

CMP191 NETSO Consultation in relation to any potential changes to the CUSC which takes place in forums other than the CUSC Modifications Panel

nationalgrid
THE POWER OF ACTION



CUSC Modifications Panel, 30th September 2011
Alex Thomason – Code Administrator

CMP191

- Raised by SSE on 14th February 2011
- BSC Modification P271 and Grid Code Panel Paper also raised
- Joint BSC, CUSC, Grid Code Workgroup established
- Held 5 meetings between March and July 2011

CMP191 Defect

- Third Energy Package adopted by EU in July 2009
 - Requires creation of European Network Codes (ENCs)
 - ENCs will be legally binding in GB
 - ENCs likely to have impact on GB codes including CUSC
- ENCs to be drafted by European Network of Transmission System Operator for Electricity members
- NGET is ENTSO-e member and will have access to ENC development process earlier than others in GB

CMP191 Solution

- CMP191 proposes obligation be placed upon NGET to:
 - Consult with CUSC Parties via the CUSC Panel
 - Take into consideration views of CUSC Parties/ GB Stakeholders
- On matters discussed in forums that NGET attends as NETSO that other GB parties do not have access to
 - ENTSO-e meetings
- CMP191 proposes NGET fulfill its obligation through a cross-code forum (Joint European Standing Group)

Joint Workgroup Consultation

- 10 responses received
 - Majority support for CMP191
 - National Grid have concerns about the requirement for an 'obligation'
 - Unanimous support for implementation approach
 - Unanimous support for JESG prior to code modification process concluding

Workgroup Consultation Alternative Modification

- Developed by Workgroup post-consultation
- Extensive debate at the joint Workgroup about what the scope of an ‘obligation’ should mean
- More specific solution
 - “anything under the Third Package that could, in NGET’s reasonable and prudent opinion as NETSO within ENTSO-e, result in a change to the BSC, CUSC or Grid Code”
- Supported by majority of Workgroup members

Code Administrator Consultation

- 4 responses received
 - All supportive of CMP191
 - All supportive of WACM
 - Majority preference for WACM
 - All support implementation approach
 - Concern from one respondent regarding the possibility of JESG being disbanded

National Grid Opinion

- CMP191 and WACM do not better facilitate either Applicable CUSC Objective and should not be implemented
- Objective (a):
 - The proposer's justification in relation to existing Transmission Licence obligations are not relevant to the development of European Network Codes
 - The lack of clarity around the scope of CMP191 does not better facilitate NGET's efficient discharge of its licence obligations
- Objective (b):
 - CMP191 is not the most proportionate way to achieve improved information flows and better stakeholder engagement
 - The JESG can efficiently provide a forum to share information and provide views and therefore a CUSC modification is not required

Panel Recommendation Vote

- (a) the efficient discharge by the licensee of the obligations imposed upon it under the Act and by this licence; and
- (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.