

## CMP219 – CMP192 Post Implementation Clarifications



CUSC Panel – 27/09/2013

Adam Sims

## Background

---

- CMP192 introduced enduring user commitment arrangements for generators into the CUSC
- New arrangements went live from 1<sup>st</sup> April 2013
- However, implementation of CMP192 highlighted that the legal text requires refining
- Raise a ‘tidy-up’ modification prior to further development of CUSC Section 15 for offshore and non-generation users

## Proposed CUSC Modification

---

- Addresses following issues
  - Typographical errors
  - Numbering inconsistencies
  - Redundant text – Transitional arrangements
  - Additional detail required to remove ambiguity
  - Unintended omissions – non generation users
- Proposal raised in May 2013
- 2 Workgroup meetings held

## Workgroup Discussions

---

- Materiality analysis
  - Liability for ‘Actual’ Users – if commissioning delayed by User
  - Pre Trigger Date Liability for ‘Fixed’ Users
- Evidence provided for the original intent of CMP192 workgroup
- Additional changes suggested by the Workgroup members
- Legal text changes
- Other areas outside the remit of CMP219
  - Not in keeping with CMP219’s intent of ***‘clarifications only’***
  - Would require separate modification proposals

## Workgroup Consultation

---

- 3 responses received
  - All generally supportive of CMP219
  - Suggested additional clarifications
  - 1 response – highlighted the issues with security arrangements for DNO connected generation
- No Workgroup Consultation Alternative Requests received

## Workgroup Vote

---

- 5 Workgroup members voted
- 1 Workgroup member wasn't able to attend
- All the members unanimously voted in support of CMP219
  - No WACMs were raised

# Views against Applicable CUSC Objectives

---

nationalgrid

*“The efficient discharge by the licensee of the obligations imposed upon it under the Act”*

- Yes. It improves clarity and facilitates better industry understanding, thus it is efficient

*“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”*

- Yes. It clarifies the treatment of Users and removes the scope for discrimination

## Workgroup Conclusions

---

- Workgroup has met its Terms of Reference
- Agreed legal text
- Implementation 10 working days after the Self-governance appeal window



## Next Steps

---

- Panel invited to:
  - AGREE Workgroup has completed Terms of Reference
  - ACCEPT Workgroup Report
  - AGREE CMP219 progresses to Code Administrator Consultation

# Timetable

<b>27 September</b>	<b>Present Workgroup report to CUSC Modifications Panel</b>
<b>2 October</b>	<b>Issue CA Consultation for 3 weeks</b>
<b>23 October</b>	<b>CA Consultation closes</b>
<b>31 October</b>	<b>Issue draft FMR for industry comment for 1 week</b>
<b>21 November</b>	<b>Issue report for Papers day</b>
<b>29 November</b>	<b>Panel Determination Vote. Appeal window opens</b>
<b>3 December</b>	<b>Final FMR circulated for Panel comment – 1 week</b>
<b>20 December</b>	<b>Appeal Window Closes</b>
<b>8 January</b>	<b>Implementation Date</b>

## Questions?

