

CMP235/236 – ‘Introduction of a new Relevant Interruption Type’ and ‘Clarification of when Disconnection Compensation payments can be expected under a Relevant Interruption’



CUSC Panel – 27th March 2015

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Background

CMP235

- The CUSC currently provides the ability for generators to claim in the event of an issue on the NETS caused solely by the TO's plant or apparatus, which disconnects the generating unit from the NETS.
- The SO can issue instructions to generator to prevent damage or injury to persons, equipment or the NETS.
- CUSC is silent on situations where the SO operates the NETS outside of licence conditions.

Background

CMP236

- Under a Relevant Interruption, the SO may solely disconnect BMU's from the NETS. In most cases the SO would disconnect the generating unit export BMU; although there have been instances where the SO has disconnected the import BMU (station supplies) which could cause the generating unit to lose their output.
- The calculation of Relevant Interruption takes into account 'affected BMU's' being the export BMU. In this instance as the export BMU is still connected, the payment can be £zero.

Proposed CUSC Modification

- CMP235 seeks to amend the description of an Interruption to add a type of Emergency Deenergisation (when a User has had to Emergency Deenergise as a result of the condition or manner of Transmission System operating outside of the Licensee's statutory requirements) as a Relevant Interruption.
- CMP236 seeks to clarify that where station supplies are disconnected solely by National Grid plant or apparatus and the effect of this is to lose the generating units' output, this is a Relevant Interruption and that under the CUSC, Interruption payments can include these situations.

Amalgamation

- CMP235 and CMP236 were proposed separately by EDF Energy and submitted to the CUSC Modifications Panel for their consideration on 26th September 2014.
- The Panel decided to amalgamate these Proposals (ensuring that there would automatically be two Workgroup Alternative CUSC Modifications included within the Final Modification Report which gives the option to implement these two Modifications separately) and sent the Proposal to a Workgroup.

Workgroup Consultation

- 6 responses received
- Majority supportive of the Proposal and proposed implementation approach.

Workgroup Vote

- 5 Workgroup Members voted
- 5 WACMs proposed: WACM1 and WACM2 to progress CMP235 and CMP236 separately. WACM3, WACM4 and WACM5 are based on one alternative applied to the Original (amalgamated Modification), WACM1 (CMP235) and WACM2 (CMP236)
- The Workgroup voted by majority 3/5 that WACM4 (which is the alternative to CMP235 alone) is the best solution and therefore should be implemented.

Workgroup Conclusions

- Terms of Reference have been met.
- Proposed legal text currently being reviewed.
- Implementation 10 Working days following decision (if approved).

Next Steps

- The Panel is invited to:
 - Accept the Workgroup Report
 - Agree for CMP235/236 to progress to Code Administrator Consultation
 - Consider the lessons learned in following slides

Proposed Timetable

1 April 2015	Issue CA Consultation
1 May 2015	CA Consultation closes
6 May 2015	Issue draft FMR for comment
13 May 2015	Deadline for comment
21 May 2015	CUSC Panel Papers Day
29 May 2015	Panel vote
1 June 2015	Issue FMR for final comment
8 June 2015	Deadline for comments
10 June 2015	Final Report sent to Authority for decision
15 July 2015	Indicative 25 day KPI for decision
29 July 2015	CMP235/236 implemented (if approved)

Lessons Learned

Alex Thomason, Code Administrator

Process concerns raised

- Concerns were raised by Proposer and Proposer's organisation during Workgroup
 - Timeliness of process
 - Potential filibustering by Workgroup members
 - Lack of clarity over Workgroup Alternatives
 - Voting process

Code Administrator Views

- Timeliness of process
 - Workgroup held 4 meetings over 6 months
 - 2 extensions requested for 1 month each
 - Workgroup dealt with 2 Modifications that had been amalgamated
- Potential filibustering by Workgroup members
 - Code Administrator considers no intentional filibustering

Code Administrator Views

- Lack of clarity over Workgroup Alternatives
 - Workgroup Alternatives discussed and agreed during final meeting
 - Workgroup agreed it was ready to vote and raised no concerns during the meeting
- Voting process
 - Voting was complicated due to amalgamation
 - Of 7 Workgroup members, 5 voted
 - 2 Workgroup members sought to clarify their vote after the meeting
 - Code Administrator believes due process was followed

Lessons Learned

- Amalgamation
 - Cause of confusion, particularly around Alternatives and voting
 - Careful consideration for future modifications
- Expertise
 - Where gaps in necessary expertise become evident, Workgroup Chair should flag to Panel