

CUSC Panel

26 October 2018

National Grid House, Gallows Hill,
Warwick

Welcome



nationalgridESO

Housekeeping

Fire alarms

Facilities

Red Lanyards



Introductions and Apologies

Apologies

None Received

Observers

Rachel Hinsley (Code Administrator)



Approval of Panel Minutes

28 September
2018

Actions Log



New Modifications

**CMP308 –
Removal of
BSUoS Charges
from Generation**

**Simon Vicary,
EDF Energy**



CMP308

Removal of BSUoS charges from Generation

26th October 2018



Summary

- We are concerned about the **current market arrangements not ensuring fair competition** between GB and other interconnected countries so have been considering options for reform.
- We are considering **raising a CUSC mod to only levy BSUoS on demand**, i.e. reconsider CMP201 in the light of new evidence and changed circumstances, as other interconnected countries in general levy similar costs solely on demand.
- This is **critical in the context of GB interconnection growth** which is set to significantly increase (4GW today, 8GW by 2020 - and, with Ofgem's approved pipeline, up to 18GW by early 2020s).
- **Ofgem broadly supported CMP201** but considered the short-term consumer negative impact outweighed the longer term benefits:

"We consider that in principle, removing BSUoS from generators would have a small positive impact on competition. However, we are concerned that at this time the potential benefits this would bring would not be material enough to offset the potential costs to consumers from implementing the modification" - Ofgem decision Oct14

- **NGET's calculations**, on which Ofgem's decision was based, were that CMP201 would be detrimental to consumers - but **did not take into account the impact of CMP202** (Revised treatment of BSUoS charges for lead parties of Interconnector BM Units), so:
 - CMP201 modelling (for status quo) assumed BSUoS was split 50:50 between demand and generation.
 - As a result of CMP202 the G:D split for BSUoS charging in 2017 was around 49:51 and expected to be 47:53 by 2020.
 - This reduces the cost increase for suppliers to a value that is roughly equal to the reduction in GB wholesale prices.
- Our **modelling indicates that this change will leave GB consumers neutral** in the short term **with the potential for longer term consumer benefits from competition**.



Defect in current arrangements

- In our European trading partners and other interconnected countries the **equivalent charges for balancing activities are more commonly paid entirely by suppliers.**
 - As a result, the wholesale prices offered by generators in interconnected countries will not reflect these costs in the same way as those offered by a GB generator. (Our estimate is that GB generation is disadvantaged by the extra cost **~£600m in 2017**)
- Our proposal seeks to remove BSUoS charges from GB Generators, thereafter recovering all BSUoS from GB Suppliers. In doing so, it seeks to better facilitate **efficient competition between GB generation and generation in other interconnected markets.**
 - Better aligning the GB market arrangements and the charges faced by GB generation with those prevalent in other interconnected countries, where generation is typically not subject to such charges, allows GB and continental generation to **compete on a more equitable basis** and **removes the potential for BSUoS to distort cross border trade.**
 - **Supports the UK Industrial Strategy** for building a nation fit for the future with investment in skills, industries and infrastructure.
- The EU “Third Package” aims to deliver all consumers greater choice with more cross-border trade so as to achieve efficiency gains, competitive prices and security of supply.
 - It recognises that different market structures will exist, however it also acknowledges the need for fair competition across the European Community so as to provide producers with the **appropriate incentives for investing in new generation.**
 - Changing the GB arrangements as proposed thus facilitates the aims outlined in EU Directive 2009/72/EC concerning rules for the internal market in electricity.



Consumer benefits of change

- The proposed CUSC mod **better facilitates code objectives** (a) effective competition, (c) developments in transmission business and (d) EU compliance. It is neutral on (b) cost reflectivity.
- Consumer cost impact
 - demand BSUoS will be less than double of current BSUoS £/MWh rates as interconnector flows to GB do not pay BSUoS (i.e. split of BSUoS between demand and generation is not currently 50:50), i.e. **consumers neutral short term**.
 - sufficient **lead time of 2 years** after a decision is made to ensure
 - wholesale market adjusts to the removal of BSUoS from generation.
 - time for consumers and suppliers to adjust for change.
 - **benefit of avoiding** the need to factor **BSUoS risk** into generation/wholesale market costs, instead being covered within more predictable demand volumes.
- In the **long run** removal of a distortion in the wholesale market will ensure more effective competition which is in **consumers' interests**: i.e. will ensure investment in new generation is more efficient.



How does this BSUoS change fit with other reforms?

1. Ofgem's RAFLC:

- Proposes National Grid review of BSUoS costs to confirm whether they are 'cost recovery' or contain pricing signals
- Grid to lead review outside of SCR
- Timescales tbc

2. Ofgem's TCR:

- Considers addressing current BSUoS embedded benefit
- Impacts distribution connected generators
- Ofgem policy decision late 2018; industry mod to follow
- Apr 2020+

3. EDF Energy's BSUoS mod:

- Proposes to recover BSUoS costs from demand; reducing production costs to zero
- Industry code process
- 6 months process with 2 year implementation period, i.e. April 2021

Affects size of BSUoS by potentially changing scope (e.g. could determine some elements are price signals)

Affects how BSUoS is charged (e.g. could change to gross volumetric impacting embedded benefits)

Affect who pays BSUoS (i.e. change demand recovery to 100%)

CMP250 fixes BSUoS charges for long period to provide certainty to users.
This change is independent of the 3 above but appears more sensible if demand pays 100% of BSUoS.

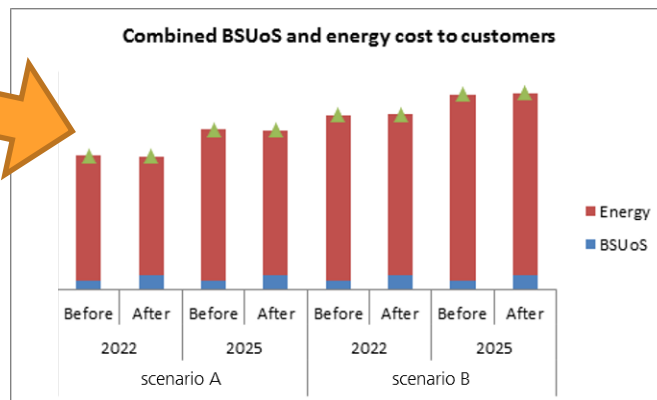
CMP281 proposes to exempt import or export BSUoS costs from storage assets;
designed to align storage assets with generation

- **These are 3 separate policy considerations which can be progressed in parallel.**
- **The conclusion of 1) may impact the BSUoS "pot" but is unlikely to change the scale of materiality and urgency.**
- **National Grid should undertake a targeted 6 month review of BSUoS elements (Oct-March) to support overall timescale for BSUoS reforms**

CMP201 Modelling revisited

- An assumption of CMP201 was that BSUoS charges were split 50:50 between production and demand.
- Following CMP202 the production volume from interconnection is no longer liable for BSUoS charges and thus this assumption no longer held
- This assumption affects the modelled consumer impacts in the short-term identified by National Grid's modelling
- Revising this assumption means that the consumer impacts in the short-term are close to neutral
- The longer term benefits from more effective competition will remain.

The case for change has grown since CMP201:			
	Interconnection (GW)	Interconnection volume (TWh)	BSUoS (£/MWh)
CMP201 (2012)	3GW (2GW to mainland EU)	10	£1.51/MWh
Now (2017)	4GW (3GW to mainland EU)	16	£2.48/MWh
Future	c.8GW 2020 c.18GW early 2020s	30-70TWh (2021-2025) ¹	Growing



¹ - BEIS, Updated Energy & Emissions Projections 2017 (January 2018) – Figure 5.1
<https://www.gov.uk/government/publications/updated-energy-and-emissions-projections-2017>



Next Steps:

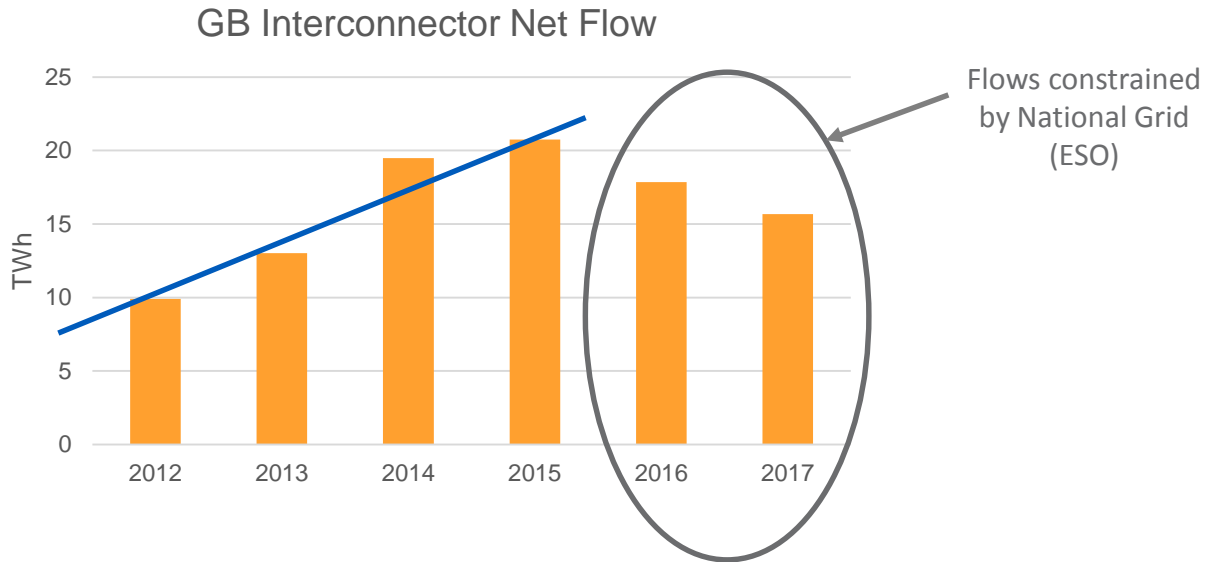
- 26th October 2018 – CUSC Panel
- Q4 2018/Q1 2019 - Workgroup
- H1 2019 – Ofgem decision
- Implementation – 2 years after Ofgem decision to give notice to market



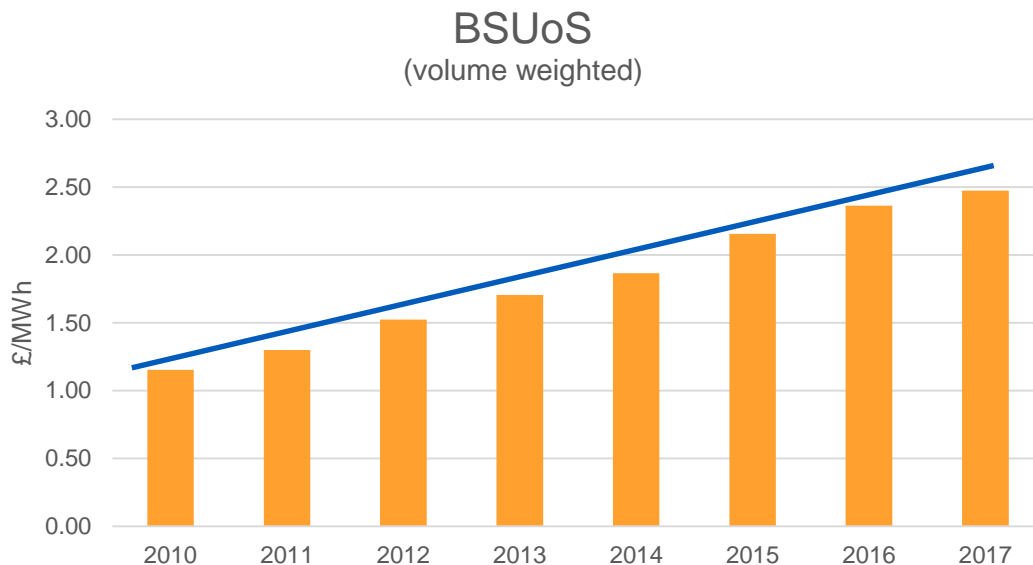
Appendix



Change in interconnector flows since 2012



Historical BSUoS



Impact of BSUoS charged solely on GB demand

- Based on actual 2017 BSUoS data and modelling of interconnector flow changes the table below shows the estimated impact if BSUoS had been charged solely on GB demand.

	2017 Actual data	2017 with change implemented
Increase of GB generation due to proposed change (TWh)	0	2.1
GB chargeable BSUoS volume (TWh)	502.5	504.6
net imports (TWh)	15.7	13.6
Total GB demand (TWh)	259.1	259.1
BSUoS 2017 average (£/MWh)	2.48	2.46
Total BSUoS cost (£m)	1,243.9	1,243.9
BSUoS if charged 100% on demand (£/MWh)	4.80	4.80
Double current BSUoS rate (£/MWh)	4.95	4.95
Delta of BSUoS rate (£/MWh)	0.15	0.15
Minimum Wholesale Market fall to maintain status quo (£/MWh)	2.33	2.33
Consumer impact (£/MWh)		0.00
Consumer impact (£m)		0.0



Note: the minimum Wholesale Market decrease to maintain status quo is 15p/MWh less than the generation BSUoS rate.

Embedded Generation

- The impact on embedded generation of moving BSUoS recovery solely onto GB demand is expected to be neutral, as shown in the table below.

	£/MWh
BSUoS embedded benefit increase	2.33
Wholesale Market decrease*	2.33
Net Embedded Generator impact	0.00

*Wholesale Market decrease to maintain status quo





Authority Decisions

Nadir Hafeez,
Ofgem

In Flight Modifications

Joseph Henry,
Code
Administrator
Representative



CMP280 and CMP281

Developments Since Last Panel

- **CMP281 is out for Workgroup Consultation – Input by 12 November 2018**
- **3 workgroups to be held in w/c 12,19 and 26 November to make up for lost time**

Modification Description: CMP280: The Modification aims to remove liability from Generator and Storage Parties for the Demand Residual element of the TNUoS tariff.

CMP281: The Modification aims to remove liability from storage facilities for Balancing Services Use of System (BSUoS) charges on imports.

CMP285

Developments Since Last Panel

- Workgroup Meeting Held 25 October 2018
- 10 WACMs raised

Modification Description: CMP285 - This modification seeks to reform CUSC governance to enhance the independence and diversity of Panel members and ensure wider engagement from CUSC signatories.

CMP286 and CMP287

Developments Since Last Panel

- Workgroup last held 17 September
- Workgroup finalised W/G Consultation
- Workgroup Consultation to be published by Code Administrator on 31 October 2018 for 15 Working Days
- Workgroup to be held in December
- The Code Administrator request a three month extension – report was due back today after extension granted at April's Panel (Minute 7360)

Modification Description: CMP286 - This modification seeks to improve the predictability of TNUoS demand charges by bringing forward the date at which the target revenue used in TNUoS tariff setting is fixed to allow customer prices to more accurately reflect final TNUoS rates.

CMP287: Seeks to improve the predictability of TNUoS demand charges by bringing forward the date at which certain parameters used in TNUoS tariff setting (such as demand forecasts) are fixed to allow customer prices to more accurately reflect final TNUoS rates

CMP288 and CMP289

Developments Since Last Panel

- **Code Administrator to hold Webex in order publish Workgroup Consultation within next 5 working days**
- **An extension of 1 month is requested. Workgroup Report due back for December based on current timelines.**

Modification Description: CMP288 - This modification seeks to introduce explicit charging arrangements to recover additional costs incurred by Transmission Owners and TNUoS liable parties as a result of transmission works undertaken early due to a User initiated delay to the Completion Date of the works, or to facilitate a backfeed

CMP289: Seeks to introduce changes to non-charging sections of the CUSC to support the introduction of explicit charging arrangements to recover additional costs incurred by Transmission Owners and TNUoS liable parties as a result of transmission works undertaken early due to a User initiated delay to the Completion Date of the works, or to facilitate a backfeed. The changes to the charging element of the CUSC are covered under CMP288.

CMP291

Developments Since Last Panel

- 2nd Workgroup to be held over 2 days with GC0117 on 11 October 2018
- Next Workgroup TBC in November

Modification Description: CMP291 - This modification seeks to introduce The open, transparent, non discriminatory and timely publication of the harmonised rules for grid connection (in accordance with the RfG, DCC and HVDC) and the harmonised rules on system operation (in accordance with the SOGL) set out within the Bilateral Agreement(s) exhibited in the CUSC.

This modification will set out within the CUSC the obligations in the EU Connection Network Codes and System Operation Guideline as they relate to the harmonised rules for connection and system operation in GB

Developments Since Last Panel

- 1st Workgroup due to be held on 02 October 2018 – postponed due to lack of quoracy
- Doodle poll sent out to ascertain availability for working groups to be sent 26 October 2018
- Workgroup report due for January 2019. Extension may be asked for at next Panel.

CMP292 - The purpose of this modification is to ensure that the charging methodologies (all Charging Methodologies as defined in the CUSC) are fixed in advance of the relevant Charging Year to allow The Company – as Electricity System Operator - to appropriately set and forecast charges. Introducing a cut-off date for changes to the methodologies will help to reduce the risk of charges out-turning differently to the forecasts produced by the Company and created by Users.

CMP293 and CMP294

Developments Since Last Panel

- **CMP293 and CMP294 will be sent to the Authority for decision in line with Legal Separation changes from other codes, as per the request of the Authority.**

Modification Description: CMP293 - This proposal seeks to modify the CUSC to reflect the creation of a new National Grid Electricity System Operator (NGESO) that is legally separated from National Grid Electricity Transmission Limited (NGET). The specific CUSC references have been updated in order to ensure the System Operator and Transmission Owner obligations are clear.

CMP294: This proposal seeks to modify the CUSC to reflect the creation of a new National Grid Electricity System Operator (NGESO) that is legally separated from National Grid Electricity Transmission Limited (NGET). The specific CUSC references have been updated in order to ensure the System Operator and Transmission Owner obligations are clear

CMP295

Developments Since Last Panel

- 1st Workgroup held on 17 October 2018
- Positive progress made, second workgroup planned for early December
- The Code Administrator would like to ask panel for a 2 month extension today, Workgroup Report was initially due for December (As agreed at May's Panel)

CMP295: Under BSC P344 and GC0097, and future market arrangements, an aggregator will combine the export capabilities of SVA-registered embedded generation to participate in the BM. In order to facilitate Grid Code compliance, and to ensure appropriate rights/obligations for Virtual Lead Parties (as to be defined in BSC P344), accession to the CUSC is necessary and entry into specific CUSC contracts is required.

CMP296 and CMP297

Developments Since Last Panel

- **CMP296 and CMP297 are awaiting Authority Decision**
- **Modifications were sent to Ofgem in July 2018**

Modification Description: CMP296- P344 introduces a new class of BMU, and a new class of BMU registrant to the BSC (“Virtual Lead Parties”); it is necessary to amend the CUSC to expand the BSUoS exemption to these Virtual Lead Parties

CMP297: This proposal seeks to alter Section 14 of the CUSC such that the extant BSUoS exemption which applies to Interconnector BMUs can be expanded to cover Virtual Lead Parties. This consequential CMP seeks to amend Section 11 to introduce a definition of ‘Virtual Lead Party’

CMP298

Developments Since Last Panel

- 1st Workgroup held 02 October 2018
- 2nd workgroup date TBC, to be held in November

Modification Description: CMP298 - Due to increasing levels of embedded generation connections the process for assessing their overall impact on the transmission system needs to be revised allowing the System Operator to recognise the changes caused by multiple small scale connections and plan accordingly.

CMP300

Developments Since Last Panel

- Modification on hold until December as per Panel decision

Modification Description: CMP300 - To ensure that the Response Energy Payment paid to or by generators with respect to a BM Unit with low or negative marginal costs is reflective of the cost or avoided cost of energy production.

CMP301

Developments Since Last Panel

- **CMP301 is with the Authority for Decision**
- **This was sent to the Authority on 8 August 2018**

Modification Description: CMP301 – CMP213 introduced specific expansion factors for HVDC and subsea circuits however the existing legal text is open to interpretation – this proposal would cement the interpretation made by The Company to ensure consistency with onshore circuits

Developments Since Last Panel

- Workgroups 2 and 3 will be held in Glasgow due to geographic proximity to vast majority of Workgroup members on 29 and 30 October 2018

Modification Description: This modification seeks to make part of the TNUoS charge more cost-reflective through removal of additional costs from local circuit expansion factors that are incurred beyond the connected, or to-be-connected, generation developers' need.

CMP304

Developments Since Last Panel

- Initial Start Off Meeting held 27 September 2018
- 1st WG to be arranged in early November 2018

Modification Description: CMP304 looks to improve the Enhanced Reactive Power Service, making it “fit for purpose”

CMP305

Developments Since Last Panel

- Code Administrator Consultation closes today at 5pm

Modification Description: CMP305 looks to remove the Enhanced Reactive Power Service

CMP306

Developments Since Last Panel

- Workgroup members being sourced
- Kick off meeting to be held in November

Modification Description: CMP306 The purpose of this modification is to align the rate of return applied to the net asset value of connection points in the calculation of annual connection charges (as set out at paragraph 14.3.21 of the Connection Charging Methodology) to the pre-tax cost of capital in the price control of the Relevant Transmission Licensee (plus a margin of 1.5 percentage points in the case of MEA-linked assets). This will improve the cost reflectivity of the charges, since the return on capital will equal the Authority's most recent assessment of that cost for the Relevant Transmission Licensee.

CUSC Modifications

Plan on a Page and other CUSC Panel related material can be accessed using the following link:
<https://www.nationalgrid.com/uk/electricity/codes/connection-and-use-system-code/meeting-docs>

With Authority, awaiting decision – please refer to the following link for further information:
https://www.ofgem.gov.uk/system/files/docs/2017/04/indicative_decision_dates_for_modification_with_ofgem.pdf

CMP251 - Remove error margin cap on TNUoS compliance with EU (British Gas)

WG - Workgroup
 ConS - Consultation
 WG ConC - Workgroup Conclusion
 CA - Code Administrator Consultation
 DRMR - Draft Final Modification Report
 * Timetable at risk/to be confirmed by Panel

	October	November	December	January	February	March	April
Modifications							
*CMP271 - Improving the cost reflectivity of demand to charges (RWD) and CMP274 - Winter TNUoS Time of Use Tariff for Demand TNUoS (UK Power Reserve) and CMP276 - Socialising T costs associated with "green policies" (Alkane)	WG Mod Dev on hold pending outcome from SCR/TCR						
CMP280 - New Generator TNUoS Demand Tariff which Removes Liability for TNUoS Demand Residual Charges from Gen and Storage Users' and CMP281 - Removal of BSUoS Charges From Energy Taken From the National Grid System by Storage Facilities (Scottish Power)	WG ConS	WG ConC		CA ConS			
CMP285 - CUSC Governance Reform - Levelling the Playing Field' (UKPR)	WG	WG ConS	WG ConC		CA ConS		
*CMP286 - Improving TNUoS Predictability Through Increased Notice of the Target Revenue used in the TNUoS Tariff Setting Process. (npower) and CMP287 - Improving TNUoS Predictability Through Increased Notice of Inputs Used in the TNUoS Tariff Setting Process. (npower)	WG Mod Dev				CA ConS		



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CMP288 - Introduce explicit charging arrangements to recover additional costs incurred by Transmission Owners and TNUoS liable parties as a result of transmission works undertaken early due to a User initiated delay to the Completion Date of the works, or to facilitate a backfeed (NGRID) and CMP289 - Consequential change to support the introduction of explicit charging arrangements for customer delays and backfeeds via CMP288.	WG Mod Dev						
CMP291 - Set out within the CUSC the obligations in the EU Connection Network Codes and System Operation Guideline as they relate to the harmonised rules for connection and system operation in GB (SSE)	WG Mod Dev						
CMP292 - Ensure that the charging methodologies are fixed in advance of the relevant Charging Year to allow The Company to appropriately set and forecast charges. (NGRID)	WG Mod Dev						



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CMP 293 National Grid Legal Separation changes to CUSC sections, Exhibits & Schedules (non charging) and CMP 294 National Grid Legal Separation changes to CUSC Section 14	CA ConS	DF MR	◊	With Authority			
CMP295 - Contractual Arrangements for Virtual Lead Parties (Project TERRE)	WG Mod Dev						
CMP296 - Aligning the CUSC to the BSC post-P344 (Project TERRE) to exempt Virtual Lead Parties from BSUoS AND CMP297 - Aligning CUSC and BSC post-TERRE (Section 11) – consequential modification to introduce definition of Virtual Lead Party'.		With Authority					
CMP298 - Updating the Statement of Works process to facilitate aggregated assessment of relevant and collectively relevant embedded generation.	WG Mod Dev						



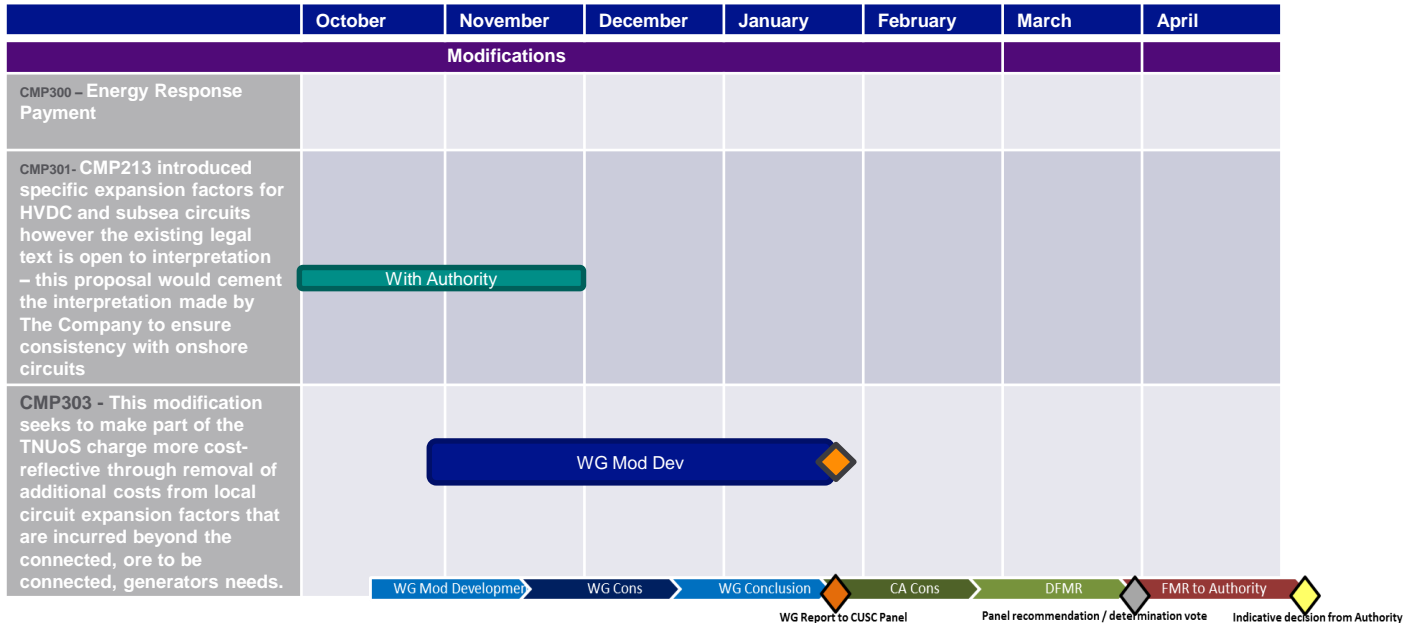
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CMP304 – Enhancing EPRS		WG Mod Dev					
CMP305- Removing EPRS		CA ConS					
CMP306 -		WG Mod Dev					



Prioritisation



RIIO T2 – Code Governance Options

John
Twomey,
National Grid
ESO



Code Administrator Code of Practice Survey Results

Comparison Grid Code 2017 and 2018 results

	Results 2017	Results 2018	Change
Perceived improvements			
Net improved %	-	20	Increase 20%
Net worsened %	-	6	Increase 6 %
Overall satisfaction			
Net satisfied %	59	66	Increase 7%
Net dissatisfied %	7	6	Decrease 1%
Satisfaction with the provision of support			
Net satisfied %	67	73	Increase 6%
Net dissatisfied %	8	6	Decrease 2%
Satisfaction with support received when requested			
Net satisfied %	69	77	Increase 8%
Net dissatisfied %	4	0	Decrease 4%

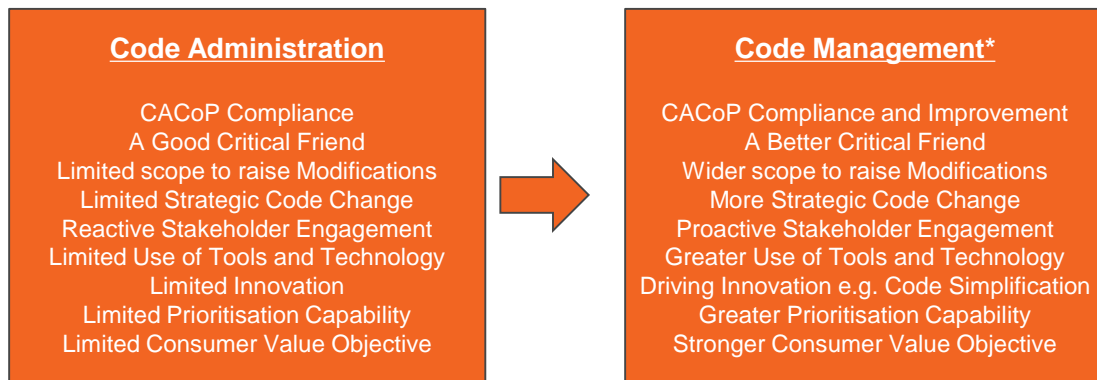
Code Administrator Code of Practice Survey Results

Comparison Grid Code 2017 and 2018 results

	Results 2017	Results 2018	Change
Kept informed about the code			
Net informed %	81	80	Decrease 1%
Net not informed %	19	14	Decrease 5%
Ease of interpreting information from the Code Administrator			
Net easy %	52	60	Increase 8%
Net difficult %	26	14	Decrease 12 %
Relevance of information			
Net relevant %	92	83	Decrease 9%
Net not relevant %	8	10	Increase 2%
Understanding modifications			
Net satisfied %	44	54	Increase 10%
Net dissatisfied %	19	6	Decrease 13%

What does our service transition look like?

- Our 'Customer Journey' Project will enhance the current service we provide in RIIO-T1.
- We believe there is an opportunity to further increase performance and unlock consumer value through Code Management – however the role of a Code Manager remains unclear at this point in time.
- We would welcome your views on our indicative views for the role of a Code Manager in RIIO-2.

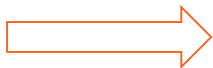


Questions

1. Does this define the high level principles of a code manager?
2. Who do you think is best placed to undertake this role?

Funding model options for a Code Manager?

Funding Mechanism



- Margin based funding
- Incentive based outcomes

Funding duration



- Fixed Funding for the duration of the price control i.e. 5 years
- Annual funding process

Funding Process



- Industry Stakeholder Consultation on outputs / deliverables
- Panel / Ofgem Approval process?
- Panel role in allocating resources / budget

Questions

1. For each of the above areas what are your views?
2. Are there any other important principles we need to capture?

Relevant Interruptions Claim Report

Shazia Akhtar, Code
Administrator



Standing Groups



nationalgridESO

European Code Development



Industry Updates



AOB



nationalgrideso.com

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Gallows Hill, Warwick, CV346DA

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