

# Code Administrator Meeting Summary

## Meeting name: CMP392 Workgroup 2

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**Date:** 23 November 2022

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## Contact Details

**Chair:** Teri Puddefoot, National Grid ESO [Teri.puddefoot@nationalgrideso.com](mailto:Teri.puddefoot@nationalgrideso.com)

**Proposer:** Garth Graham, SSE Generation [garth.graham@sse.com](mailto:garth.graham@sse.com)

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## Key areas of discussion

- The ESO explained that they were currently working with Ofgem to try and understand what the recent [Court of Appeal Judgement](#) relating to Commission Regulation (EU) No.838/2010 meant and what next steps may be required. But as the judgement did not relate to the Connection Exclusion itself, it should not impact their Workgroup discussions or the progression of the modification.
  - The ESO presented their draft 2023/24 Guidance document on the calculation of generator TNUoS Adjustment Tariffs for the purposes of the Limiting Regulation, which they are looking to publish for the interim period until CMP392 is implemented (if approved). The Workgroup went onto discuss the following points:
    - The CUSC calculation excludes demand TNUoS charges paid by generators, i.e. station demand charges.
    - An “eligible generator” under Total Actual Generation Output, is anyone who pays Generation TNUoS charges. This includes all transmission connected generators as well as distribution connected generators above 100 megawatts, who would only pay the wider element of the TNUoS charge.
    - GEMMA have previously confirmed that a generator connects to the “NET” and not to the “MITS”. The guidance document needs to be updated to reflect this.
    - Onshore and offshore substations, and local circuit assets should be treated the same and assessed on a case by case basis.
    - Are two sets of defined terms needed, for “pre-existing” and “non pre-existing” assets. It was agreed that further discussions were needed on this and that a non-charging modification would need to be raised for the section 11 change.
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- Shared assets are not determinative of whether something falls within the connection exclusion or not.
- The Proposer explained that CMP392 was not trying to change how the connection exclusion was calculated, but it was actually trying to provide visibility, openness, and transparency, in order to allow parties, the ability to check and challenge how the charge had been calculated, along with whether the assets had been correctly labelled as PEA or NPEA. Therefore, as part of the Ex-Post reconciliation, could the ESO publish final year end PEA’s and NPEA’s for all projects and customers. The Workgroup acknowledged that this would be a very large and difficult task for the first year. But going forwards it would only require incremental changes for any new generators that came along. The ESO highlighted issues around confidentiality and commercially sensitive data but agreed to look into this further and explain what commercial blockers they were facing, so that the Workgroup could then consider what the feasible alternatives may be.
- The Proposer advised that in their view any disputes should be dealt in a similar way to the current ALF disputes process. Whereby, the ESO publishes their annual data/figures, industry is then given a period of time to review this, if an anomaly is identified then this is raised with the ESO. If the matter is not resolved, then a formal dispute can be logged under the CUSC’s disputes process before finally escalating to Ofgem.
- The Workgroup discussed what information should be documented within the CUSC or a supporting guidance note. The Proposer’s view was that as much detail as possible should be hard wired within the CUSC, rather than a guidance document which can be amended without any proper governance. Whilst the ESO representatives’ views was that the CUSC should not be too prescriptive.
- The Workgroup went on to map out the commonalities and differences between the draft guidance document and the CMP392 Original proposal in a matrix.

**Next Steps**

- ESO to finalise the “Draft Interim Guidance” and share comparison matrix with Workgroup. Workgroup to discuss possible alternatives and implementation approach.

**Actions**

Action number	Owner	Action	Comment	Due by	Status
1	JH	Amendments suggested by the Workgroup to the guidance document: - Clarify Station Demand Charges are not included. – Amend any references to the generator wishing to connect to the “MITS” to the “NET” - Onshore and offshore substations and local circuit assets should be treated the same and assessed on a case by case basis.		WG 3	Open

- Make it more explicit within the guidance document that the upgrade is the Non Pre-Existing Asset (NPEA).
- Consider whether a section is needed on the “Interconnected test”.
- Provide further detail /clarity on Annex 2, i.e., the processes that are modelled, the activities that are broadly calculations and how it comes together at the end.

2	JH	Feedback offline to any other comments raised by WG members on the draft guidance document.	WG3	Open
3	JH	Ex-post compliance assessment - confirm which TCMF these were presented at.	WG 3	Open
4	JZ/JH	Check if the ESO can publish final year end PEA's and NPEA's for all projects and customers or explain commercial blockers preventing this.	WG 3	Open

**Attendees**

Teri Puddefoot	Code Administrator National Grid ESO	Chair
Shazia Akhtar	Code Administrator National Grid ESO	Technical Secretary
Garth Graham	SSE Generation	Proposer
Joseph Henry	National Grid ESO	ESO Representative
Grace March	Sembcorp	Workgroup Member
John Harmer	Saltend Cogeneration Company	Workgroup Member
Simon Vicary	EDF Energy	Workgroup Member
Sam Aitchison	Island Green Power UK Limited	Workgroup Member
Joseph Dunn	Scottish Power	Workgroup Member Alternate
Paul Youngman	Drax	Workgroup Member Alternate
Jo Zhou	National Grid ESO	Observer
Harriet Harmon	Ofgem	Observer