

## Connection and Use of System Code (CUSC)

### Title of the CUSC Modification Proposal

Application of Statement of Works Process when a modification application is made

### Submission Date

16<sup>th</sup> October 2014

### Description of the Issue or Defect that the CUSC Modification Proposal seeks to address

The Statement of Works Process (SoW) (CUSC 6.5.5) was implemented by National Grid under CUSC Amendment Proposal (CAP) 97. Previously, where a developer connects to a DNO and that DNO believed that the connection/resulting DNO works may have an impact on the Transmission System, the DNO was required to make a Modification Application. CAP97 sought to avoid a full Modification Application in every case by providing a cheaper and shorter process whereby a DNO could request National Grid to perform initial analysis and determine if there is an impact or not on the Transmission System. This is called the Statement of Works process. Based on the outcome of this, the developer could decide whether to ask the DNO to proceed with a Modification Application or not. The CUSC currently requires that a DNO who knows or believes a connection will impact the Transmission System will submit a Statement of Works request prior to submitting a Modification Application.

A series of Ofgem led forums in 2013/14 established that embedded generators have difficulty understanding how their development impacts on the Transmission network. Developers see the Statement of Works process as taking too long and costing too much, with a lack of transparency in the process.

One of the issues identified concerned the provision for the application of the Statement of Works process even in instances where the DNO is certain that there is an impact on the Transmission System resulting from the developer's connection request. This is inefficient as the DNO does not need to determine if there is an impact, but could instead directly proceed to a Modification Application.

The Statement of Works process also incurs a fee chargeable by National Grid to the DNO, and can take up to four months in terms of turnaround. By requiring the DNO to enter into this process where they already know that the connection will impact the Transmission System they could incur inefficient additional costs and delay the overall connection process for the developer.

We also understand that a Statement of Works request could result in the need for a new Connection Application rather than a Modification Application, and we believe that further clarity in the legal text in this area may also be required.

### Description of the CUSC Modification Proposal

This modification proposal would allow a DNO to choose to directly submit a Modification Application in respect of a developer connection without first engaging the Statement of Works process.

It is proposed that when a DNO receives a distribution connection application, and that DNO knows this will impact the Transmission system, the DNO may directly submit a Modification Application as described under paragraph 6.9. In the case when a DNO receives a distribution connection application, and that DNO is unsure of its impact, then the DNO may continue to submit a request for Statement of Works as described under paragraph 6.5.

The attached document provides suggested legal text for the modification. Textual changes for the potential inclusion of Connection Applications arising from a Statement of Works request have not been included at this stage.

### Impact on the CUSC

Changes to paragraph 6.5.5.1 (Suggested legal text attached).

### Do you believe the CUSC Modification Proposal will have a material impact on Greenhouse Gas Emissions? Yes / No

No.

### Impact on Core Industry Documentation. Please tick the relevant boxes and provide any supporting information

BSC

Grid Code

STC

Other   
(please specify)

None.

**Urgency Recommended: Yes / No**

No.

**Justification for Urgency Recommendation**

N/A

**Self-Governance Recommended: Yes / No**

No.

**Justification for Self-Governance Recommendation**

N/A.

**Should this CUSC Modification Proposal be considered exempt from any ongoing Significant Code Reviews?**

Yes.

**Impact on Computer Systems and Processes used by CUSC Parties:**

No significant impact.

**Details of any Related Modification to Other Industry Codes**

None.

**Justification for CUSC Modification Proposal with Reference to Applicable CUSC Objectives:**

**Please tick the relevant boxes and provide justification:**

- (a) the efficient discharge by The Company of the obligations imposed upon it by the Act and the Transmission Licence
- (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.
- (c) compliance with the Electricity Regulation and any relevant legally binding decision of the

European Commission and/or the Agency.  
 These are defined within the National Grid Electricity Transmission plc Licence under Standard Condition C10, paragraph 1.

Objective (c) was added in November 2011. This refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).

The proposed changes remove a barrier to competition by reducing inefficient costs and timescales for parties wishing to connect to distribution networks. This better facilitates applicable objective (b).

### Additional details

<b>Details of Proposer:</b> (Organisation Name)	David Corby National Grid
<b>Capacity in which the CUSC Modification Proposal is being proposed:</b> (i.e. CUSC Party, BSC Party or “National Consumer Council”)	National Electricity Transmission System Operator
<b>Details of Proposer’s Representative:</b> Name: Organisation: Telephone Number: Email Address:	David Corby National Grid 01926 654912 <a href="mailto:David.Corby@nationalgrid.com">David.Corby@nationalgrid.com</a>
<b>Details of Representative’s Alternate:</b> Name: Organisation: Telephone Number: Email Address:	Andrew Wainwright National Grid 01926 655944 Andy.wainwright@nationalgrid.com
<b>Attachments (Yes/No):</b> <b>If Yes, Title and No. of pages of each Attachment:</b> Suggested Legal Text (1 Page)	

## Contact Us

If you have any questions or need any advice on how to fill in this form please contact the Panel Secretary:

E-mail [cusc.team@nationalgrid.com](mailto:cusc.team@nationalgrid.com)

Phone: 01926 653606

For examples of recent CUSC Modifications Proposals that have been raised please visit the National Grid Website at <http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/CUSC/Modifications/Current/>

## Submitting the Proposal

Once you have completed this form, please return to the Panel Secretary, either by email to [jade.clarke@nationalgrid.com](mailto:jade.clarke@nationalgrid.com) and copied to [cusc.team@nationalgrid.com](mailto:cusc.team@nationalgrid.com), or by post to:

Jade Clarke  
CUSC Modifications Panel Secretary, TNS  
National Grid Electricity Transmission plc  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

If no more information is required, we will contact you with a Modification Proposal number and the date the Proposal will be considered by the Panel. If, in the opinion of the Panel Secretary, the form fails to provide the information required in the CUSC, the Proposal can be rejected. You will be informed of the rejection and the Panel will discuss the issue at the next meeting. The Panel can reverse the Panel Secretary's decision and if this happens the Panel Secretary will inform you.

Proposed Legal text (numbering based on CUSC section 6 v1.22)

6.5.5 Statement of Works

6.5.5.1 Any **User** who owns or operates a **Distribution System** shall, as soon as reasonably practicable upon receipt of a request for a connection to and / or for the use of that **User's Distribution System** from a **Relevant Embedded Medium Power Station** or a **Relevant Embedded Small Power Station**, **except where it has submitted a Modification Application in respect of such a request**, submit to **The Company** a **Request for a Statement of Works**. Such a submission by a **User** who owns or operates a **Distribution System** of a **Request for a Statement of Works** will be substantially in the form of Exhibit U

CUSC exhibit I:

SECTION C. TECHNICAL INFORMATION

1. Summary of Application (brief description of plant to be connected):  
.....  
.....  
.....
2. Please provide full details of the proposed **Modification** together with the relevant **Standard Planning Data** as listed in Part 1 of the Appendix to the **Planning Code** to the extent that the data will change from previously submitted Committed Project Planning Data or Connected Planning Data as a result of the proposed **Modification**. Note: the data concerned form part of the **Planning Code** and **Data Registration Code**. **Applicants** should refer to these sections of the **Grid Code** for an explanation. Further guidance is available from **The Company**<sup>3</sup> on request.
3. Please notify **The Company** as to whether the **Modification** is associated with a **BELLA/BEGA Application** and if so details of the relevant **BELLA/BEGA Application**.  
  
BELLA/BEGA Agreement Ref: .....  
  
Site of Connection.....
4. **Please notify **The Company** as to whether the **Modification** is in respect of a request for a connection to and / or for the use of the **User's Distribution System** from a **Relevant Embedded Medium Power Station** or a**

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<sup>3</sup> Customer Services, National Grid Electricity Transmission plc, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA (Telephone No. 01926 654634)

**Relevant Embedded Small Power Station**, and therefore relieves the requirement to raise a **Request for a Statement of Works** under 6.5.5.1

Yes / No.....