

CUSC Workgroup Consultation

CMP334: Transmission Demand Residual - consequential definition changes (TCR)

Overview: As per the Authority's Targeted Charging Review (TCR) SCR direction the Demand Residual is to be applied only to 'Final Demand' on a 'Site' basis. CMP334 seeks to define these terms in a manner which is consistent with DCUSA Change Proposal 359

Modification process & timetable

1	• Proposal form • 16 January 2020
2	• Workgroup Consultation • 23 March 2020 to 15 April 2020
3	• Workgroup Report • 1 May 2020
4	• Code Administrator Consultation • 12 May 2020 to 22 May 2020
5	• Draft Code Modification Report • 26 May 2020
6	• Final Code Modification Report • 9 June 2020
7	• Implementation • 01 April 2021

Have 5 minutes? Read our Executive summary

Have 20 minutes? Read the full Workgroup Consultation document

Have 30 minutes? Read the full Workgroup Consultation document and annexes

Status summary: Workgroup Consultation. The Workgroup are seeking your views on the work completed to date to form the final solution(s) to the issue raised.

This modification is expected to have a:
high impact

NGESO, Suppliers, Demand Users (connected to the Transmission Network or Distribution network) and Distribution Network Operators

Governance route

This modification will be assessed by a joint CUSC/DCUSA Workgroup and Ofgem will make the decision on whether it should be implemented

Who can I talk to about the change?

Proposer: Grahame Neale, National Grid ESO

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07787 261 242



**Code Administrator
Chair:** Paul Mullen

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How do I respond?

Send your response proforma to cusc.team@nationalgrideso.com by **5pm on 15 April 2020**

Executive Summary

CMP332 is developing a methodology for the Residual to be applied only to 'Final Demand' on a 'Site' basis (as per Ofgem's TCR Direction¹); however, CMP332 is not defining these terms. CMP334 seeks to define these terms in a manner which is consistent with the Distribution Connection and Use of System Agreement (DCUSA) and in line with paragraphs 14-17 of Ofgem's TCR Direction to NGENSO².

What is the issue?

Currently, the CUSC has no concept of 'Final Demand' and 'Single Site' and these terms need to be added to allow the methodology that is being developed under CMP332 to function.

What is the solution and when will it come into effect?

Proposers solution: The Proposer seeks to add definitions of "Single Site", "Final Demand" and "Final Demand Site" into the CUSC so it is clear which parties will pay the Transmission Demand Residual charge.

Implementation date: As directed by the Authority this change needs to be implemented at the earliest opportunity once approved by the Authority, for use of system charging effective from 1 April 2021 Charging Year.

What is the impact if this change is made?

Who will it impact?

Whilst this proposal will not directly affect any party, it will have large impacts on some users when combined with other modifications resulting from the TCR (for example, CMP332). This is a large-scale change that will require amendments and consequential changes to all Supplier and DNO processes whilst also affecting all demand users.

What are the positive impacts?

The Authority has established that there are consumer benefits to this change due to flexible customers no longer being able to avoid the costs of residual transmission charges.

The DCUSA is impacted by the Proposal – hence why we are jointly running this Workgroup with DCP359, being the equivalent DCUSA modification.

Interactions

CMP334 is one of four CUSC modifications which will change the way the Transmission Demand Residual (TDR) is calculated and charged as per Ofgem's TCR SCR Direction.

¹ <https://www.ofgem.gov.uk/publications-and-updates/targeted-charging-review-decision-and-impact-assessment>

² Note a similar, but separate, Direction was issued by the Authority at the same time to the DNOs.

Note there is an equivalent DCUSA Workgroup Consultation (DCP359) being run in parallel with the CMP334 Workgroup Consultation. This is available at <https://www.dcusa.co.uk/event/dcp-359-consultation/>

Introduction

This document is the CMP334 **Workgroup's Consultation**. This document outlines:

- **What is the issue?**
- **What is the solution?**
 - Proposer's solution
 - Workgroup considerations
 - Other potential solutions
 - Legal text
- **What is the impact of this change?**
- **When will the change taken place?**
- **How to respond**
- **Acronym table and reference material**

What is the issue?

Defect

The Authority published on 21 November 2019 a Direction to NGENSO to raise such modifications as are necessary to give effect to its Decision(s) under the Targeted Charging Review (TCR) Significant Code Review (SCR).

On 20 December 2019, DNOs and NGENSO published a joint plan (the 'detailed plan'³) 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.

CMP332 is developing a methodology for the Residual to be applied only to 'Final Demand' on a 'Site' basis (as per the Direction); however, CMP332 is not defining these terms. CMP334 seeks to define these terms in a manner which is consistent with DCUSA and in line with paragraphs 14-17 of the Direction.

What

Currently, the CUSC has no concept of 'Final Demand' and 'Single Site', together determining a 'Final Demand Site' (i.e. a Single Site which will receive a residual fixed charge) and these definitions need to be added to allow the methodology developed under CMP332 to function.

Why

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

It is explicit in the Direction that the revised Residual methodology should use 'Final Demand' and 'Single Site' for the basis of charging. Therefore, these terms need to be defined.

The rationale for the Decision(s) made by the Authority in respect of the TCR SCR can be found in the Authority/GEMA publications relating to that SCR. NGENSO, as per Condition C10 (para 6C(a)) of its Licence, and Section 8.17.6(a) of CUSC, is required to raise CUSC Modification Proposals when Directed to do so by the Authority.

What is the solution?

Proposer's solution: 'Final Demand', 'Single Site' and 'Final Demand Site' will be defined in the legal text of the CUSC. Due to the need to ensure consistency between CUSC and DCUSA, this proposal will be developed in conjunction with DCUSA Change Proposal 359⁴ via joint workgroups.

Workgroup Considerations

The joint CMP334/DCP359 Workgroup⁵ convened twice to discuss the perceived issue, detail the scope of the proposed defect, devise potential solutions and assess the proposal in terms of the Applicable CUSC Objectives.

Related Modifications

CMP334 is one of four CUSC modifications which will change the way the Transmission Demand Residual (TDR) is calculated and charged as per [Ofgem's TCR SCR Direction](#)⁶.

- CMP332 develops a methodology for the TDR to be applied only to 'Final Demand' consumers on a 'Site' basis (as per the Direction); being a Final Demand Site. Note that a Workgroup Consultation was run for CMP332 between 6 and 27 February 2020.
- CMP334 has been raised to define "Final Demand" and "Single Site" and as a consequence what a "Final Demand Site" is.
- CMP335 and CMP336 have been raised to update the post-tariff processes within CUSC. CMP335 will address the changes required, by Ofgem's TCR SCR Direction, to Sections 3 and 11 of the CUSC and CMP336 will address the changes required, by Ofgem's TCR SCR Direction, to Section 14 of the CUSC.

⁴ DCP359 is addressing the following items as part of its consultation:

- Definition of Final Demand
- Definition of Single Site
- Definition of Final Demand Site
- Consideration of consequential changes to the arrangements for IDNOs

Consideration of consequential changes to consumers connected to private wire and complex sites

⁵ Prior to the joint CMP334/DCP359 Workgroup being convened, 2 Workgroups were held on DCP359 on 4 February 2020 and 20 February 2020. Members of CMP334 (who were not party to the discussions on DCP359) were brought up to speed at the 1st joint CMP334/DCP359 Workgroup on 2 March 2020

⁶ <https://www.ofgem.gov.uk/publications-and-updates/targeted-charging-review-decision-and-impact-assessment>

CMP334 has been run alongside the DCUSA Change Proposal DCP359⁷, which looks to mirror what CMP334 is seeking to do, but in the DCUSA, thus ensuring that the definitions of “Final Demand”, “Single Site” and “Final Demand Site” are consistent across the industry.

The table below outlines the aspects of the two TCR SCR Direction documents (one for NGENSO and another for the DNOs) that concern the TDR and in which industry code modifications these will be covered. In line with the ‘detailed plan’, the decisions from Ofgem on all these CUSC and DCUSA Modifications (with the exception of DCP361) are needed before 30 June 2020 in order to meet the 1 April 2021 Implementation Date⁸ for the CUSC Modifications.

CUSC	CMP332 Creation of a methodology to determine (i) the charging bands and (ii) the tariffs for each band.	CMP334 This will identify who will be liable to pay the TDR by defining ‘Final Demand’, ‘Single Site’ and ‘Final Demand Site’.	CMP335/CMP336 Update all of the ‘post tariff setting’ processes (e.g. band allocation, securitisation etc) to reflect the TDR methodology.	
DCUSA	DCP358 Determination of Banding Boundaries	DCP359 Customers – who should pay?	DCP360 Allocation to Bands and Interventions	DCP361 Calculation of Charges
BSC	P402 This modification aims to establish the processes and data flows to enable Elexon to collect aggregate data from DNOs and subsequently provide the required data to the National Electricity Transmission System Operator (NETSO).			

To ensure that the proposed Modifications cover the TCR SCR Decision, we have included in Annex 3 a mapping table showing which CUSC and DCUSA Modification covers which paragraph of the TCR SCR Decision.

Workgroup Consultation Question: Based on the mapping table in Annex 3, does the proposed CMP334 solution deliver Ofgem’s TCR SCR Direction? Please identify any areas you believe need to be addressed.

Scope:

CMP334 will define “Final Demand” and “Single Site”, and as a consequence, what a “Final Demand Site” is.

⁷ <https://www.dcusa.co.uk/wp-content/uploads/2020/01/DCP-359-Change-Proposal-Form-v1.0.pdf>

⁸ Implementation Date is 1 April 2022 for the DCUSA Modifications

Single Site

In Paragraph 3.57 (10) of the TCR Decision, Ofgem has stated that a “fixed charge is to be levied on a single site basis”.

Ofgem proposed the following definition for consideration:

Single Site *“means one or a collection of buildings, structures or pieces of land in close geographical proximity, owned or occupied by one customer within a defined curtilage on one site, where each building, structure or piece of land serves the other in some necessary or reasonably useful way.”*

There was a majority view from the Working Group to keep the definition of a ‘Single Site’ as simple as possible and, for distribution-connected sites, relate it to a Connection Agreement (whether that be in the form of the National Terms of Connection or a Bespoke Connection Agreement).

Specifically, for sites directly connected to the Transmission system, The Proposer has proposed that a “Single Site” equates to the “Connection Site” as this is what defines a site in the Bilateral Connection Agreement. If a party then splits the “Single Site”, it will need a new Bilateral Connection Agreement in order for it to be a different “Single Site”.

Following consideration of Ofgem’s proposed definition and the view of the Proposer, the Workgroup agreed the following definition to be consulted upon:

Single Site *“shall mean the **Connection Site** as defined in the **Bilateral Connection Agreement**.”*

Workgroup Consultation Question: Do you agree with the proposed definition of “Single Site”. If not, why not?

Final Demand

In paragraph 3.57 (1) of the TCR Decision, Ofgem has defined Final Demand as *“electricity which is consumed other than for the purposes of generation or export onto the electricity network”*. Ofgem has made it clear that code modifications to implement the TCR Decision must be based on this definition, and therefore this is the definition which will be used in the CUSC.

Final Demand Site

The Proposer intends to exclude certain sites from being classed as a “Final Demand Site”. Specifically, the Proposer is seeking to maintain the status quo and ensure that licensed parties that do not currently pay TNUoS (specifically Interconnectors and Distribution Network Operators) are not included in the definition of “Final Demand Site”.

The Workgroup noted that the TCR Direction to NGENSO does not explicitly exclude Interconnectors and Distribution Network Operators from paying the Transmission Demand Residual if they meet the ‘Final Demand’ definition. The Workgroup were content why Distribution Network Operators would be excluded, as otherwise the same demand would be charged the Transmission Demand Residual twice.

However, some Workgroup members sought clarity on how interconnection volumes would be managed in the following two scenarios;

1. Interconnection between networks within GB; and
2. Interconnection between GB and other EU member states

The Proposer confirmed the following:

- Most licensed interconnectors connect GB to other EU member states; however, Moyle connects to Northern Ireland which is not a separate EU member state. The Proposer's understanding is that, since Northern Ireland is part of the single island of Ireland energy market and electricity system, Moyle would be treated as any other interconnector connecting to an EU member state as it affects the system/market of an independent EU member state; and
- Licensed Interconnector volumes would be removed from the total amount of the Transmission Demand Residual TNUoS charge to be recovered rather than smeared across other parties.

Interconnection between networks within GB (e.g. Transmission Owner to Transmission Owner or DNO/iDNO to DNO/iDNO) is treated differently between Transmission (which has no charges) and Distribution (charges would apply as per the DCUSA methodology).

The Workgroup noted the Proposer's view as to the definition of a "Final Demand Site", which was to adopt a binary assessment, whereby if the Single Site has associated Final Demand, it is classified as a "Final Demand Site".

Some Workgroup Members considered it may be better to define a threshold whereby if Final Demand at a site is equal to or greater than total demand (i.e. Final Demand plus non-Final Demand) by (e.g.) 80%⁹, it is then classified as a "Final Demand Site". However, some Workgroup Members were concerned how to identify what a sensible threshold is. A DNO Workgroup member noted that each DNO is currently carrying out analysis utilising the Frontier Economics Methodology¹⁰ as set out in DCP359.

Following consideration of the view of the Proposer, the Workgroup agreed the following definition to be consulted on:

Final Demand Site "Shall mean;

1. For **Users** with a **Bilateral Connection Agreement**, a **Single Site** which has associated **Final Demand**, except **Single Sites** which are for;
 - a. **Users** who own or operate a **Distribution System**, or
 - b. **Interconnector Users**, or
 - c. the purposes of operating an **Eligible Facility** with a valid **Certification**
2. For **Users** with a **Bilateral Embedded Generation Agreement**, as defined as 'Final Demand Site' in the **DCUSA** except **Single Sites** which are for the purposes of operating an **Eligible Facility** with a valid **Certification**
3. For all other parties, as defined as 'Final Demand Site' in the **DCUSA**"

Workgroup Consultation Question: Do you agree with the proposed definition of "Final Demand Site". If not, why not?

⁹ 80% is an example threshold for illustrative purposes

¹⁰ For clarity, the DNOs will be using the Methodology, not the results of Frontier Economics' analysis

The Workgroup also discussed the process whereby a User¹¹ (as defined in CUSC) can demonstrate they do not meet the “Final Demand Site” definition. There was general agreement that it would be for the User to self-declare that they are using demand for the sole purpose of storage or generation at the site in question. If they are later proved to have submitted a false declaration, then that party would be in breach of CUSC.

In the legal text the Proposer has suggested that:

Certification “Shall mean a statement to be submitted by the **Registrant** of the relevant **BM Unit** or **BM Units**, which is signed by one of the **Eligible Facility’s** registered Directors that confirms the specific **BM Units** which only perform activities necessary for **Electricity Storage** and/or **Electricity Generation** and is submitted to **The Company**. The validity of a **Certification** is determined by **The Company**.”

The Proposer noted that this “Certification” process will only apply for those sites that have a direct relationship with ESO (i.e. Transmission Connected sites with BCAs and Distribution Connected sites with BEGAs) and that DCUSA would cover all other eventualities.

Workgroup Consultation Question: Do you believe the Certification process described in the legal text is fit for purpose? If not, why not?

However, the Workgroup noted that Private Wire / Behind the Meter sites would be unable to sign this declaration because they do have some demand. Therefore, they would be charged the Transmission Demand Residual TNUoS charge unless they entered into a new agreement with the DNO and installed separate Boundary Metering to prove they are using demand for the sole purpose of storage or generation.

The Workgroup also understood that Generation sites that are commissioning or decommissioning but are using demand to commission or decommission would be captured by the definition of Final Demand and therefore be liable for the Transmission Demand Residual TNUoS charge. However, other Workgroup members noted that such demand was only for the purpose of generation (be that commissioning or decommissioning).

Draft Legal text

The Proposer has prepared the following legal text for consideration:

Term	Definition
Certification	Shall mean a statement to be submitted by the Registrant of the relevant BM Unit or BM Units , which is signed by one of the Eligible Facility’s registered Directors that confirms the specific BM Units which only perform activities necessary for Electricity Storage and/or Electricity Generation and is submitted to The Company . The validity of a Certification is determined by The Company .

¹¹ The intention of the declaration is that this only applies to NETS connected Users (who will be CUSC signatories)

Distribution Connection and Use of System Agreement or “DCUSA”	Means the Distribution Connection and Use of System Agreement established pursuant to the Distribution Licence as revised from time to time.
Electricity Generation	The process of generating electricity by a Generator .
Electricity Storage	The conversion of electrical energy into a form of energy which can be stored, the storing of that energy, and the subsequent reconversion of that energy back into electrical energy.
Eligible Facility	Means a facility at which Electricity Storage or Electricity Generation occurs and that has an export Metering System and an import Metering System with associated metering equipment which only measures export from Electricity Generation and/or Electricity Storage and import for or directly relating to Electricity Generation and/or Electricity Storage (and not export from another source or import for another activity), which is subject to Certification .
Final Demand	Means electricity which is consumed other than for the purposes of generation or export onto the electricity network
Final Demand Site	<p>Shall mean;</p> <ol style="list-style-type: none"> 1. For Users with a Bilateral Connection Agreement, a Single Site which has associated Final Demand, except Single Sites which are for; <ol style="list-style-type: none"> a. Users who own or operate a Distribution System, or b. Interconnector Users, or c. the purposes of operating an Eligible Facility with a valid Certification 2. For Users with a Bilateral Embedded Generation Agreement, as defined as ‘Final Demand Site’ in the DCUSA except Single Sites which are for the purposes of operating an Eligible Facility with a valid Certification 3. For all other parties, as defined as ‘Final Demand Site’ in the DCUSA
Generation Licensee	A User who holds a Generation Licence
Generator	As defined in the Grid Code
Single Site	Shall mean the Connection Site as defined in the Bilateral Connection Agreement .

Existing CUSC/Grid Code/BSC terms used:

Term	Definition
Bilateral Connection Agreement	An agreement entered into pursuant to Paragraph 1.3.1 a form of which is set out in Exhibit 1 to Schedule 2.
BM Unit	Means a Primary BM Unit established and registered (or to be established and registered) by a Party in accordance with Section K3 or a Secondary BM unit established and registered (or to be established and registered) by a Party in accordance with Section K8 or, where the context so requires, the Plant and/or Apparatus treated as comprised in or assigned to such unit for the purposes of the Code.
Connection Site	Each location more particularly described in the relevant Bilateral Agreement at which a User's Equipment and Transmission Connection Assets required to connect that User to the National Electricity Transmission System are situated (or, in the case of OTSDUW Build, each location that will become such from the OTSUA Transfer Time and, until the OTSUA Transfer Time, is the location where the User's Equipment connects to the OTSUA). If two or more Users own or operate Plant and Apparatus which is connected at any particular location that location shall constitute two (or the appropriate number of) Connection Sites.
Directly Connected Users	A large, usually industrial, consumer of electricity who is directly connected to the National Electricity Transmission System.
Distribution System	The system consisting (wholly or mainly) of electric lines owned or operated by any Authorised Electricity Operator and used for the distribution of electricity from Grid Supply Points or generation sets or other entry points to the point of delivery to Customers or Authorised Electricity Operators, and includes any Remote Transmission Assets operated by such Authorised Electricity Operator and any electrical plant and meters owned or operated by the Authorised Electricity Operator in connection with the distribution of electricity, but shall not include any part of the National Electricity Transmission System.
Generation License	The licence granted to a Generator pursuant to section 6(1)(a) of the Act.
Generator	A person who generates electricity under licence or exemption under the Act acting in its capacity as a generator in Great Britain or Offshore. The term Generator includes a

	EU Generator and a GB Generator.
Grid Code	The Grid Code drawn up pursuant to the Transmission Licence, as from time to time revised in accordance with the Transmission Licence.
Interconnector User	(a) in relation to an Interconnector connected to the National Electricity Transmission System, as defined in the Balancing and Settlement Code; and (b) in relation to a Distribution Interconnector, a Lead Party (as defined in the Balancing and Settlement Code) in respect of a single BM Unit where under Section K5 of the Balancing and Settlement Code the BM Unit has been allocated in relation to that Distribution Interconnector or if there is no such allocation, as defined in the Balancing and Settlement Code.
Metering System	Means particular commissioned Metering Equipment, subject to and in accordance with Section K1.6.
Registrant	Means, in relation to a Metering System, the person for the time being registered in CMRS or (as the case may be) SMRS in respect of that Metering System pursuant to Section K.
Supplier	A person who holds a Supply Licence.
The Company	National Grid Electricity System Operator Limited (No:11014266) whose registered office is at 1-3 Strand, London, WC2N 5EH as the holder of the Transmission Licence.

Full table of Grid Code definitions –

<https://www.nationalgrideso.com/document/33836/download>

Full table of CUSC Definitions -

<https://www.nationalgrideso.com/document/91396/download>

What is the impact of this change?

Who will it impact?

Whilst this proposal will not directly affect any party, it will have large impacts on some users when combined with other modifications resulting from the TCR. This is a large-scale change that will require amendments and consequential changes to all Supplier and DNO processes whilst also affecting all demand users.

What are the positive impacts?

The Authority has established that there are consumer benefits to this change due to flexible customers no longer being able to avoid the costs of residual transmission charges.

Proposer's Assessment against Code Objectives

Impact of the modification on the Code objectives:	
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).	

NGESO has been directed to raise and implement this modification by the Authority to enact their SCR Decision. This modification will also improve the efficiency of the CUSC arrangements by defining terms which will be used as part of the Residual methodology and ensuing alignment with DCUSA.

Workgroup Consultation Question: Do you believe that CMP334 Original proposal better facilitates the Applicable CUSC Objectives?

When will this change take place?

This proposal needs to be implemented as soon as possible after approval by the Authority ahead of use of system charges which will be effective from 1 April 2021, to allow NGENSO to comply with the Direction letter published by The Authority on the 21 November 2019.

For NGENSO to be able to meet the Implementation Date of 1 April 2021¹², a decision on CMP334 is required from Ofgem by the end of June 2020 to enable NGENSO to undertake the necessary system changes and gather the data required in order to set the applicable charges.

Workgroup Consultation Question: Do you support the proposed implementation approach for CMP334?

¹² Note that the Implementation Date for DCP-359 is 1 April 2022; however DCP-359 still needs a decision by end June 2020 to meet the 1 April 2022 Implementation Date as DNOs are required to provide notification of changes to Use of System charges 15 months' ahead of when they will come into effect.

Standard Workgroup Consultation questions:

1. Do you believe that CMP334 Original proposal better facilitates the Applicable CUSC Objectives?
2. Do you support the proposed implementation approach for CMP334?
3. Do you have any other comments?
4. Do you wish to raise a Workgroup Consultation Alternative request¹³ for the Workgroup to consider?

Specific Workgroup Consultation questions:

5. Based on the mapping table in Annex 4, does the proposed CMP334 solution deliver Ofgem's TCR SCR Direction? Please identify any areas you believe need to be addressed?
6. Do you agree with the proposed definition of "Single Site"? If not, why not.
7. Do you agree with the proposed definition of "Final Demand Site"? If not, why not.
8. Do you believe the Certification process described in the legal text is fit for purpose? If not, why not?

How to respond

The Workgroup is seeking the views of CUSC Users and other interested parties in relation to the issues noted in this document and specifically in response to the questions above.

Please send your response to cusc.team@nationalgrideso.com using the response pro-forma which can be found on the National Grid ESO website via the following link: <https://www.nationalgrideso.com/codes/connection-and-use-system-code-cusc/modifications/cmp334-transmission-demand-residual>

In accordance with Governance Rules if you wish to raise a Workgroup Consultation Alternative Request please fill in the form that can be located at the following link or get in contact with us via email at cusc.team@nationalgrideso.com

<https://www.nationalgrideso.com/codes/connection-and-use-system-code-cusc>

If you wish to submit a confidential response, please note that information provided in response to this consultation will be published on National Grid ESO's website unless the response is clearly marked "Private & Confidential", we will contact you to establish the extent of the confidentiality. A response marked "Private & Confidential" will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the CUSC Modifications Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response. Please note an automatic confidentiality disclaimer generated by your IT System will not in itself, mean that your response is treated as if it had been marked "Private and Confidential".

¹³ The form for raising this has been uploaded alongside the CMP334 Workgroup Consultation

Acronym table and reference material

Acronym	Meaning
BEGA	Bilateral Embedded Generator Agreement
BSC	Balancing and Settlement Code
CMP	CUSC Modification Proposal
CUSC	Connection and Use of System Code
DCP	Distribution Code Proposal
DCUSA	Distribution Connection and Use of System Agreement
DNO	Distribution Network Operator
iDNO	Independent Distribution Network Operator
NETSO	National Electricity Transmission System Operator
NGESO	National Grid Electricity System Operator
NHH	Non Half Hourly
PID	ENA Targeted Charging Review Project Initiation document
SCR	Significant Code Review
TNUoS	Transmission Network Use of System
TCR	Targeted Charging Review
TDR	Transmission Demand Residual

Reference material:

1. [Ofgem direction letter to NGESO](#)
2. [Ofgem Targeted Charging Review decision](#)
3. [ENA Targeted Charging Review Project Initiation document](#)

Annexes

Annex	Information
Annex 1	CMP334 Proposal Form
Annex 2	CMP334 Terms of Reference
Annex 3	Transmission Demand Residual Cross Code Mapping