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Abid Sheikh
Industry Codes Manager
Ofgem
By email
31 May 2016

Dear Abid

CUSC Modifications Panel Views on Urgency for CMP265 'Gross charging of TNUoS for HH demand where embedded generation is in Capacity Market'

On 26 May 2016, EDF Energy raised CMP265, with a request for the proposal to be treated as an Urgent CUSC Modification Proposal. The CUSC Modifications Panel ("the Panel") considered CMP265 and the associated request for urgency at the CUSC Modifications Panel meeting held on 27 May 2016. 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 CMP265 should NOT be treated as an Urgent CUSC Modification Proposal.

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

- This modification is considered complicated and cannot be addressed fully by the Workgroup using an urgent process. Following an urgent timetable 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.

Procedure and Timetable
Having decided not to recommend urgency to Ofgem, the Panel discussed an appropriate process for CMP265. The Panel agreed that CMP265 would require a Workgroup. They also agreed by majority that whilst the proposal does not strictly meet Ofgems urgency criteria, there is a benefit of implementing the modification as soon as possible and aligning it to the development of the **CMP264 'Embedded Generation Triad Avoidance Standstill'** which was also raised and discussed at the CUSC Panel on 27 May 2016. Therefore, subject to Ofgem's decision on Urgency, they decided that the modification process should follow a reduced timetable as set out in the Appendix.

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

Michael Toms
CUSC Panel Chair

Appendix: Proposed timetable

17 May 2016	CUSC Modification Proposal submitted
27 May 2016	CUSC Modification tabled at Panel meeting
31 May 2016	Request for Workgroup members (5 Working days)
W/C 13 June 2016	Workgroup meeting 1
W/C 20 June 2016	Workgroup meeting 2
W/C 4 July 2016	Workgroup meeting 3
18 July 2016	Workgroup Consultation issued (15 Working days)
8 August 2016	Deadline for responses
11 or 12 August 2016	Workgroup meeting 4
15 or 16 August 2016	Workgroup meeting 5
18 August 2016	Workgroup report issued to CUSC Panel
26 August 2016	CUSC Panel meeting to discuss Workgroup Report
30 August 2016	Code Administrator Consultation issued (10 Working days)
13 September 2016	Deadline for responses
15 September 2016	Draft FMR published for industry comment (5 Working days)
22 September 2016	Deadline for comments
23 September 2016	Draft FMR circulated to Panel (late paper)
30 September 2016	CUSC Panel Recommendation vote
5 October 2016	FMR circulated for Panel comment (3 Working days)
10 October 2016	Deadline for Panel comment
12 October 2016	Final report sent to Authority for decision
26 October 2016	Indicative Authority Decision due (10 Working days)
2 November 2016	Implementation date (5 Working days later)