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Abid Sheikh
Industry Codes Manager
Ofgem
By email

2 August 2016

Dear Abid

CUSC Modifications Panel Views on Urgency for CMP268 'Recognition of sharing by Conventional Carbon plant of Not-Shared Year-Round circuits'

On 26 July 2016, SSE raised CMP268, with a request for the proposal to be treated as an Urgent CUSC Modification Proposal. The CUSC Modifications Panel ("the Panel") considered CMP268 and the associated request for urgency at the CUSC Modifications Panel meeting held on 29 July 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.

CMP268 proposes to change the charging methodology to more appropriately recognise that the different types of "Conventional" generation do cause different transmission network investment costs, which should be reflected in the TNUoS charges that the different types of "Conventional" generation pays ideally ahead of the December Capacity Auction.

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 CMP268 does not meet these criteria and SHOULD NOT be treated as an Urgent CUSC Modification Proposal.

The Panel concluded that the Proposal did not relate to an imminent issue and although the proposal seeks to address an existing issue in the CUSC resulting from the implementation of CMP213, CMP268 will require careful consideration and is potentially more complex than envisaged by the Proposer and therefore not achievable within the timescales.

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

- The Panel recognised analysis presented within the CMP213 Final Modification Report could be re-used by a Workgroup but agreed that this would need to be refreshed to bring it up to date.
- 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;
- There are complex issues identified by the Panel that need to be considered by a Workgroup.

Procedure and Timetable
Having decided to not recommend urgency to Ofgem, the Panel discussed an appropriate process for CMP268. The Panel agreed that the CMP268 proposal would require a Workgroup and careful consideration due to the potential implications against principles agreed during the implementation of CMP213.

The Panel agreed that CMP268 subject to Ofgem's decision on Urgency should follow the attached Code Administrators proposed timetable (Appendix 1). This was supported by majority view.

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 1 – Indicative Workgroup Timetable (Standard)

The following urgent timetable is following is indicative for CMP268 as per the recommendation of the Code Administrator

27 July 2016	CUSC Modification Proposal and request for Urgency submitted
29 July 2016	CUSC Panel meeting to consider proposal and urgency request
2 August 2016	Panel's view on urgency submitted to Ofgem for consultation
2 August 2016	Request for Workgroup members (5 Working days) (responses by 9 August 2016)
9 August 2016	Ofgem's view on urgency provided (5 Working days)
w/c 8 September 2016	Workgroup meeting 1
w/c 3 October 2016	Workgroup meeting 2
w/c 24 October 2016	Workgroup meeting 3
9 November 2016	Workgroup Consultation issued (15 days)
30 November 2016	Deadline for responses
w/c 5 December 2016	Workgroup meeting 4
w/c 19 December 2016	Workgroup meeting 5 (agree WACMs and Vote)
19 January 2017	Workgroup report issued to CUSC Panel
27 January 2017	CUSC Panel meeting to approve WG Report

Post Workgroup modification process

1 February 2017	Code Administrator Consultation issued (15 Working days)
22 February 2017	Deadline for responses
1 March 2017	Draft FMR published for industry comment (5 Working Days)
8 March 2017	Deadline for comments
23 March 2017	Draft FMR circulated to Panel
31 March 2017	Panel meeting for Panel recommendation vote
5 April 2017	FMR circulated for Panel comment (5 Working day)
12 April 2017	Deadline for Panel comment
14 April 2017	Final report sent to Authority for decision
24 May 2017	Indicative Authority Decision due (25 working days)
30 May 2017	Implementation date