











CUSC Modification Proposal Form		At what stage is this document in the process?												
<h1 style="color: #00a651;">CMP335</h1> <p>Mod Title: Transmission Demand Residual, billing and consequential changes to CUSC Section 3 and 11 (TCR)</p>	<table border="1" style="width: 100%; text-align: center;"> <tr> <td style="background-color: #00a651; color: white;">01</td> <td style="background-color: #00a651; color: white;">Proposal Form</td> </tr> <tr> <td>02</td> <td>Workgroup Consultation</td> </tr> <tr> <td>03</td> <td>Workgroup Report</td> </tr> <tr> <td>04</td> <td>Code Administrator Consultation</td> </tr> <tr> <td>05</td> <td>Draft CUSC Modification Report</td> </tr> <tr> <td>06</td> <td>Final CUSC Modification Report</td> </tr> </table>		01	Proposal Form	02	Workgroup Consultation	03	Workgroup Report	04	Code Administrator Consultation	05	Draft CUSC Modification Report	06	Final CUSC Modification Report
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<p>Purpose of Modification: The Authority published on 21 November 2019 a Direction to NGENSO to raise such modifications as are necessary to give effect to their Decision(s) under the Targeted Charging Review (TCR) SCR. CMP332 is developing a methodology for the Residual to be applied only to 'Final Demand' on a 'Site' basis (as per the Direction); however it does not cover how/when the Residual is recovered from parties once the Residual charges are determined. Broadly, this modification therefore looks to revise existing processes to account for the CMP332 methodology post tariff creation and create new processes to ensure 'Sites' are allocated to the correct charging band (as created by CMP332).</p>														
	<p>The Proposer recommends that this modification should be:</p> <ul style="list-style-type: none"> assessed by a Workgroup be treated as urgent and should proceed as such under a timetable agreed with the Authority <p>This modification was raised 16 January 2020 and will be presented by the Proposer to the Panel on 31 January 2020. The Panel will consider the Proposer's recommendation and determine the appropriate route.</p>													
	<p>High Impact: NGENSO, Distribution Network Operators, Suppliers and Demand Users connected to the Transmission Network.</p>													
	<p>Medium Impact N/A</p>													
	<p>Low Impact N/A</p>													

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Timetable																				
<p>The Code Administrator recommends the following timetable: to be agreed at 1st Workgroup</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tbody> <tr> <td style="width: 60%;">Initial consideration by Workgroup</td> <td style="width: 40%;">dd month year</td> </tr> <tr> <td>Workgroup Consultation issued to the Industry</td> <td>dd month year</td> </tr> <tr> <td>Modification concluded by Workgroup</td> <td>dd month year</td> </tr> <tr> <td>Workgroup Report presented to Panel</td> <td>dd month year</td> </tr> <tr> <td>Code Administration Consultation Report issued to the Industry</td> <td>dd month year</td> </tr> <tr> <td>Draft Final Modification Report presented to Panel</td> <td>dd month year</td> </tr> <tr> <td>Modification Panel decision</td> <td>dd month year</td> </tr> <tr> <td>Final Modification Report issued the Authority</td> <td>dd month year</td> </tr> <tr> <td>Decision implemented in CUSC</td> <td>dd month year</td> </tr> </tbody> </table>		Initial consideration by Workgroup	dd month year	Workgroup Consultation issued to the Industry	dd month year	Modification concluded by Workgroup	dd month year	Workgroup Report presented to Panel	dd month year	Code Administration Consultation Report issued to the Industry	dd month year	Draft Final Modification Report presented to Panel	dd month year	Modification Panel decision	dd month year	Final Modification Report issued the Authority	dd month year	Decision implemented in CUSC	dd month year	
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Proposer Details

Details of Proposer: (Organisation Name)	National Grid ESO
Capacity in which the CUSC Modification Proposal is being proposed: (i.e. CUSC Party, BSC Party or "National Consumer Council")	CUSC Party
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	Grahame Neale National Grid ESO 07787 261242 Grahame.Neale@nationalgrideso.com
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	Eleanor Horn National Grid ESO 07966 186088 Eleanor.Horn@nationalgrideso.com
Attachments (No): If Yes, Title and No. of pages of each Attachment:	

Impact on Core Industry Documentation.

Please mark the relevant boxes with an "x" and provide any supporting information

BSC	<input type="checkbox"/>
Grid Code	<input type="checkbox"/>
STC	<input type="checkbox"/>
Other	<input type="checkbox"/>

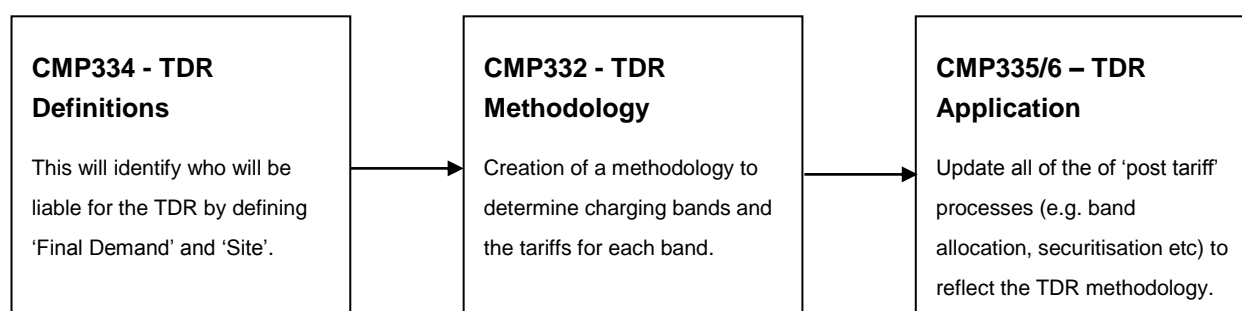
No other codes expected to be impacted by the Proposal

1 Summary

Defect

On 21 November 2019, The Authority published a Direction¹ henceforward referred to as “the Direction” requiring NGESO to raise code modifications giving effect to their Decision² under the Targeted Charging Review (TCR) Significant Code Review (SCR). All references herein to ‘Residual’ mean the residual element of Demand TNUoS unless otherwise specified.

On 20 December 2019, DNOs and NGESO published a joint plan³ (the ‘detailed plan’) to deliver the requirements of the Direction. The detailed plan sets out the proposed delivery approach (section 4.5) which includes three CUSC modifications (including CMP332 and this proposal) and four DCUSA modifications. The CUSC modifications will be broadly structured as follows;



NGESO have raised CUSC Modification Proposal CMP332 which is concerned with determining a methodology of calculating the residual element of Demand TNUoS – it does not cover how/when the Residual is recovered from parties once the Residual charges are determined.

Therefore this modification aims to revise Section 3 and 11 of the CUSC so that the following is compatible with the solution developed under CMP332 and CMP334;

- Create a process for allocating Sites (as defined under CMP334) to the bands (determined under CMP332) as per paragraphs 24 and 25 of the Direction;
- Determine if existing processes for dispute resolution remain effective as per paragraphs 32 and 36 of the Direction;
- Update the Reconciliation Statements section of CUSC (Section 3.13) insofar as it relates to the Residual;
- Update the Credit Monitoring section of CUSC (Section 3.23) and Appendix 2 of Section 3 as a consequence of CMP332 and CMP334;
- Add, Remove or update any definitions in Section 11 as required, excluding any changes developed under CMP334; and
- Update CUSC Section 14.17.18 through to 14.17.37.

¹ https://www.ofgem.gov.uk/system/files/docs/2019/11/cusc_direction_1.pdf

² https://www.ofgem.gov.uk/system/files/docs/2019/12/full_decision_doc_formatted_updated9.pdf

³ <http://www.chargingfutures.com/media/1390/tcr-joint-eso-dno-pid-v10.pdf>

A consequential modification will also be raised to enact changes within Section 14.

What

Broadly, the current process for billing and securitisation of Demand TNUoS will need to be updated to account for the solution progressed under CMP332 and the need for Suppliers to provide forecasts of expected 'Final Demand Site' volumes. 'Final Demand' and 'Site' definitions will be developed via a separate CUSC modification (CMP334) and added to Section 11.

New processes and data flows will need to be created to;

1. Allow Suppliers and Transmission Connected Demand Users to forecast the number of 'Final Demand Sites' and place appropriate security in place based on these forecasts;
2. NGENSO to bill the above parties based upon their forecast; and
3. A reconciliation to take place between actual values and User provided forecast values with invoices/credits to be issued accordingly.

The current invoicing process, timescales, credit requirements, payment terms and User Allowed Credit arrangements are deemed to be out of scope as they will be discussed under CMP311.

In addition, new processes will need to be designed to allocate Sites to bands (under the methodology of CMP332) and existing processes reviewed to ensure disputes are adequately managed (as per paragraphs 24, 25, 32 and 36 of the Direction).

Why

Whilst CMP332 will develop the TNUoS Demand Residual methodology in line with the Authority's Decision, CMP332 will not cover the detail of how the methodology will be implemented. Therefore, this modification is required to fully implement the Authority's decision as the current approach to TNUoS liability forecasting, securitisation and billing will not be suitable once CMP332 is implemented.

How

Broad revisions to Section 3 and 11 as highlighted in the Defect are required to give effect to the solution.

2 Governance

Justification for Normal, Urgent Procedures

This Proposal should follow normal governance channels and be treated as urgent. The Company has been directed to raise this modification proposal and implement The Authority's decision by April 2021. To allow the necessary system and process changes to take place (e.g. data exchanges), in order to prevent NGENSO from breaching the terms of the Direction and therefore the provisions of its Licence and the CUSC, this modification will need to follow an Urgent timetable.

Requested Next Steps

This modification should be treated as urgent and should proceed as such under a timetable agreed with the Authority and be sent to Workgroup for assessment.

3 Why Change?

Whilst CMP332 will develop the TNUoS Demand Residual methodology in line with the Authority's Decision, CMP332 will not cover the detail of how the methodology will be implemented. Therefore, this modification is required to fully implement the Authority's decision as the current approach to Demand TNUoS will not be suitable once CMP332 is implemented.

4 Code Specific Matters

Technical Skillsets

Understanding of the Authority's Direction

TNUoS billing, securitisation and liability forecasting requirements

Reference Documents

See footnotes in the Summary section

5 Solution

The solution to this Proposal shall consist of;

- Revising the current CUSC responsibilities and data requirements so that Suppliers and Transmission Connected Demand Users provide accurate forecasts of 'Final Demand Sites';
- Updating security requirements so that the 'Final Demand Sites' are included in the determination of the required security cover;
- Reconciliation processes include 'Final Demand Site' forecasts in their calculations;

- Confirming the NGESO shall be responsible for allocating Transmission connected Sites to the appropriate TDR bands and managing any associated disputes with these Transmission Connected Sites; and
- Confirming the respective DNO shall be responsible for allocating Distribution connected Sites to the appropriate TDR bands, managing any associated disputes with these Distribution connected Sites and the associated data processes to manage these responsibilities.

6 Impacts & Other Considerations

The Main impacts will be upon NGESO, DNOs and those liable for Demand TNUoS as new processes and requirements will be associated with Demand TNUoS which therefore will have system implications.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

This modification is supporting the implementation of the Authority’s Targeted Charging Review SCR.

Consumer Impacts

Whilst this modification by itself does not provide any consumer impacts, it is supporting the implementation of the Authority’s Targeted Charging Review SCR, the consumer impacts of which are documented in the Decision.

7 Relevant Objectives

Impact of the modification on the Applicable CUSC Objectives (Standard):	
Relevant Objective	Identified impact
(a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;	Positive
(b) Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;	None
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and	None
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	Positive
*Objective (c) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).	

This modification is expected to have a positive impact against CUSC applicable objectives A and D as this proposal will ensure that the CUSC remains fit for purpose with the implementation of the Authority's TCR decision. The rationale for the Decision(s) made by the Authority in respect of the Targeted Charging Review SCR can be found in the Authority/GEMA publications relating to that SCR

There is no expected impact upon CUSC applicable objective B and C.

8 Implementation

This modification needs to be approved with sufficient time to be effective from April 2021 to align with CMP332 but can be progressed via Workgroup on separate timescales.

9 Legal Text

To be developed by the Workgroup.

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Normal, urgent governance procedures should apply
- Refer this proposal to a Workgroup for assessment.