

CUSC Modification Proposal Form	CMP191
<p>Title of the CUSC Modification Proposal: <i>(mandatory by Proposer)</i> NETSO Consultation in relation to any potential changes to the CUSC which takes place in forums other than the CUSC Modifications Panel</p>	
<p>Submission Date <i>(mandatory by Proposer)</i> 14th February 2011</p>	
<p>Description of the CUSC Modification Proposal <i>(mandatory by Proposer)</i></p> <p>This Modification Proposal proposes that a revision to the CUSC is required to ensure that signatories to the CUSC are consulted with, via the CUSC Modifications Panel, and have their views considered in relation to any potential changes to the CUSC which may occur as a result of activity or discussion which takes place in forums other than the CUSC Modifications Panel and its associated (CUSC) groups. In particular, any input and potential or likely changes in relation to the development of the European Network Codes, in which National Grid (NGET) participate under their remit as the National Electricity Transmission System Operator (NETSO) are to be included.</p> <p>This change proposes that, in order to:-</p> <ul style="list-style-type: none"> a) Satisfy National Grid's obligation under condition C10 of their Electricity Transmission Licence; b) Maintain the existing high standards of openness and transparency in the GB code revision process; and c) Ensure that, as NETSO, National Grid adequately and effectively consider the views of the stakeholders who fund them; <p>that National Grid are to be obliged, with this Modification Proposal, to:-</p> <ul style="list-style-type: none"> 1) Provide the CUSC Modifications Panel with details of any drafting proposals, in particular those concerning European Network Codes, ahead of their submission to the relevant body (e.g. ENTSO-e), including draft text and impact assessments as appropriate; 2) Seek and take into consideration the views of the CUSC Modifications Panel on such drafting proposals ahead of their submission to the relevant body (e.g. ENTSO-e); and, 3) Provide the CUSC Modifications Panel with prior notification of and subsequent feedback from meetings and workshops at which NGET have attended as NETSO, particularly with regard to development of the European Network Codes. <p>The CUSC Modification Panel may choose to establish a Standing Group; in accordance with Section 8.21 of the CUSC; to carry out the items assigned to the Panel in (1), (2) and (3) and the CUSC Modification Panel and / or a Standing Group (if established by the Panel) may consult CUSC signatories and others for their views on matters arising from or in related to (1), (2) and (3).</p>	
<p>Description of Issue or Defect that CUSC Modification Proposal seeks to Address: <i>(mandatory by Proposer)</i></p> <p>As a result of the European Third Energy Package, the European Network of Transmission System Operators - Electricity (ENTSO-e) have been tasked with creating European Network Codes based on Framework Guidelines provided by the Agency for the Cooperation of Energy Regulators (ACER). The codes will cover a wide range of topics from Grid Connection to Wholesale Market Governance and each resulting code will directly supersede domestic network codes in each of the 27 (EU) Member States, including the United Kingdom of Great Britain and Northern Ireland.</p> <p>It is clear that the outcome of the European Network Codes could have a significant impact on national codes and changes will certainly be required to the CUSC. NGET participate in the ENTSO-e at both committee and working level. They are actively involved in the drafting process for the</p>	

European Network Codes. At a workshop on 31st January 2011, NGET confirmed that its attendance at ENTSO-e, and associated input to the drafting of the European Network Codes, was under its remit as NETSO. NGET also confirmed, at the workshop, that it did not intend to participate in GB specific stakeholder engagement relating to the European Network Codes.

NGET have a licence obligation, relating to the CUSC, to bring changes to the CUSC to the attention of CUSC parties and such other persons as may properly be considered to have an appropriate interest in it (including consumer representatives). The relevant section from the Electricity Transmission Licence is Condition 10 including, for example, paragraph 6 (see Attachment 1 for extract).

It is clear that the European Network Codes are likely to impose changes on the CUSC which will represent significant materiality to many "CUSC users and such other persons and bodies as the CUSC may provide". Given that NGET are actively involved in these changes at European level, it is appropriate that they are required to consult with GB stakeholders during the process.

It is not appropriate that NGET as NETSO, whose participation in the ENTSO-e is effectively funded by stakeholders, should be under no obligation to consult with and engage with those (funding) stakeholders. This is contrary to what industry participants have come to expect in GB and goes against the transparency model that Ofgem are working to achieve.

This Modification Proposal seeks to address this deficiency in the process and improve the openness and transparency of the GB input to the European Network Codes. It encourages effective engagement between the NETSO and GB stakeholders in relation to changes to the CUSC and ensures that those stakeholders who are liable to be materially affected by such changes have the opportunity to be heard via the CUSC Modification Panel (and any Standing Group, if established, and consultation(s), if undertaken, by the Panel and / or Standing Group).

This Modification Proposal also seeks to address the issue raised, at the 31st January workshop, by National Grid, in respect of the development of the European Network Codes, namely that (i) input is required from all stakeholders at an early stage; (ii) it is vital that any stakeholder concerns are understood at an early stage and (iii) stakeholders engagement will be crucial in helping produce coherent and viable European Network Codes.

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

Changes to Sections 8 and 11 are envisaged.

Do you believe the CUSC Modification Proposal will have a material impact on Greenhouse Gas Emissions? Yes/No (*assessed in accordance with Authority Guidance – see guidance notes for website link*)

No.

Impact on Core Industry Documentation. Please tick the relevant boxes and provide any supporting information (*this should be given where possible*)

BSC

Grid Code

STC

Other
(*please specify*)

Whilst this Modification Proposal is related specifically to the CUSC, the Proposer notes that a paper has been submitted to the Grid Code Review Panel meeting in February 2011; entitled "Grid Code Signatories Consultation" which seeks a similar change, to this CUSC Modification Proposal, to the Grid Code. In addition the Proposer is considering raising a similar change proposal, to this CUSC

Modification Proposal, to the BSC.
Urgency Recommended: Yes / No (optional by Proposer) No
Justification for Urgency Recommendation (mandatory by Proposer if recommending progression as an Urgent Modification Proposal) N/A
Self-Governance Recommended: Yes / No (mandatory by Proposer) No
Justification for Self-Governance Recommendation (Mandatory by Proposer if recommending progression as Self-governance Modification Proposal) N/A
Should this CUSC Modification Proposal be considered exempt from any ongoing Significant Code Reviews? (Mandatory by Proposer in order to assist the Panel in deciding whether a Modification Proposal should undergo a SCR Suitability Assessment) Yes. We are not aware of any ongoing SCR that relates to this Modification Proposal.
Impact on Computer Systems and Processes used by CUSC Parties: (this should be given where possible) No material impact on computer systems and processes used by CUSC Parties is envisaged as a result of this Modification Proposal.
Details of any Related Modification to Other Industry Codes (where known): As outlined above, the Proposer notes that a paper has been submitted to the Grid Code Review Panel meeting in February 2011; entitled "Grid Code Signatories Consultation" which seeks a similar change, to this CUSC Modification Proposal, to the Grid Code. In addition the Proposer is considering raising a similar change proposal, to this CUSC Modification Proposal, to the BSC.
Justification for CUSC Modification Proposal with Reference to Applicable CUSC Objectives: (mandatory by proposer) Please tick the relevant boxes and provide justification: <input checked="" type="checkbox"/> (a) the efficient discharge by The Company of the obligations imposed upon it by the Act and the Transmission Licence This Modification Proposal will ensure that The Company better satisfies its obligation under condition C10 of their Electricity Transmission Licence. <input checked="" type="checkbox"/> (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. This Modification Proposal will ensure that The Company maintain the existing high standards of openness and transparency in the GB code revision process and ensure that, as NETSO, National Grid adequately and effectively consider the views of the stakeholders who fund them. It will also ensure that CUSC Parties (and others) have greater certainty, with regard to the development of the European Network Codes, as it will involve a clear direction to National Grid to (i) provide details of any drafting proposals; (ii) seek and take into consideration views received; and (iii) provide prior notification of and subsequent feedback from meetings and workshops.

Without this Modification Proposal there would be a detrimental impact surrounding the potential uncertainty about what the changes to the European Network Codes means from the perspective of the CUSC and this would hinder competition and create a possible barrier to entry, with a particular impact on small parties.

In addition, this uncertainty about what the changes to the European Network Codes means, from the perspective of the CUSC, can be detrimental to competition, particularly where a greater perception of risk leads to increased costs.

Furthermore, this Modification Proposal better facilitates competition as it introduces an efficient and transparent process in the CUSC with respect to the European Network Codes.

Details of Proposer: (Organisation Name)	SSE Generation Ltd
Capacity in which the CUSC Modification Proposal is being proposed: (i.e. CUSC Party, BSC Party or "National Consumer Council")	CUSC Party
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	Garth Graham SSE 01738 456000 garth.graham@sse.com
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	Lisa Waters Waters Wye Associates 020 8286 8677 lisa@waterswye.co.uk
Attachments (Yes/No): Yes If Yes, Title and No. of pages of each Attachment: Transmission Licence Standard Conditions – consolidated 11th August 2010, four pages.	

Attachment 1

Transmission Licence Standard Condition C10 – as per Mark Cox notice 5th July 2010

6. The licensee shall establish and operate procedures for the modification of the CUSC (including procedures for modification of the modification procedures themselves), so as to better facilitate achievement of the applicable CUSC objectives, which procedures shall provide (without prejudice to the transition modification provisions and the procedures for modification provided for at paragraph 7 below):

a. subject to paragraphs 6A and 6B, for proposals for modification of:

(i) the CUSC (other than in respect of proposals for modification of the charging methodologies) to be made by the licensee, CUSC users, and such other persons and bodies as the CUSC may provide; and

(ii) the charging methodologies to be made by the licensee and/or CUSC users, the National Consumer Council, BSC parties and/or a materially affected party and in accordance with the provisions of the CUSC unless otherwise permitted by the Authority;

aa. for proposals for modification of the CUSC to be made by the licensee in accordance with a direction issued by the Authority pursuant to paragraphs 6C (the "significant code review route") and 14;

ab. for the implementation of modification proposals without the Authority's approval in accordance with paragraph 13A (the "self-governance route") and 13C;

ac. for the provision by the code administrator of assistance insofar as is reasonably practicable and on reasonable request to parties, (including, in particular, small participants and consumer representatives) that request the code administrator's assistance in relation to the CUSC including, but not limited to, assistance with:

(i) drafting a modification proposal;

(ii) understanding the operation of the CUSC;

(iii) their involvement in, and representation during, the modification procedure processes (including but not limited to panel, and/or workgroup meetings) as required by this condition, specified in the CUSC, or described in the Code of Practice; and

(iv) accessing information relating to modification proposals and/or modifications; and

ad. for:

(i) the regular convening of the charging methodology forum for the purposes of discussing further development of the charging methodologies;

(ii) for the provision of information by the licensee in accordance with paragraphs 9 and 10 of standard condition C4 (Charges for use of system) and paragraphs 13 and 14 of standard condition C6 (Connection charging methodology); and

(iii) insofar as reasonably practicable, the provision by the licensee of such other information or assistance as a materially affected party may reasonably request for the purposes of preparing a proposal to modify a charging methodology;

b. where such a proposal is made in accordance with paragraphs 6(a), 6(aa) and, unless otherwise directed by the Authority, 6(ab),

(i) for bringing the proposal to the attention of CUSC parties and such other persons as may properly be considered to have an appropriate interest in it (including consumer representatives);

(ii) for proper consideration of any representations on the proposal (including representations made by small participants and consumer representatives);

(iiA) for properly evaluating the suitability of the significant code review or self-governance route for a particular modification proposal;

(iii) for properly evaluating whether the proposed modification would better facilitate achieving the applicable CUSC objectives, provided that so far as any such evaluation requires information which is not generally available concerning the licensee or the national electricity transmission system, such evaluation shall be made on the basis of the licensee's proper assessment (which the licensee shall make available for these purposes) of the effect of the proposed modification on the matters referred to in paragraphs 1(a) and (b);

(iv) for the development and consideration of any alternative modification which may, as compared with the proposed modification, better facilitate achieving the applicable CUSC objective(s), provided that:

- the alternative proposal is made as described in the Code of Practice and as further specified in the CUSC; and

- unless an extension of time has been approved by the panel and not objected to by the Authority after receiving notice, any workgroup stage shall last for a maximum period (to be as specified in the CUSC) from the date on which the original modification was proposed,

(ivA) in relation to proposals for the modification of charging methodologies, for compliance (as applicable) with:

- paragraph 5 of standard condition C4 (Charges for use of system);

and

- paragraph 4 and 10(b) of standard condition C6 (Connection charging methodology).

(ivB) for the evaluation required under paragraph 6(b)(iii) (and, if applicable, paragraph 6(b)(iv)) in respect of the applicable CUSC objective(s) to include, where that impact is likely to be material, an assessment of the quantifiable impact of the proposal on greenhouse gas emissions to be conducted in accordance with such guidance (on the treatment of carbon costs and evaluation of the greenhouse gas emissions) as may be issued by the Authority from time to time;

(v) for the preparation of a panel report:

– setting out the proposed modification and, separately, any alternatives;

– evaluating the proposed modification and, separately, any alternatives;

– assessing the extent to which the proposed modification or any alternative would better facilitate achieving the applicable CUSC objectives and providing a detailed explanation of the panel's reasons for that assessment (such assessment to include, where applicable, an assessment of the quantifiable impact of the proposal on greenhouse gas emissions in accordance with paragraph 6(b)(ivB));

– assessing the impact of the modification and any alternative on the core industry documents and the changes expected to be required to such documents as a consequence of such modification;

– setting out a timetable for implementation of the modification and any alternative, including the date with effect from which such modification and any alternative (if made) is to would take effect;

and

(vi) subject to paragraph 6(b)(ivA), for the submission of the report to the Authority as soon after the proposal is made as is appropriate (taking into account the complexity, importance and urgency of the modification and in accordance with the time periods specified in the CUSC, which shall not be extended unless approved by the panel and not objected to by the Authority after receiving notice) for the proper execution and completion of the steps in sub-paragraphs (i) to (v); and

(vii) subject to paragraph 6(b)(ivA), for the revision and re-submission of the panel report provided under sub-paragraphs (v) and (vi), such resubmission to be made, if required by a direction issued by the Authority under paragraph 7(aa), as soon after the Authority's direction as is appropriate (taking into account the complexity, importance and urgency of the modification);

c. subject to paragraph 6(b)(ivA) and without prejudice to paragraph 3 of standard condition C4 (Charges for use of system), for the timetable (referred to in sub-paragraph (b)(v)) for implementation of any modification to be such as will enable the modification to take effect as soon as practicable after the Authority has directed or, in the case of a proposal falling under paragraphs 6(ab) and 13A, the panel, has determined that such modification to should be made, account being taken of the complexity, importance and urgency of the modification, and for that timetable to be extended with the consent of or as required by the Authority; and

d. for each of the procedural steps outlined in this paragraph 6, to the extent that they are relevant, to be consistent with the principles contained in the Code of Practice.

6A. The procedures for the modification of the CUSC shall provide that proposals for modification of the CUSC falling within the scope of a significant code review may not be made by the parties listed in paragraph 6(a) during the significant code review phase, except where:

a. the Authority determines that the modification proposal may be made, having taken into account (among other things) the urgency of the subject matter of the proposal; or

b. the modification proposal is made by the licensee in accordance with paragraphs 6(aa) and 6C.

6B. The procedures for the modification of the CUSC shall provide that where a modification proposal is made during the significant code review phase, unless otherwise exempted by the Authority, the panel shall:

a. comply with the steps in paragraph 6(b) subject to sub-paragraph (c) of this paragraph; and

b. as soon as practicable notify the Authority of:

(i) any representations received in relation to the suitability of the significant code review route; and

(ii) the panel's assessment of whether the proposal falls within the scope of a significant code review and the applicability of the exceptions under paragraph 6A(a) or (b), and its reasons for that assessment; and

c. not proceed with the modification proposal at the Authority's direction.

6C. The procedures for the modification of the CUSC shall provide that if within twenty eight (28) days after the Authority has published its significant code review conclusions, the Authority issues to the licensee:

a. directions, the licensee shall comply with those directions;

b. a statement that no directions under sub-paragraph (a) will be issued in relation to the CUSC, the licensee shall treat the significant code review phase as ended;

c. neither directions under sub-paragraph (a), or a statement under subparagraph (b), the significant code review phase will be deemed to have ended.

The Authority's published conclusions and directions to the licensee shall not fetter the voting rights of the members of the panel or the recommendation procedures informing the report described at paragraph 6(b)(v).

[end]

Guidance notes on completing the Modification Proposal Form:

These guidelines are to assist Proposers when completing a CUSC Modification Proposal Form.

The form seeks to ascertain details about the Modification Proposal so that the CUSC Modifications Panel can determine more clearly whether the proposal should be considered by a Work 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. Please ensure you have completed the fields marked 'mandatory' as your form could otherwise be rejected in accordance with CUSC Section 8. If you need any guidance please contact the Code Administrator at cusc.team@uk.ngrid.com or the Panel Secretary on 01926 653534. If the Panel Secretary accepts the Modification Proposal form as complete, he will write back to the Proposer informing him of the reference number for the Modification 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:

Steve Lam
Commercial
National Grid Electricity Transmission plc
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA
Or via e-mail to: Steven.Lam@uk.ngrid.com

(Participants submitting the 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 Modifications Panel, a Proposer which is not a CUSC Party shall grant a licence in accordance with Paragraph 8.16.9 of the CUSC. A Proposer that is a CUSC Party shall be deemed to have granted this Licence).

This document states what should be completed in each section of the Form and by whom, and whether it is mandatory or optional. It also provides guidance on the type of information that should be considered when completing the form. If you require further assistance please contact the Panel Secretary.

CMP###

- This is the unique reference number allocated to each individual CUSC Modification Proposal and is completed by the Panel Secretary.

Title of the Modification Proposal

- This is a mandatory section, which must be completed by the Proposer. The title of the Modification needs to be relevant to the detail and unique.

Handy Hints

- 👉 *Ensure the title is not too long*
- 👉 *Ensure it clearly identifies the Modification and the issue being raised*
- 👉 *Ensure the title cannot be confused with previous Modifications*

Submission Date

- This is a mandatory section which must be completed by the Proposer. It is the date on which the Proposer raised the Modification Proposal.

Description of the CUSC Modification Proposal

- This is a mandatory section to be completed by the Proposer and should include a detailed description of the CUSC Modification Proposal to ensure the nature and purpose of the Modification is clear to other CUSC Parties and the Industry.

Description of issue or defect that the CUSC Modification Proposal seeks to address

- This is a mandatory field to be completed by the Proposer and should provide a description of the issue or defect in sufficient detail to ensure that it is clear to CUSC Parties and the Industry.
- When completing the sections for the ***Description of the CUSC Modification Proposal*** and the ***Description of the issue or defect***, the Proposer should consider the following:
 - Background information and the circumstances surrounding the Modification
 - Direct and indirect consequences of implementing or not implementing the Proposal
 - Identification of external drivers, e.g. legislation, Ofgem documents and work (i.e. best practice guidelines) and DECC documents
 - Technical aspects of the proposed change.
 - Scenarios or examples to highlight the issue or defect
 - Linkages to previous modifications or Ofgem decisions that have been approved or rejected, stating the reasons for the linkage and why this Modification is required in relation to the previous modification
 - Identify any issues which may have an impact on Security of Supply

Handy Hints

- 👉 *Ensure you use clear and plain language*
- 👉 *Ensure the description of the proposal and the issue/defect can be understood by parties outside the field of expertise*
- 👉 *Avoid the use of jargon and acronyms without a clear explanation*
- 👉 *Where necessary, use glossaries in an attachment*
- 👉 *Ensure What, Why, Benefits and Impact have been addressed*
- 👉 *Look at previous documents such as the Modification Proposal Forms etc on the website for ideas and expectation of required length*

Impact on the CUSC

- This is an optional section of the Modification Proposal Form, which should be completed where possible. The Proposer should provide an indication of the sections and clauses of the CUSC that would require modification. If this is not possible, the Proposer should aim to indicate the general areas that may be affected.
- In addition, the Proposer should aim to provide an overview of the nature of the modifications(s) and its effects.
- The Proposer should consider:
 - Impact on relevant code section
 - New definitions within section 11
 - Amend definitions within section 11
 - Impact on Related Agreements – Bilateral, Construction and Mandatory Agreements
 - Impact on Exhibits

Handy Hints

- 👉 *If you are unsure about the relevant CUSC Section/Clause contact the Code Administrator for further assistance*
- 👉 *Look at previous documents such as the Modification Proposal Forms on the website*

Do you believe the CUSC Modification Proposal will have a material impact on Greenhouse Gas Emissions? Yes/No (assessed in accordance with Authority Guidance, available on the Ofgem website at the following link:
<http://www.ofgem.gov.uk/Pages/MoreInformation.aspx?docid=196&refer=Licensing/IndCodes/Governance>

- This section requires the proposer to include their view as to whether they believe that their Proposal has a quantifiable impact on greenhouse gas emissions, where the impact is likely to be material and, if so, what they believe that impact to be. This assessment should be conducted in accordance with the latest guidance on the treatment of carbon costs and evaluation of the greenhouse gas emissions issued by the Authority which is available at the link provided above.

Impact on Core Industry Documentation

- This is an optional section of the form, which should be completed where possible by the Proposer. It should include a list of any Codes or Industry Documents that the Modification Proposal may affect. Where possible the Proposer should provide brief details of how each document will be affected
- The Proposer should consider impacts upon:
 - Balancing and Settlement Code (BSC)
 - Grid Code
 - System Operator and Transmission Owner Code (STC)
 - Any other codes or relevant documents
- If known, identify the affected Sections and Clauses of the document. If this is not possible, the Proposer should aim to indicate the general areas.

Urgency Recommended

- This is an optional section where the Proposer can indicate if they are recommending that the progression of their Modification Proposal should be Urgent.

Justification for Urgency Recommendation

- This is mandatory if recommending progression as an Urgent Modification Proposal. The Proposer should describe here why the Modification should be treated as Urgent. This description will then be considered by the CUSC Panel as part of its recommendation to the Authority regarding urgency, and then by the Authority in determining whether urgency shall be granted. When completing this section the Proposer may wish to consider the following:
- The Authority has previously expressed the view that a Modification Proposal should only be treated as an Urgent Modification Proposal if it could not appropriately be treated as non-urgent. In addition, the Authority has expressed the view that Urgent Modification Proposals are likely to exhibit at least one of the following characteristics:
 - a) There is a very real likelihood of significant commercial impact upon the Transmission Company, industry parties, or customers if a Modification Proposal is not urgent;
 - b) Safety and security of the network is likely to be impacted if an Modification Proposal is not urgent; and/or
 - c) The Modification Proposal is linked to an imminent date-related event.

Please note that the above notes represent guidance only and are not definitive criteria. There may therefore be occasions where a Modification Proposal is deemed to be urgent by the

Authority where it does not exhibit these characteristics (or, conversely, be deemed non-urgent where one or more of the characteristics is exhibited). If urgency is not being recommended, this item on the CMP Form should be left blank.

Self-Governance Recommended

- This is mandatory by the Proposer and should be completed where the Proposer is recommending that the Modification Proposal should be progressed as a Self-governance Modification Proposal.

Justification for Self-Governance Recommendation

- This is a mandatory section if the Proposer is recommending progression as a Self-governance Modification Proposal. A Modification Proposal may be considered Self-governance where it is unlikely to have a material effect on:
 - Existing or future electricity customers;
 - Competition in generation or supply;
 - The operation of the transmission system;
 - Security of Supply;
 - Governance of the CUSC

And it is unlikely to discriminate against different classes of CUSC Parties

Self-governance Modification Proposals do not require an Authority decision due to their non-material nature. Instead, the CUSC Panel will make a decision on whether to approve or reject the Modification Proposal. In order to make a decision, the CUSC Panel must first submit a Self-governance Statement to the Authority, along with industry consultation responses at least 7 days before a Panel decision. The Authority may veto Self-governance at any point up until the Panel decision. The Authority may also declare a Modification Proposal as Self-governance without the need for a Self-governance Statement.

If the Proposer believes that the Modification Proposal is Self-governance, they should outline their justification having regard to the criteria as defined above. The Panel will take account of the Proposer's justification when deciding whether to submit a Self-governance Statement.

Should this Modification Proposal be considered exempt from any ongoing Significant Code Reviews?

- The Significant Code Review (SCR) process was implemented on 30 December 2010.
- The period between the SCR commencing and SCR closing is known as the 'SCR Phase'. During an SCR Phase, all new Modification Proposals would still be progressed but could be subsumed by the Authority into an ongoing SCR at any time.
- During an ongoing SCR Phase the originator should use this section to justify why their Modification Proposal should be considered exempt from the ongoing SCR (s). Details of ongoing SCRs can be found on the Ofgem website.

Impact on Computer Systems and Processes used by CUSC Parties

- This is an optional section of the form that should be completed where possible by the Proposer. It should include an initial list of any relevant Computer Systems and Computer Processes that may be affected by the Modification Proposal. Where possible the Proposer should provide brief details of how each System and/or Process may be affected.

Handy Hints

- ☞ *If possible, provide attachments with process flow diagrams explaining the current and new process*

Details of any Related Modifications to Other Industry Codes

- This is an optional section of the Modification Proposal Form, which should be completed where possible when there are any simultaneous modifications being proposed to other Industry Documents and Codes. It should include a list of any modifications with the reference number and title.

Justification for CUSC Modification Proposal with reference to the Applicable CUSC Objectives

- This is a mandatory field where the Proposer must describe how the CUSC Modification Proposal would better facilitate the achievement of the Applicable CUSC objectives compared with the current baseline.
- The Proposer should apply the issue or defect and the proposed solution to one or both of the Applicable Objectives and clearly identify how the proposal will aid the achievement the objectives.

Handy Hints

- 👉 *Clearly state how the Modification will benefit CUSC parties/Industry in relation to the Objectives*
- 👉 *Look at previous documents such as Ofgem decisions, Modification form etc on the website for ideas*