

Connection and Use of System Code (CUSC)

Title of the CUSC Modification Proposal
Legal text amendments to CUSC to align with CMP235/6 intentions
Submission Date
17/09/15
Description of the Issue or Defect that the CUSC Modification Proposal seeks to address
<p><i>The current wording in section 11 of the CUSC may result in an Interruption which should be classed as Relevant and therefore receive an Interruption payment as intended under CMP236, being refused.</i></p> <p><i>The definition of an Associated Export BM Unit is;</i></p> <p>an Export BM Unit where:</p> <ul style="list-style-type: none">(i) that Export BM Unit and an Import BM Unit are comprised in the User's Equipment are both registered as being associated with each other in respect of and listed (in the case of the Import BM Unit being referred to as a "Station BM Unit") in Appendix C of the same Bilateral Connection Agreement; and <p>the Import BM Unit is Deenergised and as a direct consequence of the Deenergisation of the Import BM Unit the Export BM Unit is also Deenergised;</p> <p><i>The above works when each Station Transformer has a separate BM Unit assigned to it. However there are instances where a Power Station's Station Transformers are grouped together in one Import BM Unit. The Import BM Unit as a whole may not be 'Deenergised' if only part of the Users equipment within that BM Unit is 'Deenergised' (i.e. one Station Transformer). However the Deenergisation of that individual Station Transformer may lead to that Power Station not being able to generate, which CMP236 states should be classed as a Relevant Interruption. However if the Import BM Unit is not Deenergised (i.e. can still partially Import) then the wording in section 11 could be interpreted so that the Interruption is not classed as Relevant.</i></p> <p><i>Also within the definition above it states "(in the case of the Import BM Unit being referred to as a "Station BM Unit") in Appendix C of the same Bilateral Connection Agreement;</i></p>

Not all Import BM Units are referred to as “Station BM Unit’s” within Appendix C of the BCA’s with no obvious standard naming convention consistently applied. The above legal text implies that if the Import BM Unit is not referred to as a “Station BM Unit” then again this may lead to instances where Relevant Interruptions under the intention of CMP235/6 does not lead to a payment.

Description of the CUSC Modification Proposal

This proposal seeks to change the description of an “**Associated Export BM Unit**” within section 11 of so that it is clear that an Import BM Unit will be treated as being Deenergised if a User’s Equipment within that BMU is Deenergised (i.e. one Station Transformer), and to remove the reference to Station BM Unit in the description to allow for the variances of the naming of Import BM Units in the BCA’s. The proposed legal text is as follows below which still retains the intent but removes any ambiguity.

that **Export BM Unit** and an **Import BM Unit** are comprised in the **User’s Equipment** and are both ~~registered as being associated with each other in respect of and~~ listed ~~(in the case of the Import BM Unit being referred to as a “Station BM Unit”)~~ in **Appendix C** of the same **Bilateral Connection Agreement**; and

the **Import BM Unit** is **Deenergised** (where the **User’s Equipment** which forms part of the **Import BM Unit** contains more than one **Station Transformer** the **Import BM Unit** will be treated as **Deenergised** for the purposes of calculating **Interruption Payments** if one or more **Station Transformers** is **Deenergised**) and as a direct consequence of the **Deenergisation** of the **Import BM Unit** the **Export BM Unit** is also **Deenergised**;

Impact on the CUSC

Section 11

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)

Urgency Recommended: No
Justification for Urgency Recommendation
N/A
Self-Governance Recommended: Yes
Yes
Justification for Self-Governance Recommendation
<i>This modification proposal looks to reword the legal text so that it aligns with the intentions of CMP235/6. It is not seeking to change anything which has not already been consulted on and approved by Ofgem and will therefore align it to the baseline. You can argue that it does have a material effect but only when compared to the potential unintended consequences of the current wording, but not when compared to the intention of CMP235/6.</i>
Should this CUSC Modification Proposal be considered exempt from any ongoing Significant Code Reviews?
No
Impact on Computer Systems and Processes used by CUSC Parties:
None
Details of any Related Modification to Other Industry Codes
None
Justification for CUSC Modification Proposal with Reference to Applicable CUSC Objectives:
<i>This section is mandatory. You should detail why this Proposal better facilitates the Applicable CUSC Objectives compared to the current baseline. Please note that one or more Objective must be justified.</i>
Please tick the relevant boxes and provide justification:
<input checked="" type="checkbox"/> (a) the efficient discharge by The Company of the obligations imposed upon it by the Act and the Transmission Licence
<input checked="" type="checkbox"/> (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.

Justification:

- a) National Grid is obliged to comply with Modification Proposals approved by the Authority and the CUSC. Where the two do not align as intended then this leads to inefficiency
- b) Generators pay TNUoS charges to access the National Electricity Transmission System. These costs end up in the final energy cost. By removing the grey areas within the current wording this gives Generators confidence that they will receive payments (as agreed and expected) for when they cannot access the grid through no fault of their own, thus aligning the service with what they have paid for, and helping keep aligned actual costs with forecasted costs thus improving competition.

Additional details

Details of Proposer: (Organisation Name)	National Grid Electricity Transmission (NGET)
Capacity in which the CUSC Modification Proposal is being proposed: (i.e. CUSC Party, BSC Party or "National Consumer Council")	CUSC Party
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	Damian Clough National Grid Electricity Transmission (NGET) 01926656416 Damian.Clough@nationalgrid.com
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	Paul Wakeley National Grid Electricity Transmission (NGET) 01926656416 Paul.Wakeley@nationalgrid.com

Attachments (Yes/No): No

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

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 and copied to 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.