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Abid Sheikh
Industry Codes Manager
Ofgem
By email

29 June 2015

Dear Abid

**CUSC Modifications Panel Views on Urgency for CMP245 and CMP246
'Introduction of a new 'category 5 Intertripping Scheme' to include System to
System intertrips in relation to One-off Charges'.**

On 17th June 2015, Tullymurdoch Ltd raised CMP245 and CMP246, with a request for the proposal to be treated as an Urgent CUSC Modification Proposal. The CUSC Modifications Panel ("the Panel") considered CMP45, CMP246 and the associated request for urgency at the CUSC Modifications Panel meeting held on 26th June 2015. This letter sets out the views of the Panel on the request for urgent treatment and the procedure and timetable that the Panel recommends.

Request for Urgency

The Panel considered the request for urgency with reference to Ofgem's Guidance on Code Modification Urgency Criteria. The majority view of the Panel is that CMP245 and CMP246 should NOT be treated as an Urgent CUSC Modification Proposal.

- Noting the relationship to the suggested change to the Grid Code (where urgency is not currently an option), requesting urgency on CMP245 and CMP246 may shorten the Workgroup process with no apparent benefit.
- The issue is complex and should be developed properly within a Workgroup without rushing the process.

In the discussion, members of the Panel also noted a few concerns over granting urgency, set out below;

- Using an urgent process holds an inherent risk of unintended consequences, which may arise due to there being insufficient time for all aspects of a Modification Proposal to be considered;
- Urgency creates a situation with short consultation periods, as much as possible should be done to inform relevant parties of when these consultations will be issued.

Procedure and Timetable

Having decided not to recommend urgency to Ofgem, the Panel discussed an appropriate process for CMP245 and CMP246. The Panel agreed that CMP245 and CMP246 would require a Workgroup and subject to Ofgem's decision on Urgency should following the standard four month Workgroup process. The Panel requested

for the Modification to be developed as quickly as practicable within this process, with the option of the Workgroup reporting back to the Panel in three months.

The Panel Members agreed that the attached timetable should be used.

Please do not hesitate to contact me if you have any questions on this letter or the proposed process and timetable. I look forward to receiving your response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Toms', with a stylized flourish at the end.

Michael Toms
CUSC Panel Chair

Appendix: Proposed timetable

17 th June 2015	CUSC Modification Proposal and request for Urgency submitted
26 th June 2015	CUSC Panel considers Proposal and request for Urgency
26 th June 2015	Request for Workgroup members (5 Working days)
29 th June 2015	Panel's view on urgency submitted to Ofgem for consideration
2 nd July 2015	Ofgem view on urgency provided
W/C 20th July 2015	Workgroup meeting 1
W/C 3rd Aug 2015	Workgroup meeting 2
20th August 2015	Workgroup Consultation issued (15 Working days)
11th September 2015	Deadline for responses
W/C 14th September 2015	Workgroup meeting 3
28th September 2015	Workgroup meeting 4
22nd October 2015	Workgroup report issued to CUSC Panel
30th October 2015	Workgroup report presented to CUSC Panel
4 th November 2015	Code Administrator Consultation issued
25 th November 2015	Consultation closes
30th November 2015	Draft FMR published for industry comment
7th December 2015	Deadline for comments
10th December 2015	Draft FMR issued to Panel
18th December 2015	Panel Recommendation Vote
21st December 2015	Final FMR circulated for Panel comment
6th January 2016	Deadline for Panel comment
8th January 2016	Final report sent to Authority for decision
12th February 2016	Indicative Authority Decision due
26th February 2016	Implementation Date