

Stage 02: Workgroup Consultation

Connection and Use of System Code (CUSC)

CMP256

‘Potential consequential changes to the CUSC as a result of CMP244’

CMP256 seeks to introduce consequential changes to Section 3 and 11 of the CUSC, as a result of charging modification CMP244. CMP244 is seeking to change Section 14 of the CUSC to increase the length of the notice period for TNUoS tariffs which is currently 2 months.

This document contains the discussion of the Workgroup which formed in December 2015 to develop and assess the proposal. Any interested party is able to make a response in line with the guidance set out in Section 4 of this document.

Published on: 8th December 2015
Length of Consultation: 5 Working days
Responses by: 15th December 2015



The Workgroup concludes:

To be completed following the Workgroup Consultation



High Impact:

All parties liable for TNUoS and Transmission companies

What stage is this document at?

01	Initial Written Assessment
02	Workgroup Consultation
03	Workgroup Report
04	Code Administrator Consultation
05	Draft CUSC Modification Report
06	Final CUSC Modification Report

Contents

1	Summary	3
2	Key Issues and Summary of Workgroup Discussions	5
3	Impacts and Implementation	6
4	How to respond to the consultation	7
	Annex 1 – CMP256 CUSC Modification Proposal Form.....	8
	Annex 2 – CMP256 Terms of Reference.....	15
	Annex 3 – Workgroup attendance register.....	20

About this document

This document is a Workgroup consultation which seeks the views of CUSC parties and any other interested parties in relation to the issues raised by the CMP256 CUSC Modification Proposal which was raised by EDF Energy and developed by the Workgroup. Parties are requested to respond by **5pm on 15th December** to CUSC.team@nationalgrid.com using the Workgroup Consultation Response Proforma which can be found on the following link:
<http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/CUSC/Modifications/CMP256/>

Document Control

Version	Date	Author	Change Reference
0.1	30/11/2015	Code Administrator	Draft Workgroup Consultation to Workgroup for comment
0.2	08/11/2015	Code Administrator	Final version Workgroup Consultation issued to Industry



Any Questions?

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1 Summary

- 1.1 CMP256 is a CUSC Modification proposal raised by EDF Energy and submitted to the CUSC Modifications Panel (the Panel) for their consideration in November 2015. A copy of this proposal is provided in Annex 1. The CUSC Panel agreed that CMP256 should be considered by a Workgroup and decided it appropriate for the existing CMP244 Workgroup to consider CMP256 alongside CMP244. The Panel requested CMP256 to be sent out for a 5 day Workgroup Consultation and then aim to proceed to Code Administrator Consultation alongside CMP244.
- 1.2 The CMP256 proposal seeks to introduce consequential changes to Section 3 (Use of System) and Section 11 (Interpretation and Definitions) of the CUSC as a result of CMP244 (these changes are vital to give effect to CMP244, if it were passed). CMP244, if passed, would extend the TNUoS tariff notice period to a period of (initially) at least 15 months and now 6 to 8 months under the revised Original Proposal. Although CMP244 has yet to be agreed, this modification seeks to ensure that changes to the other sections of the CUSC can be implemented in parallel with the changes to Section 14 if adopted under CMP244.
- 1.3 It was proposed by the Panel that following an initial Workgroup and Workgroup Consultation for CMP256, that CMP244 and CMP256 should be considered together, in particular, with a joint Code Administrator Consultation. See Figure 1 for an illustration of the indicative process for both modifications.

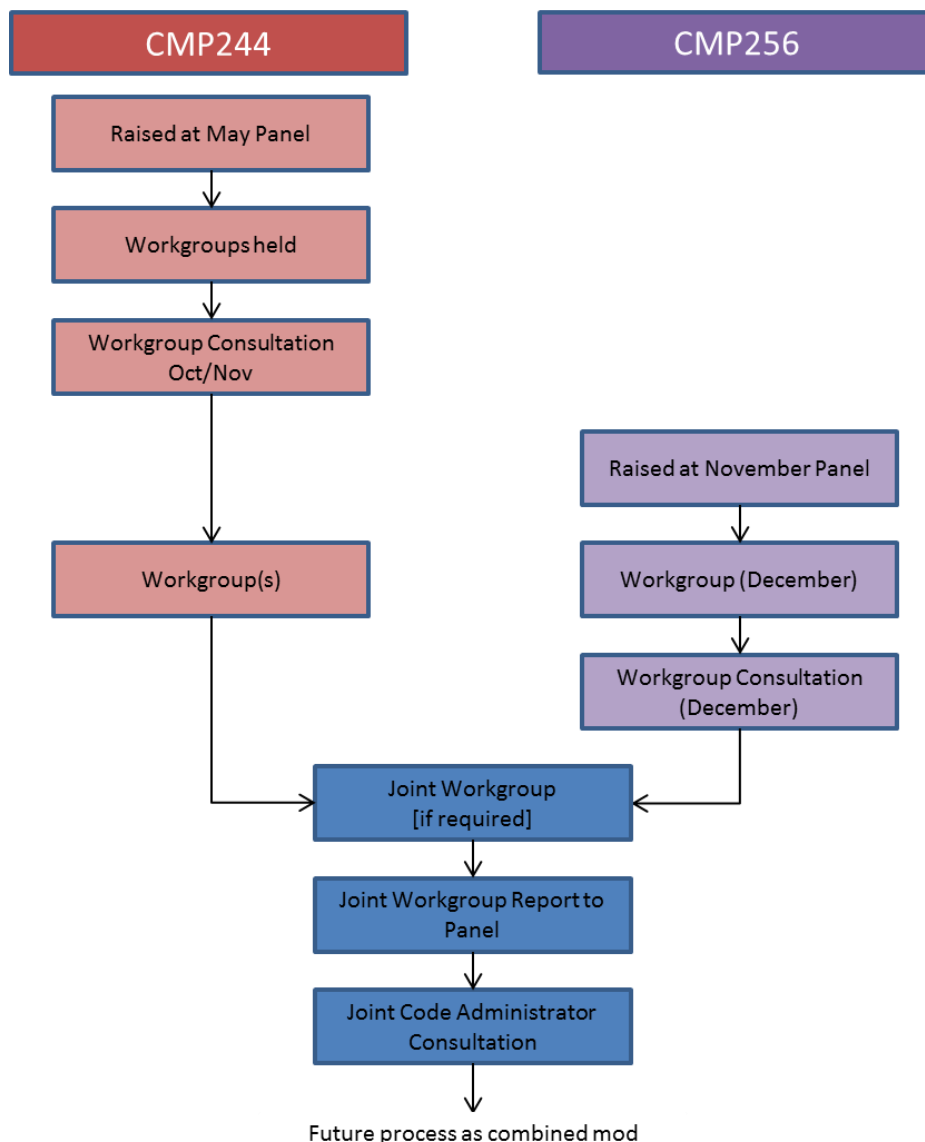


Figure 1: Indicative Process for CMP244, CMP256 and how they will be dealt with together in future.

- 1.4 This document describes the Original CMP256 CUSC Modification Proposal (the Proposal), and summarises the deliberations of the Workgroup. The Workgroup met on 1st December 2015 with a membership the same as that for the CMP244 Workgroup. A copy of the Workgroup Terms of Reference is provided in Annex 2.
- 1.5 **Neither the CMP256 Workgroup nor this Workgroup Consultation seek to cover the material that has previously been subject to the Workgroup Consultation for CMP244.** The CMP244 Workgroup Consultation¹ was issued on 22 October 2015 for an extended period of 20 working days and closed on 19 November 2015. The responses are now being considered by the Workgroup.
- 1.6 Following this CMP256 Consultation, the Workgroup will consider any responses, vote on the best solution to the defect and present a joint report along with CMP244 to the Panel at the January 2016 Panel meeting.
- 1.7 The remainder of this document is structured as follows:
 - Section 2: Key Issues and Summary
 - Section 3: Impacts and Implementation
 - Section 4: How to respond to the consultation
- 1.8 This Workgroup Consultation has been prepared in accordance with the terms of the CUSC. An electronic copy can be found on the National Grid Website, <http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/CUSC/Modifications/CMP256/>, along with the Modification Proposal Form.
- 1.9 For further information on CMP244, please visit the National Grid website via the following link for all previous publications; <http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/CUSC/Modifications/CMP244/>

¹ CMP244 Workgroup Consultation: <http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=43484>

2 Key Issues and Summary of Workgroup Discussions

- 2.1 In May 2015, CMP244 'Set final TNUoS tariffs at least 15 months ahead of the charging year' was raised by EDF. Following analysis at the CMP254 industry Workgroup, the Proposer decided to modify the Original Proposal to suggest an extended notice period of 6-8 months for TNUoS tariffs. This modified CMP244 Original Proposal is currently within the Workgroup development stage (its Workgroup consultation closed on 19th November 2015).
- 2.2 As part of the Workgroup analysis, the CMP244 Workgroup identified that whilst it was a charging modification (which if approved would require change to aspects of section 14 – Charging Methodologies of the CUSC) there are in fact some minor references outside section 14 of the CUSC that would require change should CMP244 be approved. However these could not be addressed via CMP244 as it is a charging modification seeking to amend Section 14 of the CUSC and therefore will be assessed against the Applicable Charging Objectives. Any modifications to the CUSC outside of Section 14 – Charging Methodologies are assessed against the CUSC Objectives (not Charging).
- 2.3 At the CMP256 Workgroup, members agreed to proceed to Workgroup Consultation with their proposal to align the changes to Section 3 and 11 (CMP256) with those to Section 14 (CMP244), and to seek views from industry on their proposed approach via this Workgroup Consultation.
- 2.4 The Workgroup noted that this modification does not deal with the defect and proposals identified in CMP244, but rather the consequential changes required to Sections 3 and 11 of the CUSC if CMP244 is approved. Any implementation for CMP256 would be conditional and dependent on the implementation of CMP244, with the aim to implement both modifications on the same day (if approved by the Authority).

Impacts on the CUSC Sections 3 and 11 arising from CMP244

- 2.5 The consequential changes identified in CMP244, which are dependent on the final form of CMP244 are as follows, and are covered by the Original Proposal are as follows:

CUSC Section 3.14.3 (Use of System)

- 2.6 Section 3.14.3 needs alteration if CMP244 modification is passed; currently the legal text states "*The Company shall give the User not less than 2 months prior written notice of any revised charges*". Should CMP244 be approved, Section 3.14.3 would need to be changed to reflect the final revised notice period agreed by the CMP244 Proposer or any alternative proposals agreed by the CMP244 Workgroup.
- 2.7 The final form of changes to Section 3.14.3 will be dependent on the solution decided by CMP244.

CUSC Section 11 (Interpretation and Definitions)

- 2.8 Section 11 currently defines the TNUoS tariff forecasting timetable as 'an annual timetable prepared and published by The Company by the end of January of each Financial Year (t) which sets out when The Company will publish updates in Financial Year (t+1) (being not less than quarterly) to the forecast of Transmission Network Use of System Charges for the Financial (t+2)'.
2.9 Should CMP244 be approved, Section 11 would need to change to reflect the final revised forecasting timetable agreed as part of CMP244.
- 2.10 If any other consequential CUSC changes (outside of Section 14) are required by CMP244, these will also be included within CMP256.

3 Impacts and Implementation

Proposed Implementation and Transition

- 3.1 It is proposed to make any changes under CMP256 conditional upon, and at the same time as, those implemented to Section 14 under CMP244. The result is that all sections of the CUSC will be updated concurrently to reflect any change in the TNUoS notice period.
- 3.2 Details of the Proposed Implementation and Transition for CMP244 were detailed in the Workgroup Consultation².

Impact on the CUSC

- 3.3 The changes to the CUSC required by this modification are those to Section 3 and 11, consequential on CMP244.

CUSC	3.14.3	" The Company shall give the User not less than 2 months prior written notice of any revised Transmission Network Use of System charges"
	Section 11	Definition of tariff forecast timetable: requirement to publish 4 quarterly forecasts in t-1

Impact on Greenhouse Gas Emissions

- 3.4 None identified.

Impact on Core Industry Documents

Changes to the System Operator / Transmission Owner Code (STC)

- 3.5 Changes to the STC have been highlighted in the CMP244 Workgroup Consultation. There are no further changes required as a result of this modification.

Changes to Transmission Owner licences

- 3.6 Changes to the Transmission Owner licences have been highlighted in the CMP244 Workgroup Consultation. There are no further changes required as a result of this modification.

Impact on other Industry Documents

- 3.7 None identified.

² CMP244 Workgroup Consultation:
<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=43484>

4 How to respond to the consultation

- 4.1 This Workgroup is seeking the views of CUSC Parties and other interested parties in relation to the issues noted in this document, and specifically in response to the questions highlighted in the report and summarised below:

Standard Workgroup Consultation questions:

- Q1:** Do you believe that CMP256 proposal (Potential consequential changes to the CUSC as a result of CMP244) better facilitates the Applicable CUSC Objectives?
- Q2:** Do you support the proposed implementation approach?
- Q3:** Do you have any other comments?
- Q4:** Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider?

- 4.2 Please send your response using the response proforma which can be found on the National Grid website via the following link: <http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/CUSC/Modifications/CMP256/>

- 4.3 In accordance with Section 8 of the CUSC, CUSC Parties, BSC Parties, the Citizens Advice and the Citizens Advice Scotland may also raise a Workgroup Consultation Alternative Request. If you wish to raise such a request, please use the relevant form available at the weblink below:

http://www.nationalgrid.com/uk/Electricity/Codes/systemcode/amendments/forms_guidance/

Views are invited upon the proposals outlined in this report, which should be received by **5pm on Tuesday 15th December 2015**. Your formal responses may be emailed to: cusc.team@nationalgrid.com

- 4.4 If you wish to submit a confidential response, please note that information provided in response to this consultation will be published on National Grid's website unless the response is clearly marked "Private & Confidential", we will contact you to establish the extent of the confidentiality. A response marked "Private & Confidential" will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the CUSC Modifications Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.
- 4.5 Please note an automatic confidentiality disclaimer generated by your IT System will not in itself, mean that your response is treated as if it had been marked "Private and Confidential".

Annex 3 – Workgroup attendance register

A – Attended

X – Absent

O – Alternate

D – Dial-in

Name	Organisation	Role	01/12/15
Nikki Jamieson	National Grid	Chair	A
Jade Clarke	Code Administrator	Technical Secretary	A
Binoy Dharsi	EDF Energy	Proposer	A
Juliette Richards	National Grid	Workgroup member	A
Karl Maryon	Haven Power	Workgroup member	A
William Chilvers	ESB	Workgroup member	A
James Anderson	Scottish Power	Workgroup member	A
Garth Graham	SSE	Workgroup member	A
Jonathan Wisdom	RWE NPower	Workgroup member	O
Lin Gao	E.On	Workgroup member	X
Christopher Granby	Infinis	Workgroup member	A
Joseph Underwood	Drax Power	Workgroup member	X
Andy Manning	British Gas	Workgroup member	O
Edda Dirks	Ofgem	Observer	A