

CMP253 – Legal text amendments to CUSC to align with CMP235/6 intentions



CUSC Panel – 25th September 2015
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Background

- Ofgem published its decision on Connection and Use of System Code (CUSC): ‘Introduction of a new Relevant Interruption Type’ (CMP235) and ‘Clarification of when Disconnection Compensation payments can be expected under a Relevant Interruption’ (CMP236)
July 15th 2015
- Implementation **29th July 2015**

Summary of Defect (Past)

- Following Implementation, it was noted that there were some typographical errors in the legal text associated with the Workgroup Alternative implemented (WACM3)
- A customer raised concerns that these errors may prevent future Interruption Payments when under the intention of CMP235/236 these should result in a payment
- Therefore to allay concerns, we felt it appropriate to deal with these errors as soon as possible through the appropriate modifications process as the issues lie within the legal text
- The above concerns were dealt with via CMPFT252. Implemented **22nd September 2015**

Summary of Defect

- This modification aims to deal with grey areas regarding Station Transformers within the legal text which were not dealt with via the previous fast track modification. We did not believe that these changes met the Fast Track Criteria so were not included in CMPFT252, and are being dealt with via this further separate modification.
- The legal text currently refers to “Station BM Units” in the BCA. A customer pointed out that in their BCA’s their Import BM Units were not named “Station BM Units”. If their Import BM Unit was not called “Station BM Units” this may result in an Interruption payment not being paid when it was intended to be under **CMP235/236**

Summary of Defect

- Also within the legal text
- If an Import BM Unit (Station Transformer) is Deenergised and this results in the Generation Unit Deenergising this will result in an interruption Payments if the Interruption was Relevant; as intended by CMP235/236
- However an Import BM Unit may contain more than one Station Transformer. Therefore an Import BM Unit may still be taking load (therefore not Deenergised) even when a Station Transformer may have been tripped resulting in an Interruption to Generation.

Proposed CUSC Modification

- This Proposal seeks to amend;
 - CUSC Section 11 – The Statement of the Balancing Services Use of System Charging Methodology
 - Remove the reference to “Station BM Units” as not all Import BM Units are called this in the BC
 - Reword the legal text so when calculating Interruption payments the Import BM Unit will be classed as Deenergised when a Station transformer within the BM Unit is deenergised.
 - This will align the legal text with the intentions of CMP235/236

Justification against Self Governance criteria

Self Governance criteria

- (a) Is unlikely to have a material effect on:*
- i. Existing or future electricity consumers, and*
 - ii. Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity; and*
 - iii. The operation of the National Electricity Transmission System; and*
 - iv. Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and*
 - v. The CUSC's governance procedures or the CUSC's modification procedures, and*
- (b) Is unlikely to discriminate between different classes of CUSC Parties.*

Justification against Self Governance criteria

Justification for Self Governance

We are not proposing a new type of Interruption or changing how Interruptions are calculated

CMP235/236 has already been consulted on by Industry and Ofgem decided that under WACM3 these types of Interruptions should receive an Interruption payment

This looks to change the legal text to align it with the above

Justification against Self Governance but not Fast Track criteria

Fast Track criteria

- (c) Is properly a housekeeping modification required as a result of some error or factual change; including but not limited to:*
 - (a) Updating names or addresses listed in the CUSC;*
 - (b) Correcting minor typographical errors*
 - (c) Correcting formatting and consistency errors, such as paragraph numbers or*
 - (d) Updating out of date references to other documents or paragraphs.*

We do not believe that this modification meets the criteria of Fast Track as we are proposing changes to legal text more than very minor changes

Code Administrator Proposed Progression

- The Panel is asked to agree:
 - whether CMP253 should be progressed as Self Governance
 - Are we correct in not proposing the Fast Track route?
 - whether CMP253 should progress to either:
 - WorkgroupOr straight to
 - Code Administrator Consultation

CMP253 Indicative timetable (Self Governance)

29th September 2015	Code Administrator Consultation issued (20 Working days)
20th October 2015	Deadline for responses
27th October 2015	Draft CUSC Modification Report issued for Industry comment
3rd November 2015	Deadline for comment
19th November 2015	Draft CUSC Modification Report issued to CUSC Panel
27th November 2015	CUSC Panel determination vote
27th November 2015	Appeal window opens
18th December 2015	Appeal window closes
6th January 2016	Implementation date (if approved)