

**CUSC Alternative Form – Non Charging**

# CMP434 Alternative Request 8

**Overview:** Include an explicit requirement within CUSC for all DNOs to submit Gate 2 information to the ESO within 30 days of it being received from the customer / user.

**Proposer:** Barnaby Wharton



Representing CBS Energy Storage Assets  
Ltd

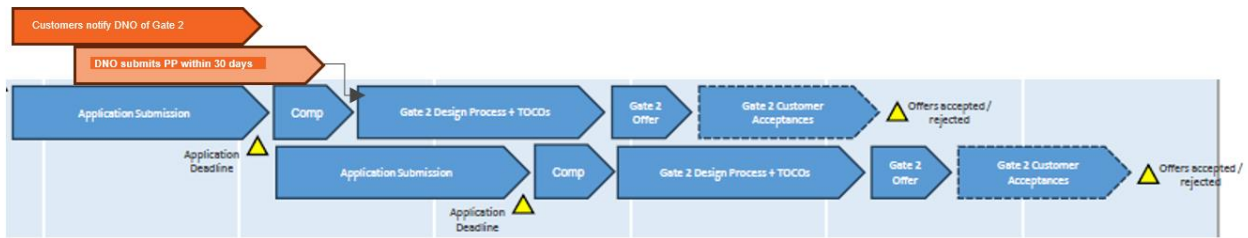
☒ I/We confirm that this Alternative Request proposes to modify the non - charging section of the CUSC only

## What is the proposed alternative solution?

Include an explicit requirement within CUSC for all DNOs to submit Gate 2 information to the ESO within 30 days of it being received from the customer / user.

This is necessary to ensure that delays associated with DNO internal processes do not lead to embedded customers "missing" a Gate 2 window. It is noted that currently many DNOs have taken over 12 months to submit project progressions due, in part, to the lack of any guaranteed standard timeframe. We therefore believe a codified timeframe is required, instead of the current "expectation" within Element 18, Page 34 of the consultation document.

To maintain fair and equitable treatment between DNO and Transmission projects, the competency check period following each Gate 2 application submission window should allow for the last DNO submissions to arrive with the ESO. After this period the ESO would then commence the Gate 2 design process and TOCOs as shown below.



## What is the difference between this and the Original Proposal?

For members with embedded projects, there are potentially hugely damaging unintended consequences of the Element 18 opening statement: "The process for how DNOs and transmission connected iDNOs notify the ESO of Relevant Embedded Small/Medium Power Stations which meet the Gate 2 criteria is largely based around BAU as it is today."

Element 18, Page 34 refers to an "expectation" in reference to the flow of customer information between the DNO and ESO. This proposed alternative would instead apply a codified timeframe, introducing an explicit requirement within CUSC for all DNOs to submit Gate 2 information to the ESO within 30 days of it being received from the customer / user.

## What is the impact of this change?

### Proposer's Assessment against CUSC Non-Charging Objectives

Relevant Objective	Identified impact
(a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;	<b>Positive</b> The alternative sets a minimum standard for DNOs which should allow the ESO and TOs to better discharge their obligations.
(b) 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;	<b>Positive</b> Facilitates a more equitable connections market for Transmission and Distribution Users.
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and	<b>Neutral</b> No foreseen impact.
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	<b>Positive</b> The alternative promotes efficiency.

\*The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.

## When will this change take place?

### Implementation date:

1 January 2025 - At the time of CMP434 implementation.

### Implementation approach:

Noted DNOs with support from the ENA may have to consider process changes and the development of guidance to ensure all DNOs and their Licence Areas have a robust approach in place CMP434 implementation.

## Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
DNO	Distribution Network Operator
ENA	Electricity Network Association
ESO	Electricity System Operator
iDNO	Independent Distribution Network Operators
TOCO	Transmission Owner Construction Offer

### Reference material: Proposed Gate 2 Process Additions

Process additions are presented in **orange**.

