

CMP258 – Rewording of the legal text to align the CUSC with the intentions of CMP235/6



CUSC Panel – 18th December 2015
Damian Clough – National Grid

Background

- Ofgem published its decision on Connection and Use of System Code (CUSC): ‘Introduction of a new Relevant Interruption Type’ (CMP235) and ‘Clarification of when Disconnection Compensation payments can be expected under a Relevant Interruption’ (CMP236)
July 15th 2015
- Implementation **29th July 2015**

Summary of Defect (Past)

- Following Implementation, it was noted that there were some typographical errors in the legal text associated with the Workgroup Alternative implemented (WACM3)
- A customer raised concerns that these errors may prevent future Interruption Payments when under the intention of CMP235/236 these should result in a payment
- Therefore to allay concerns, we felt it appropriate to deal with these errors as soon as possible through the appropriate modifications process as the issues lie within the legal text
- The above concerns were dealt with via CMP252. Implemented **22nd September 2015**

Summary of Defect

- This modification aims to deal with grey areas regarding Station Transformers within the legal text which were not dealt with via the previous fast track modification. We did not believe that these changes met the Fast Track Criteria so were not included in CMP252, and are being dealt with via this further separate modification.
- The legal text currently refers to “Station BM Units” in the BCA. A customer pointed out that in their BCA’s their Import BM Units were not named “Station BM Units”. If their Import BM Unit was not called “Station BM Units” this may result in an Interruption payment not being paid when it was intended to be under **CMP235/236**

Summary of Defect

- Also within the legal text
- If an Import BM Unit (Station Transformer) is Deenergised and this results in the Generation Unit Deenergising this will result in an interruption Payments if the Interruption was Relevant; as intended by CMP235/236
- However an Import BM Unit may contain more than one Station Transformer. Therefore an Import BM Unit may still be taking load (therefore not Deenergised) even when a Station Transformer may have been tripped resulting in an Interruption to Generation.

Withdrawal of CMP253 Modification nationalgrid and Way Ahead

- Following feedback from the consultation response and discussions with various parties CMP253 was withdrawn;
- However it is apparent that;
 - The issue regarding the naming of Import BM Units still remains but is not contentious;
 - There is differing interpretation of what is meant and required by the words “registered and associated”;

Raising of CMP258

- This modification again looks to deal with the naming of Station BM Units
- However different from CMP253
 - Partial Deenergisation of an Import BM Unit will not be considered as this can be dealt with; by registering a separate BM Unit for each Station Transformer
 - The removal of “Registered and Associated” will be removed/defined , due to the wide range and differing interpretations of what is meant by these words; and the resulting actions necessary depending on the accepted interpretations

Justification for Self Governance

Self Governance criteria

- (a) Is unlikely to have a material effect on:*
 - i. Existing or future electricity consumers, and*
 - ii. Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity; and*
 - iii. The operation of the National Electricity Transmission System; and*
 - iv. Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and*
 - v. The CUSC's governance procedures or the CUSC's modification procedures, and*
- (b) Is unlikely to discriminate between different classes of CUSC Parties.*

Justification against Self Governance criteria

Justification for Self Governance

We are not proposing a new type of Interruption or changing how Interruptions are calculated

CMP235/236 has already been consulted on by Industry and Ofgem decided that under WACM3 these types of Interruptions should receive an Interruption payment

This looks to change the legal text so that claims which were expected to receive an Interruption payment will receive one. It will not increase the number of claims over and above what was considered by Ofgem when assessing CMP235/236

Code Administrator Proposed Progression

- The Panel is asked to agree:
 - whether CMP258 should be progressed as Self Governance
 - whether CMP258 should progress to either:
 - WorkgroupOr straight to
 - Code Administrator Consultation

CMP258 Indicative timetable 1 (Self Governance – CA Cons)

5th January 2016	Code Administrator Consultation issued (15 Working days)
26th January 2016	Deadline for responses
2nd February 2016	Draft CUSC Modification Report issued for Industry comment
9th February 2016	Deadline for comment
18th February 2016	Draft CUSC Modification Report issued to CUSC Panel
26th February 2016	CUSC Panel determination vote
26th February 2016	Appeal window opens
18th March 2016	Appeal window closes
21st March 2016	Implementation date (if approved)

CMP258 Indicative timetable 2 (Self Governance - WG)

W/C 11th January 2016	Workgroup meeting 1
25th January 2016	Workgroup Consultation issued
15th February 2016	Deadline for responses
18th February 2016	Workgroup meeting 2
10th March 2016	Workgroup Report submitted to CUSC Panel
18th March 2016	CUSC Panel determination vote
21st March 2016	Code Administrator Consultation issued
11th April 2016	Deadline for responses
12th April 2016	Draft FMR issued to Industry
19th April 2016	Deadline for comment
29th April 2016	CUSC Panel determination vote
23rd May 2016	Appeals window closes
24th May 2016	CMP258 Implemented (if no successful appeals received)

CMP258 Indicative timetable 3 (not Self Governance – CA Cons)

5th January 2016	Code Administrator Consultation issued (15 Working days)
26th January 2016	Deadline for responses
2nd February 2016	Draft CUSC Modification Report issued for Industry comment
9th February 2016	Deadline for comment
18th February 2016	Draft CUSC Modification Report issued to CUSC Panel
26th February 2016	CUSC Panel determination vote
10th March 2016	Final Modification Report submitted to Authority
14th April 2016	Authority Decision due
28th April 2016	Implementation date (if approved)

CMP258 Indicative timetable 4 (not Self Governance - WG)

W/C 11th January 2016	Workgroup meeting 1
25th January 2016	Workgroup Consultation issued
15th February 2016	Deadline for responses
18th February 2016	Workgroup meeting 2
10th March 2016	Workgroup Report submitted to CUSC Panel
18th March 2016	CUSC Panel determination vote
21st March 2016	Code Administrator Consultation issued
11th April 2016	Deadline for responses
12th April 2016	Draft FMR issued to Industry
19th April 2016	Deadline for comment
29th April 2016	CUSC Panel determination vote
12th May 2016	Final Modification submitted to Authority
17th June 2016	Decision due
1st July 2016	Implementation date (if approved)