

CMP430/431

Workgroup 8 Monday 29 April 2024

Online Meeting via Teams

WELCOME



Expectations of a Workgroup Member

Contribute to the discussion

Be respectful of each other's opinions

Language and Conduct to be consistent with the values of equality and diversity

Do not share commercially sensitive information

Be prepared - Review Papers and Reports ahead of meetings

Complete actions in a timely manner

Keep to agreed scope

Email communications to/cc'ing the .box email

Your Roles

Help refine/develop the solution(s)

Bring forward alternatives as early as possible

Vote on whether or not to proceed with requests for Alternatives

Vote on whether the solution(s) better facilitate the Code Objectives



Objectives and Timeline

Deborah Spencer – ESO Code Administrator



Objectives

- **Introductions**
- **Action Review**
- **Workgroup Consultation Responses**
- **Legal Text Update**
- **Next steps**



Action Update

Deborah Spencer – ESO Code Administrator

Action Review

5	WG2	Proposer	Consider if there is any insight available into impact of Triads over winter 2023 and if this has changed following implementation of the Targeted Charging Review (TCR)	WG3	Open
6	WG3	Proposer	To speak with Ofgem about possible data available through previous RFI	WG4	Open
9	WG3	Proposer	To meet with Ofgem and MHHS Programme about the interacting timescales and the certainty needed around the Legal Text	WG4	Open
10	WG4	Proposer/ HB	To meet with HB to consider the scenarios for contracts from October.	WG5	Open
12	WG5	Proposer/ Elexon Representatives	CUSC Section 14 changes 14.17.41. To consider if a further table is required to include export.	WG6	Open
13	WG6	Ofgem Representative	To discuss with Elexon about the information that was provided through DCD414 process in respect of CT/VT sites.	WG7	Open
14	WG6	DH (ESO SME)	To conduct and analysis on the profiles for 5 to 8	WG7	Open



Workgroup Consultation Responses

All

Summary of the 5 non-confidential responses for CMP430

Q1 - Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?

- Three respondents believed that CMP430 Original Proposal better facilitated the objectives.
- One respondent was neutral to objectives a, b, c and d, but replied negative for e.
- Two respondents replied the Original Proposal objectives a, b, c and e better facilitated the applicable objectives. one respondent advised they were not able to judge against objective d.
- One respondent advised that a, b and e of the Original Proposal better facilitated the applicable objectives.
- One respondent made no comment.

Q2 - Do you support the proposed implementation approach?

- All respondents were supportive of the implementation approach.

Q3 - Do you have any other comments?

- One respondent suggested a three month minimum lead time to implement changes.
- One respondent noted they were disappointed that it had taken the Proposer so long to raise a change to reflect the know impacts of MHHS.
- Another responded noting that the lack of a reliable estimate of the number of customers impacted and the timeliness/availability of relevant data to suppliers to correctly price customers in the future will lead to inefficient outcomes.

Q4 - Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?

- None of the respondents wished to raise a Alternative request.

Q5 - Do you agree with the Workgroup's assessment that MOD430 does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the CUSC

- Two respondents agreed with the Workgroups assessment, one respondent noted they were unable to make a judgement, and all other respondents made no comment.

Q6- Do you have any comments on the impact of MOD430 on the EBR Objectives?

- Two respondents made no comment, two respondents felt there was no impact, and another respondent felt they were unable to make a judgement.

Summary of the 5 non-confidential responses for CMP430

Q7- Does the Original Proposal have an impact on your business and if so, to what extent? e.g., Consumers treated differently in new arrangements?

- Three respondents advise that their business would be impacted by the Original Proposal.
- One respondent advised there would be minimal impact other than making changes to systems allowing correct billing of customers.
- One respondent advised that although there would be no impact to their business they did not agree with the differentiation for domestic and non domestic unmetered customers.
- Another respondent advised that there is expected to be a financial impact to their business from this change which is currently difficult to estimate. Financial impacts (if material) will be a one off on the initial implementation of the Proposal.
- One respondent made no comment.

Q8- Does the Original Proposal have an impact on the systems and processes used by your organisation, and if so, to what extent? e.g., pricing, billing, settlement

- Three respondent confirmed that their systems and processes would be impacted by the change
- One respondent made no comment and one respondent confirmed they would not be impacted.

Q9- Do you agree with the scenarios identified that could be subject to different charging arrangements as a result of CMP430?

- One respondent noted that as all unmeted customers will be HH by end of March 2025, the line in Annex 4 was confusing, adding, the table uses the term Current Charging Arrangements Pre MHHS migration and quotes a current MC=B. By April 2025. there will not be any MC=B as all unmetered (Domestic and Non-Domestic) will have all moved to MC=D. The table should be showing the position in April 2025 (the beginning of the charging year), where Domestic unmetered is MC=D and Triad moving to Triad.
- Two respondents agreed, two respondents did not agree and one respondent made no comment

Q10- For suppliers only: How many sites does your organisation supply in the following scenario:

- Four respondents made no comment.
- One respondent highlighted b) Sites that are settled as Measurement Class A pre-MHHS migration that will have a Connection Type Indicator = L or H (meaning they are CT Metered) and a Domestic Premises Indicator = False post -MHHS migration, but made no further comment.

Q11-Do you agree that the Original Proposal should be considered as enduring, or do you believe should it be time limited – e.g., Linked to Market Wide Half Hourly Settlement Milestones?

- Four respondents agreed that the Proposal should be enduring and one respondent felt the proposal should be time limited.

Q12-Do you agree that the Original Proposal will not impact the delivery of the MHHS Programme delivery Milestones?

- Four respondents agreed there would be no impact and one respondent made no comment.

Summary of the 1 non-confidential responses for CMP431

Q1 - Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?

- The respondent agreed that CMP431 Original Proposal better facilitated the objectives b and d.

Q2 - Do you support the proposed implementation approach?

- The respondents was supportive of the implementation approach.

Q3 - Do you have any other comments?

- The respondent made no comment

Q4 - Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?

- The respondent did not wish to raise a Alternative request.

Q5 - Do you agree with the Workgroup's assessment that MOD431 does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the CUSC

- The respondent agreed with the Workgroups assessment.

Q6- Do you have any comments on the impact of MOD431 on the EBR Objectives?

- The respondent made no comment.

Q7-Do you believe any additional definitions or changes to existing CUSC definitions are required as a result of CMP430 or CMP431

- The respondent advised that Depending on the approach adopted CMP430 for legal text the Workgroup may wish to consider the introduction to CUSC on the introduction of “**Domestic Premises**” as a stand alone term or reference to BSC / Supply Licence.



Legal Text Update

Proposer – ESO



Market Wide Half Hourly Settlement (MHHS)

CMP430/431 – Legal Text (new approach)

Keren Kelly and Neil Dewar

Agenda

1. New Approach – Describing Changes to Charging and Non-Charging Arrangements
2. Discussions
3. Next steps



New Approach - Describing Changes to Charging and Non-Charging Arrangements

Legal Text approach for CMP430 (CUSC S14)

- **Previous feedback was that we could not introduce new terms and definitions to CUSC that had not been approved – i.e. Link to BSC (MC, CTI, DPI) in S11 and S14 was too complicated and confusing**
- ESO developed 3 new approaches for legal text based on feedback:
 - New Approach 1 – Describing changes to Charging, Non-Charging and BSC arrangements
 - New Approach 2 – Describing charging Arrangements without newly defined terms
 - New Approach 3 – Describing changes to Charging and Non-Charging Arrangements
- ESO met with Ofgem and ESO Legal team last week to go through approaches before bringing these to you today
 - New Approach 1 was discounted as not viable and resulted in the same concerns seen previously and would likely lead to “send back”
 - New Approach 2 could work but has not been subject to legal review so have not shared this with you today
 - New Approach 3 has been subject to ESO Legal review and is the preferred approach but potentially needs refining (less is more)
- Approach principle is based on explaining to CUSC Parties what changes as a result of transitioning to the MHHS arrangements – Annex 4 from the Consultation
- Introduce new section to CUSC S14 and explain the change in charging arrangements in the highlighted boxes
- Whilst we cannot introduce slide, we are able to add a guidance to CUSC

CMP430 Proposed TNUoS Charging Arrangements pre and post MHHS Migration of an MPAN

Domestic Premises Indicator	Connection Type Indicator	Current Measurement Class (non-MHHS)	Current Charging Arrangement Pre MHHS Migration	Proposed Charging Arrangement under CMP430 Following MHHS Migration	Derived MHHS Measurement Class
Domestic (T)	W (Whole Current); L (LV with Current Transformer); H (HV with Current Transformer) or E (EHV with Current Transformer)	A	4pm – 7pm	4pm – 7pm	F
		F	4pm – 7pm	4pm – 7pm	F
		C	Triad	4pm – 7pm	F
	U (Unmetered)	B	4pm – 7pm	Triad	D*
Non- Domestic (F)	W (Whole Current)	G	4pm – 7pm	4pm – 7pm	G
		A	4pm – 7pm	4pm – 7pm	G
	L (LV with Current Transformer)	C	Triad	Triad	C**
		E	Triad	Triad	C**
		A	4pm – 7pm	Triad	C**
	H (HV with Current Transformer)	C	Triad	Triad	C**
		E	Triad	Triad	C**
		A	4pm – 7pm	Triad	C**
	E (EHV with Current Transformer)	C	Triad	Triad	C**
		E	Triad	Triad	C**
	U (Unmetered)	D	Triad	Triad	D

Triad = Chargeable Demand Locational Capacity

4pm – 7pm = Chargeable Energy Capacity

Yellow highlight shows possible change in TNUoS charging as a result of CMP430

*All NHH Unmetered (Measurement Class B) will be transferred to Measurement Class D by the start of the migration period. N.B. Measurement Class B is currently charged 4pm-7pm and reason for change is as a result of the implementation of P434. Whilst theoretically possible, the expectation is that there will be no Domestic Unmetered demand.

**Measurement Class C will contain the sum of Measurement Classes C and E for Migrated MPANs. This will have no charging impact as both Measurement Class C and E are charged Triad

Measurement Class A is non Half Hourly Metered which will include Domestic and Non-Domestic and a variety of different Connection Types. The table highlights future treatment depending on different combinations

Suggested Guidance note to add to CUSC for CMP430

Domestic Premises Indicator	Connection Type Indicator	Proposed Charging Arrangement under CMP430 Following MHHS Transition
Domestic (T)	W (Whole Current); L (LV with Current Transformer); H (HV with Current Transformer) or E (EHV with Current Transformer)	4pm – 7pm
		4pm – 7pm
		4pm – 7pm
	U (Unmetered)	Triad
Non- Domestic (F)	W (Whole Current)	4pm – 7pm
		4pm – 7pm
	L (LV with Current Transformer)	Triad
		Triad
		Triad
	H (HV with Current Transformer)	Triad
		Triad
		Triad
	E (EHV with Current Transformer)	Triad
		Triad
U (Unmetered)	Triad	

Suggested Legal Text for CMP431 (CUSC S11)

- **Minimal Definitions required under this approach**
- Domestic Premises could be defined using reference to the BSC or Supply Licence
- If it is established no changes required to S3 or S11 of CUSC, CMP431 could be withdrawn

Suggested Legal Text for CMP430 (CUSC S14)

This section describes how Meters will be charged from M11 of MHHS Implementation as defined in the **Balancing and Settlement Code** (Section C12.1.1), further defined in (Section C12.2.9) and outlined in the [Authority's decision dated 12 June 2023](#).

- 14.17.41.1 For the relevant Charging Year until the specified Meter Point Administration Number(s) (MPAN) is subject to transition to the MHHS Target Operating Model as defined in **the Balancing and Settlement Code** 12.2.24, it will continue to be charged TNUoS using the existing Charging arrangements
- 14.17.41.2 From the relevant point during the Charging Year that the specified Meter Point Administration Number(s) (MPAN) transition(s) to the MHHS Target Operating Model, as defined in **the Balancing and Settlement Code** 12.2.24 it will be charged TNUoS using the existing Charging arrangements, except in the following circumstances:
- When an MPAN with a NHH Metering System transitions to a HH Metering System with current transformer at a non-Domestic Premises and is reported as such from BSCCo to the Company, it will be treated as Chargeable Demand Locational Capacity
 - When an MPAN with a HH Metering System -transitions to a HH Metering System with whole current or current transformer at a Domestic Premises **[as defined in the Balancing and Settlement Code]** and is reported as such from BSCCo to the Company, it will be treated as Chargeable Energy Capacity
- 14.17.41.3 Should an Meter Point Administration Number (MPAN) be subject to reverse migration during the timelines, of the MHHS Implementation Timetable, as defined in the Balancing and Settlement Code, Section C12.2.11, it will revert to be charged TNUoS according to 14.17.41.1 until such time that the MPAN is re-introduced to the MHHS Target Operating Model, whereby it will be charged TNUoS according to 14.17.41.2



AOB/Next Steps

Deborah Spencer – ESO Code Administrator

Timeline for CMP430 – Updated after CUSC Panel (23 February 2024)

Milestone	Date	Milestone	Date
Modification presented to Panel	23 February 2024	Code Administrator Consultation (6 working days)	10 June 2024 to 14 June 2024
Workgroup Nominations (4 Working Days)	23 February 2024 to 29 February 2024	Draft Final Modification Report (DFMR) issued to Panel (4 working days)	24 June 2024
Ofgem grant Urgency	29 February 2024 (5pm)	Panel undertake DFMR recommendation vote	28 June 2024
Workgroup 1 to 7 (assuming Ofgem have granted Urgency)	06 March 2024 11 March 2024 13 March 2024 – cancelled 19 March 2024 28 March 2024 05 April 2024 15 April 2024 17 April 2024	Final Modification Report issued to Panel to check votes recorded correctly	28 June 2024
Workgroup Consultation (5 working days)	17 April 2024 – 24 April 2024	Final Modification Report issued to Ofgem	28 June 2024
Workgroup 8 to 14 - Assess Workgroup Consultation Responses and Workgroup Vote	29 April 2024 03 May 2024 – cancelled 08 May 2024 13 May 2024 20 May 2024 24 May 2024 30 May 2024	Ofgem decision	30 September 2024
Workgroup Report issued to CUSC dot box	03 June 2024	Implementation Date	01 April 2025
Workgroup Report presented to Special Panel (Panel agree Workgroup report has met its Terms of Reference)	07 June 2024		