

# Agenda

1	Introduction, meeting objectives and review of previous actions Jenny Doherty - NGESO	10:30 - 10:35
2	Code administrator update Paul Mullen - Code Administrator NGESO	10:35 - 10:45
3	Gender Neutral Modification Paul Mullen - Code Administrator NGESO	10:45 - 10:50
4	Market-wide Half Hourly Settlement Update Keren Kelly - NGESO	10:50 - 11:05
5	TNUoS demand zones for transmission - connected demand at sites with multiple DNOs – Guidance for 2022/23 James Stone - NGESO	11:05 - 11:15
6	BSUoS Operational Update Nick Everitt - NGESO	11:15 - 11:30
7	User Commitment Neil Bennett - SSEN	11:30 - 12:00
8	AOB and Meeting Close Jenny Doherty - NGESO	12:00 - 12:15



# Review of previous actions

ID	Month	Agenda Item	Description	Owner	Notes	Target Date	Status
21-6	Sept 21	TNUoS gen cap error margin calculation - 2021 result	Confirm whether station demand is included as eligible revenue	JZ	It has been confirmed that eligible revenue (for the purpose of gen cap) does not include power station demand charges.	Nov 21	Open
21-7	Sept 21	Early Competition Plan update	Share an estimate of the length of time between tender and delivery	KM	We expect these to depend on the complexity of the need but estimate around 18 months to 24 months for the E2E tender process.	Nov 21	Open
21-8	Oct 21	ESO Bad Debt Recovery	To provide timeline and forecast dates	JM		Nov 21	Open



# Code Administrator Update

Paul Mullen, Code Administrator





Authority dec	Authority decisions since last TCMF							
Modification	What this does?	Decision Date						
CMP378		Decision received 12 October 2021 approving the CMP378 Original – implemented 15 October 2021.						



Modification	What this seeks to achieve?	Decision Date / Anticipated Decision Date
CMP335/336 and CMP343/340	Proposes the methodology for Transmission Demand Residual charges to be applied only to 'Final Demand' on a 'Site' basis, as well as how to treat negative locational charges and the application of any charging bands.; CMP335/336 looks at the Transmission Demand Residual billing and consequential changes	Expected final decision date for CMP343, CMP340, CMP335 and CMP336 Modifications was 27 August 2021; however Ofgem confirmed at CUSC Panel on 27 August 2021 that this date would not be met. At CUSC Panel on 29 October 2021, Ofgem confirmed they have no firm date for a decision.
CMP292	Introduces a cut-off date for changes to the Charging Methodologies	TBC in 2021 (previously 30 June 2021 and latterly 30 September 2021) as Ofgem consider this to be low priority
CMP371	Seeks to update CUSC Section 8 such that it is possible, under one CUSC Modification Proposal, to change CUSC provisions relating to Connection Charges, and Use of System Charging Methodologies alongside non-charging provision	19 November 2021

On 4 May 2021 (last updated 16 September 2021), Ofgem published a table that provides the expected decision date, or date they intend to publish an impact assessment or consultation, for code modifications/proposals that are with them for decision here

Modification	What this seeks to achieve?	Decision Date / Anticipated Decision Date
CMP308	Seeks to modify the CUSC to better align GB market arrangements with those prevalent within other EU member states by removing BSUoS charges from Generation.	· ·
CMP368/369	CMP368 seeks to give effect to the Authority determination within the CMP317/327 decision published on the 17 December 2020 to amend the definition of Assets Required for Connection, create new definitions of 'GB Generation Output' and define Generator charges for use in the Limiting Regulation range calculation. To facilitate the change, CMP369 proposes to update the legal text relating to 'Generation Output' detailed in the tariff setting methodology within Section 14.14.5 and the Ex-Post Reconciliation within Section 14.17.37 of the CUSC to align with the updated definitions introduced by CMP368.	Ofgem 23 September 2021 seeking decision on or before 28 October 2021. At CUSC Panel on 29 October 2021, Ofgem noted that their decision will follow the outcome of the current judicial review re: the CMA's decision of 30 March 2021 to dismiss the appeal against decisions by

On 4 May 2021 (last updated 15 October 2021), Ofgem published a table that provides the expected decision date, or date they intend to publish an impact assessment or consultation, for code modifications/proposals that are with them for decision here

Modification	What this seeks to achieve?	Decision Date / Anticipated Decision Date
CMP377	Seeks to provide clarity on how the BSUoS charging methodology is described in Section 14 of the CUSC. The four areas being addressed are: Covid-19 cost recovery calculations, capitalisation of defined terms in CMP373 legal text, clarifying storage import terminology and general housekeeping	



## Implementations Summary (as at 2 November 2021)

#### **Implementations**

Modification	What this does?	Implementation Date
CMP378	Places an obligation on The Company (defined in the CUSC as National Grid Electricity System Operator (NGESO) Limited) to comply with the obligations insofar as these apply to it under Section C12 (Market-wide Half-Hourly Settlement Implementation) of the Balancing and Settlement Code (BSC).	15 October 2021



### Withdrawals Summary (as at 2 November 2021)

#### Withdrawals (in progress)

Modification	What this does?	Latest
CMP358/ CMP359	The Small Generator Discount (SGD) is currently contained in the ESO's licence. The SGD expired on 1 April 2021. Given the ongoing uncertainty over the Forward Looking and Access SCR, CMP358 proposes that the SGD is put into the CUSC and CMP359 will seek to define SGD and CPI/CPIH.	The Proposer of CMP358 & CMP359 notified Code Admin on 2 November 2021 that they no longer wish to be Proposer of these modifications. Industry were notified on 2 November 2021 and have until 5pm on 10 November 2021 to express their wish to become the new Proposer. If no-one jhas expressed a wish to become the new Proposer by 5pm on 10 November 2021, Panel, on 26 November 2021, will be asked under 8.16.10(b) to agree to the withdrawal of CMP358 and CMP359.



#### **Last Panel**

#### 29 October 2021

- No New Modifications or Workgroup Reports
- By majority recommended implementation of all proposed options for CMP328 (which seeks to put in place an appropriate process to be utilised when any connection triggers a Distribution impact assessment)
- CMP286/287 (Improving TNUoS Predictability Through Increased Notice of the Target Revenue/Inputs used in the TNUoS Tariff Setting Process) re-prioritised by Panel from Low to Medium. Therefore Workgroups will re-commence from 7 December 2021.
- Presented forward look out on CUSC, Grid Code and STC Modifications for next 12 months – really helps see where the gaps and constraints are and enables the right conversations about prioritisation.
  - Only 4 Modifications are not being currently progressed.



#### **Next Panel**

#### **26 November 2021**

- One new Modification "Gender Neutral Modification" to be raised by Code Admin
- Panel to agree whether or not the CMP361/362 (Introduction of an ex ante fixed BSUoS tariff and consequential changes) Workgroup has met its Terms of Reference
- Update on our Code Administrator 2021/2022 Deliverables and ESO Customer Satisfaction Survey results
- 2022 Panel Dates
- Forward look out on Modifications for next 12 months



#### **Gender Neutral Modifications**

- The Code Admin team are looking to remove all gender specific references and terminology within our Codes and make them gender neutral. As part of this journey we will be raising two new modifications in November for the CUSC and Grid Code and requesting that these go down the self-governance route. Further modifications to make changes to the STC and SQSS will also be raised in January 2022.
- The CUSC changes that we will be proposing are:

<b>Current Term</b>	Future Term	Parts of the code impacted
Chairman	Chair	Sections 8 and 11
Dear Sir/Madam	Dear XXXXXX	Schedule 2 Exhibit 3, Exhibits C, E, G, H, J, N, R and V
		Sections 7, 8 and 11, Schedule 2 Exhibit 3 and 3a,
He/She	They	Exhibits B, F, U, V, O (Part I B, Part I C, Part II B and Part II C)
	-	Sections 6, 7, 8 and 11, Schedule 2 Exhibit 3 and 3a,
Him/Himself	Them/Themself	Exhibits O (Part I B, Part I C, Part II B and Part II C)
		Sections 1, 5, 6, 7, 8, 11, Schedule 2 Exhibit 3 and 3a, Exhibits
His	Their	G, H, O (Part I B, Part I C, Part II B and Part II C)

In Flight Modification Updates



#### In flight Modifications (as at 2 November 2021)



For updates on all "live" Modifications please visit "Modification Tracker" at:

https://www.nationalgrideso.com/industry-information/codes



2021 and 2022 **Dates** national**gridESO** 

#### **CUSC 2021 - Panel dates**

CUSC	(TCMF) CUSC Development Forum	Modification Submission Date	Papers Day	Panel Dates
January	7	14	21	29
February	4	11	18	26
March	4	11	18	26
April	8	15	22	30
May	6	13	20	28
June	3	10	17	25
July	8	15	22	30
August	5	12	19	27
September	2	9	16	24
October	7	14	21	29
November	4	11	18	26
December	25/11	2	9	17

2022 Dates to be communicated after Panel on 26 November 2021



# Market-wide Half Hourly Settlement (MHHS) Update

Keren Kelly, National Grid ESO



#### Market-wide Half Hourly Settlement (MHHS) Update

The Code Change and Development Group (CCDG) has published <u>'Recommendations on the Transition to Market-wide Half-Hourly Settlement'</u>

The aim of the recommendations is to facilitate an efficient transition to MHHS, in line with the timeline set out in the MHHS Decision Document

Raising at TCMF due to potential impacts to TNUoS charging

As a result of the recommendations, there are some metering types that will migrate to HH settlement earlier than the bulk HH migration (October 2024 to October 2025). These are:

- CT Advanced Meters (approx. 50,000 CT Metered sites) Oct-22 to Oct-23
- NHH Unmetered sites (approx. 32,000 UMS sites) Oct-23 to Oct-24

Some recommendations are being enacted through industry code modifications. Following consideration of CCDG consultation responses, it has been determined that no CUSC modifications will be raised as a result of the above recommendations.

The potential impacts to TNUoS charging are from Change of Measurement Class (CoMC) activity, and these impacts vary depending upon the Measurement Class (current and future) and when the CoMC takes place in the charging year.



#### Market-wide Half Hourly Settlement (MHHS) Update

#### Key to note:

- The decision uses assumptions on what TNUoS methodologies and charging structures will look like across the MHHS transition period, including that proposed TNUoS changes under the TCR are implemented from April 2023.
   The locational element of TNUoS, which distinguishes between NHH and HH settlement, will make up a much smaller proportion of the TNUoS charge from this point onwards (5%).
- The time period for the CT Meter recommendation is listed as October 2022 to October 2023. This recognises an
  element of preparatory work that may need to be undertaken. In order to minimise any impacts relating to TNUoS
  charging, it will be recommended that the actual CoMC activity takes place from March 2023.

NGESO is actively involved with the MHHS Programme and recognises that there will be future CUSC modifications as a result of MHHS transition and implementation. We note that there will be a lot of TCMF attendees that are part of the MHHS Programme, but we will continue to share relevant information through TCMF.



# TNUoS demand zones for transmission - connected demand at sites with multiple DNOs – Guidance for 2022/23

James Stone, National Grid ESO



# **BSUoS** Operational Update

Nick Everitt, National Grid ESO





#### **BSUoS Operational Update**

#### **ESO Incentive Recovery**

- For the 2020/21 charging year NG ESO was awarded an incentive of £5m (link to Ofgem comms)
- We previously communicated that we intended to recover the incentive via the SF run of the 2021/22 charging year (link to our comms)
- Ofgem yesterday gave approval of the above approach.
- The ESO incentive will be recovered over settlement days from 1<sup>st</sup> November 2021 to the 31<sup>st</sup> March 2022.
- This will mean a daily recovery value of £33,112.58 per day over 151 days.

#### October 20th Invoices Correction

- There was an issue with the SF run we billed for the 26/09/2021 settlement day, we invoiced this on the 20<sup>th</sup> October. (link to our comms)
- Supplier Volumes were not included in the calculations made for this single run.
- This error will be corrected via ad-hoc invoices/credits to be issued next Tuesday, 9<sup>th</sup> November.
- BPA, BCR reports and BSUoS web prices will be regenerated and sent out via the normal channels after the recalculations have taken place.
- Sincere apologies for this issue, corrective actions are already in place to prevent a further reoccurrence of this.

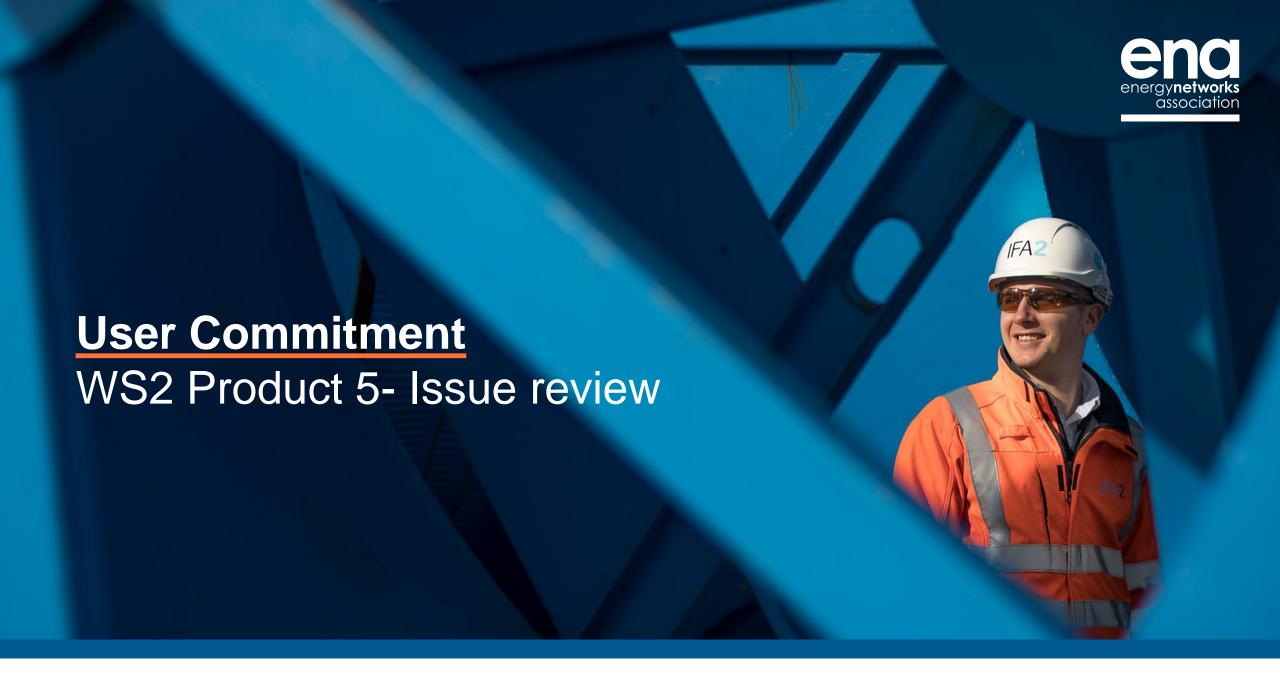
For further information on the above or anything else BSUoS billing related, please contact me directly at <a href="mailto:nick.everitt@nationalgrideso.com">nick.everitt@nationalgrideso.com</a> or my team at <a href="mailto:bsuos.queries@nationalgrideso.com">bsuos.queries@nationalgrideso.com</a>



# **User Commitment**

Neil Bennett, SSEN









The below table highlights the issues/concerns that have been formulated through the ENA Workstream 2 working group with input from some early stakeholder engagement. They represent what we believe is the definitive list of issues, however, if there are any further issues you feel should be added to the list, please contact me at neil.bennett@sse.com.

Affected area	<u>No.</u>	Detail of Issue	What needs revising?	Summary of issue	Summary of potential action
Trigger Date- The date when security percentages reduce from 100% and when wider works liability is applicable	1	Currently, the trigger date is the 1st April, 3 financial years prior to the financial year of the connection date. Where Transmission Owners incur significant expenditure prior to the trigger date, Developers would incur a higher security percentage.	CUSC 15	Having a higher percentage of securities prior to the trigger date for some long lead reinforcements increases securities	Review trigger period
	2	The trigger date can be delayed where a scheme delays their connection date. If the TO proceeds with the construction, however, expenditure would continue to increase but as the customer has not breached the trigger date, this means security would be 100% of the expenditure. Should this still be 100%?	CUSC 15	Delays by the User, who is still in pre- trigger, where TO continues expenditure increases incurs higher securities where still 100% security percentage	Review pre-trigger date percentage
	3	The April 1st trigger date, doesn't reflect the timing of most connection schemes which occur around Oct-Dec following summer outage periods.	CUSC 15	Trigger date of April 1st is not reflective of connection dates	Review of when pre trigger commences



Affected area	<u>No.</u>	Detail of Issue	What needs revising?	Summary of issue	Summary of potential action
Security Percentage	4	Consented schemes reduce percentage of security only when they have breached the trigger date. Consented schemes reduce the risk of termination irrespective of when consenting has been achieved.	CUSC 15	When a scheme consents this doesn't reduce securities unless in trigger period	Review security percentage reduction for consented scheme
	5	The reduction of security percentage once trigger has been achieved is 45%(non consented) and 26% (consented) for Distribution and 42%(non consented) and 10%(consented) for Transmission. Firstly, the disparity between Distribution and Transmission should be reviewed but also whether these percentages overall reflect a reasonable reduction.	CUSC 15	Differential of security percentages depending on whether the scheme is Transmission or Distribution connected.	Review percentage disparity between Distribution and Transmission as well as overall percentages
Wider Cancellation Charge	6	Wider works cancellation charge commences when a scheme reaches the trigger date. Generally, schemes which aren't ready to connect, delay their connection date just prior to this commencing due to the fact that wider works cancellation is a mandatory termination charge. Delaying the commencement of the wider works cancellation charge may have a positive effect of reduced modification applications.	CUSC 15	Wider works cancellation charge trigger date is set prior to likelihood of scheme being ready to connect and causes multiple mod apps.	Review commencement of wider cancellation charge



Affected area	No.	Detail of Issue	What needs revising?	Summary of issue	Summary of potential action
	7	The wider cancellation charge increases in 25% increments once trigger date has been reached but a review of these should be undertaken to ensure these percentages are relevant. Eg a customer is more likely to proceed to connection within 2 years of connection so perhaps high level of percentage closer to the connection (eg 90% and 100%) but further out from the connection date, lower the percentage (eg 10% and 30%).	CUSC 15	Wider cancellation charge percentages do not reflect Developer scheme readiness to connect	Review wider cancellation charge percentages
	8	A wider cancellation charge is applicable irrespective of its commencement and so a wider fee does not always seem reflective of existing works and therefore is the £/MW level reasonable.	CUSC 15	Wider cancellation £/MW level is based on historical as well as new wider works.	Review £/Mw level
	9	There is a wider works cancellation charge post connection but clarity is required on whether this is applicable to DNOs as well as Transmission connected schemes. If it isn't applicable to DNOs, what is the cause of this and is this potentially discriminatory?	Guidance note	Should wider cancellation charge post-connection only be applicable to Transmission schemes?	Clarify requirement for post connection wider cancellation charge



Affected area	<u>No.</u>	Detail of Issue	What needs revising?	Summary of issue	Summary of potential action
	10	More transparency is required on the calculation of wider works. There has been extreme variations in forecast accuracy in recent years and a review should be held to improve accuracy or improve communication in how its calculated.	NGESO processes and communicatio n	Wider works calculations need more transparency.	Clarify wider works calculation process
Fixed Liability	11	Once a scheme has chosen a fixed liability, there is no option to become variable again but there are circumstances where the TO drastically change the scope of works.	CUSC 15	No options to change from fixed liability once chosen	Review when a scheme can change from fixed to variable
	12	The £/KW rates when a scheme is on a fixed liability prior to the trigger date- Does the evidence show these are reasonable amounts?	CUSC 15	Fixed liability pre trigger amounts may not be reflective	Review £/kw rates
Transmission Impact Assessment/APP G	13	Considerations required on how to implement securities into TIA for example will there be a cooling off period where, after a customer is allocated onto appendix G, they can terminate without incurring termination fees?	CUSC 15	There is no securities consideration in the TIA CUSC mod	Assess potential for cooling off period for securities/liabilities in Appendix G



Affected area	<u>No.</u>	Detail of Issue	What needs revising?	Summary of issue	Summary of potential action
	14	Where there are multiple schemes allocated to Appendix G which has a single reinforcement required for a GSP, how are termination fees determined where schemes have terminated? Should it be a last man standing principle? Affected area for revision.	CUSC 15	How should termination fees be apportioned where there are multiple schemes terminating at different stages?	Assess termination principles on Appendix G
	15	Forecasts for liabilities for Attributable Works for App G GSPs where there is known works required- Affected area for revision- NGESO process and communication.	NGESO process and communicatio n	Currently no forecasts for attributable works where known	Assess viability for attributable works forecasting for Appendix G
Embedded/DNO concerns	16	Explicit clarification that DNOs are not liable for the balance of cancellation (ie total liabilities less any recovered from security) if they have followed appropriate recovery steps with the developer. – Affected area for revision- NGESO process and communication.	NGESO process and communicatio n.	Clarification of liabilities on DNOs where appropriate recovery procedures are taken	Investigate DNO recovery rights where liabilities are not fully acquired post-termination



Affected area	No.	Detail of Issue	What needs revising?	Summary of issue	Summary of potential action
	17	Feedback from Solar Energy UK is that there is a general lack of transparency from the network companies with regards to what the securities/liabilities are made up of. Solar Energy UK Members have suggested that the preferred approach would be based on UKPN's provision of information with the added inclusion of National Grid's 4-year prediction of charges, and for all DNOs to adopt a similar approach and provide the same information.	New guidance note/fact sheet	Transparency required on security/liability breakdowns when issued from DNOs	Review the potential for a new guidance note or fact sheet.
Security provision	18	Security provisions occur bi-annually. Could this be moved to annual to provide more stability for the customer? STC(BI annual estimate)/CUSC 15/TO process improvement Affected area for revision- NGESO and TO process. Also CUSC and STC amendments.	NGESO and TO process. Also various CUSC and STC amendments	Security provisions are biannual but may be more appropriate for fewer provisions within the year	Investigate whether amending security provisions to annual would be appropriate
	19	Are there any alternatives for security provision (ie the ways of providing security eg letter of credit) and can the current Triple A rating option be lowered in order to allow more companies to be able to use credit rating as an option.	Guidance note and CUSC 15	Triple A credit rating is too high for majority of companies and alternatives should be considered.	Assess whether there are any alternative ways to provide security



Affected area	<u>No.</u>	Detail of Issue	What needs revising?	Summary of issue	Summary of potential action
	20	At present, securities that are not provided in cash form must be in place 45 days or more in advance but could this be reviewed to see if non cash security provision can be aligned with cash?	CUSC 15	Security provision timeframes are potentially too onerous.	Assess period for security provision
Security calculation	21	Is there a consistent treatment of component capability by the Transmission Owners (TO's) eg where a component does not have an MVA value, are these allocated a value consistently as it will affect the SIF value of the liability. Affected area for revision.	STC and TO processes	Component capability where no MVA value should be reviewed.	Assess component capability treatment by the TO's
	22	MITS node/Attributable- Securities for attributable works are only for works up to and including the MITS node. Where there are GSPs that are only single circuit and Transformer, these will not be classed as MITS nodes and the MITS nodes can be far beyond the GSPs for Developers to securitise.	CUSC 11	GSP MITS nodes are not consistent across all GSPs.	Assess definition of MITS node and attributable



Affected area	<u>No.</u>	Detail of Issue	What needs revising?	Summary of issue	Summary of potential action
Accessibility/Clarifications	23	Is the NGESO guidance note up to date and still relevant?	Guidance note	Guidance note potentially out of date.	Assess relevance of NGESO's guidance note
	24	Can the current MM (security/liability) statement layout be improved for increased User-friendliness?	MM statements	Security statement layout is not user friendly.	Assess relevance of NGESO's guidance note
	25	Where the TO delays reinforcement of the network is it fair to enforce cancellation charges to the developers if that delay makes their project unviable?	CUSC 15 and guidance note	Cancellation charges where TO delays reinforcements-Are they fair?	Assess cancellation charge requirements following TO initiated delays
Miscellaneous	26	There are occasions where wider transmission enabling works have completed prior to the connection of the scheme but as they works are attributable the scheme would still incur a liability due to the potential of stranded assets. Many wider assets have multiple customers connecting to them and would therefore not cause stranded assets so can there be a way of reducing/removing liability for these customers?	CUSC 15	Where there are customers connecting to assets that have been constructed, is it right to keep the existing liability levels the same?	Assess liability of schemes that connect after infrastructure is constructed



Affected area	No.	Detail of Issue	What needs	Summary of issue	Summary of potential action
			revising?		
	27	Demand Users are still not subject to CUSC 15 and are still on the old securities system.	CUSC 15	Demand Users should be subject to CUSC 15	Assess incorporating Demand Users into CUSC 15

The remaining issues are DNO specific and are not related to CUSC 15 issues



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# **AOB & Close**



#### **AOB – 3 quick reminders**

- 1) Ofgem have a TNUoS call for evidence open until **12 November 2021**. You can find the link here: <a href="https://www.ofgem.gov.uk/publications/tnuos-reform-call-evidence">https://www.ofgem.gov.uk/publications/tnuos-reform-call-evidence</a>
- 2) Ofgem have a minded to decision and consultation on an Electricity Transmission Licence for a Pathfinder project, open until **22 November 2021**. You can find the link here: Consultation on minded-to decision for an application for an Electricity Transmission Licence for Mersey Reactive Power Limited for the operation of a shunt reactor | Ofgem
- 3) In order to implement the new Electricity System Restoration Standard (ESRS), the ESO has identified seven areas that need development and we are seeking views from industry on those areas. To join one of these groups, or for more information, please contact Sade Adenola, sade.adenola@nationalgrideso.com