CMP223 – 'Arrangements for Relevant Distributed Generators Under the Enduring Generation User Commitment'







CUSC Panel – 27th March 2015 Jade Clarke

Background

- CUSC 15 user commitment applies security reductions to reflect lower risk situations
 - E.g. may only require 10% liability to be secured
- NGET applies CUSC 15 to distributed generators (DG) via their DNO (excluding BEGA wider liability)
- DG are not benefiting from security reductions in a number of cases
- DNOs have no mechanism to recover any shortfall between security and liability, and would be exposed to full financial risk of bad debt

Proposed CUSC Modification

CMP223 seeks to modify the CUSC such that distribution connected generators deemed to have an impact on the electricity transmission network are not faced with undue discrimination in the way security requirements under CUSC Section 15 are passed on.

Authority send-back

- On 24th October 2014, the Authority wrote to the CUSC Panel Chair stating their decision to direct that the report on CMP223 is revised and resubmitted.
- A revised FMR should:
 - Provide a detailed overview of the debt collection process and how this would be implemented for the original and alternative proposals.
 - Set out this process in a clear and easy to understand manner so that stakeholders are clear on what would be required of them.
- The Workgroup agree that this is now included within the updated Workgroup Report.

Workgroup Consultation

- 9 responses received to the Workgroup consultation, all supportive of one or more options identified
 - Majority supportive of the alternative options
- No further Workgroup Consultation following Authority send-back.

Workgroup Vote

- 9 Workgroup Members voted
- 4 WACM's proposed
- 7 Workgroup Members voted that CMP223 WACM3 best facilitates the applicable CUSC Objectives
- All Workgroup members confirmed that their vote had not changed following Authority send-back.

Workgroup Conclusions

- Terms of Reference have been met.
- Proposed legal text agreed.
- The Workgroup proposes that CMP223 should be implemented 10 Working Days after an Authority Decision, however consideration should be given to the timing with regards to the six-monthly securities process

Next Steps

- The Panel is invited to:
 - Accept the Workgroup Report
 - Agree for CMP223 to progress to Code Administrator Consultation.

■ The Workgroup suggest that CMP223 should progress to a further Code Administrator Consultation before resubmitting to the Authority.



Proposed Timetable

2 April 2015		Issue CA Consultation
5 May 2015		CA Consultation closes
7 May 2015		Issue draft FMR for comment
14 May 2015		Deadline for comment
21 May 2015		CUSC Panel Papers Day
29 May 2015		Panel vote
2 June 2015		Issue FMR for final comment
9 June 2015		Deadline for comments
11 June 2015		Final Report sent to Authority for decision
16 July 2015		Indicative 25 day KPI for decision
Before 30 Sept 2015	After 30 Sept 2015	CMP223 Implementation in CUSC (if approved)
1 April 2016	1 October 2016	CMP223 Go-live (if approved)