC Non – Charging Objectives?

When will this change take place?

Implementation date:

A decision on CMP337 and CMP338 is needed by June 2020. The modifications must be in effect by 1 April of TNUoS charging year 2024, which is expected to be the point at which the Shetland link is made available to users.

Implementation approach:

It is critical that the modification is made in timely manner in order to ensure that consumer savings and benefits are realised, which in the case of Shetland is anticipated to deliver savings to consumers of c.£140m. Finalisation of this CUSC modification is a prerequisite for developer commitment to the Shetland transmission link, which, in turn, is a prerequisite for the link's approval.

Standard Workgroup Consultation question: Do you support the implementation approach?

How to respond

Standard Workgroup Consultation questions:

1. Do you believe that CMP337/338 Original proposal better facilitates the Applicable CUSC Objectives?
2. Do you support the proposed implementation approach?
3. Do you have any other comments?
4. Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider?

The Workgroup is seeking the views of CUSC Users and other interested parties in relation to the issues noted in this document and specifically in response to the questions above.

Please send your response to cusc.team@nationalgrideso.com using the response proforma which can be found on the National Grid ESO website via the following link: <https://www.nationalgrideso.com/industry-information/codes/connection-and-use-system-code-cusc-old/modifications/cmp337-impact-dno>

<https://www.nationalgrideso.com/industry-information/codes/connection-and-use-system-code-cusc-old/modifications/cmp338-impact-dno>

In accordance with Governance Rules if you wish to raise a Workgroup Consultation Alternative Request please fill in the form that can be located at the following link or get in contact with us via email at cusc.team@nationalgrideso.com

<https://www.nationalgrideso.com/codes/connection-and-use-system-code-cusc>

If you wish to submit a confidential response, please note that information provided in response to this consultation will be published on National Grid ESO's website unless the response is clearly marked "Private & Confidential", we will contact you to establish the extent of the confidentiality. A response marked "Private & Confidential" will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the CUSC Modifications Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response. Please note an automatic confidentiality disclaimer generated by your IT System will not in itself, mean that your response is treated as if it had been marked "Private and Confidential".

Acronym table and reference material

Acronym	Meaning
AAHEDC	Assistance for Areas with High Distribution Costs
CMP	CUSC Modification Proposal
CUSC	Connection Use of System Code
DNO	Distribution Network Operators
MITS	Main Interconnected Transmission System
HBRS	Hydro Benefit Replacement Scheme
NGESO	National Grid Electricity System Operator

STC	System Operator Transmission Owner Code
STCP	System Operator Transmission Owner Procedures
TDR	Transmission Demand Residual
TNUoS	Transmission Network Use of System
TO	Transmission Owners

Reference material:

1. [Decision – 17 December 2019 Authority Decision – 17 December 2019](#)
2. [CMP303 'Improving Local Circuit Charge Cost – Reflectivity](#)
3. [CMP320 'Island MITs Radial Link Security Factor](#)
4. [CMP317/CMP327 'Removing Generator Residual and excluding assets required for connection'](#)
5. [CMP324/CMP325 'Generation Zones – changes for RIIO-T2 & re-zoning CMP324 expansion'](#)
6. [BEIS decision - 13 February 2020](#)
7. [Authority decision on urgency, April 2020](#)
8. [Authority consultation minded to approved Shetland transmission link, April 2020](#)

Annexes

Annex	Information
Annex 1	CMP337 & CMP338 Proposal Forms
Annex 2	Terms of Reference
Annex 3	Urgency Letters for CMP337 & CMP338
Annex 4	Scenario Analysis
Annex 5	Legal Text