

CUSC Alternative Form

CMP298 WACM1:

Overview: Removal of an explicit approval step by ESO in the process

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What is the proposed alternative solution?

The basic process should be based on the DNO providing a monthly update which is incorporated into a revised BCA for signature by both parties. In the case of issues arising then defined timescales to engage to resolve the issues should be defined.

Any explicit recourse for the ESO should be limited to extreme cases. The materiality of when these can be used should be clearly defined, for example, if a DNO made an error and provided an update that had acceptances over the Planning Limit.

What is the difference between this and the Original Proposal?

The Original Proposal includes process steps that include an approve/reject step which is in conflict with the described intention of the process to allow DNOs to make connection offers setting out the transmission impact within the DNO's licence timescales which can then be accepted by the customer without further reference to the ESO.

Having a process that includes an ESO approve/reject stage undermines this intent as it creates a commercial uncertainty and conflicts with the stated intention that the acceptance can be without further reference to the ESO.

For the process to work in line with the described intention, then the changes proposed by the DNO should be deemed to have been accepted and be incorporated into a revised BCA for signature by both parties. This is inherently conditional on the process having been followed and the criteria met, for example, the DNO cannot exceed the Planning Limit threshold. This ensures that there is adequate protection for the ESO as it can, by exception, raise issues and therefore is not detrimental to the ESO.

What is the impact of this change?

Proposer's Assessment against CUSC Non-Charging 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: There are new obligations on whole system and this removes commercial uncertainty for customers connecting at Distribution
(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;	Positive: The removal of this step will give more commercial certainty to Distributed Generation customers wishing to connect. The ESO can raise, by exception, issues and therefore there is no detriment to the ESO.

(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: The removal of this step will remove a process step that undermines the stated intention of this change i.e. to allow DNOs to make connection offers setting out the transmission impact within the DNO's licence timescales which can then be accepted by the customer without further reference to the ESO.
*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).	

When will this change take place?

Implementation date:

As per CMP298 Original

Implementation approach:

As per CMP298 Original

Acronyms, key terms and reference material

Acronym / key term	Meaning
BCA	Bilateral Connection Agreement
DNO	Distribution Network Operator
ESO	Electricity System Operator

Reference material:

1. None