

CUSC Alternative Form – Non Charging

CMP434 Alternative Request 15

Overview: Remove DFTC from the proposed solution. DFTC is proposed as a forecast however existing DNO datasets already indicate this in the same way DFTC is intended to e.g. connections application data and the ECR's confirm the relevant generation applicants and the upstream GSP's at DNO level.

Proposer: Grant Rogers, Q-Energy Sustainable Investments Ltd

I/We confirm that this Alternative Request proposes to modify the non - charging section of the CUSC only

What is the proposed alternative solution?

Remove DFTC from the proposal.

What is the difference between this and the Original Proposal?

This will differ from the Original proposal in that it will not require a new process to forecast DNO application data to the ESO.

DNO's have limited ability, outside of the existing connections data on applications received on their system, to forecast capacities on their system.

Any movement away from utilising the existing data (e.g. generator connections data and the ECR) falls into the territory of the FES which is not designed for this process.

If a DFTC process is needed for wider forecasting of generation this sits outside of the Proposal and can be codified, if required, separate to this proposal.

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;	None
(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: Effectively does create efficiencies by utilising existing data sets and removing the need for a new process to facilitate the same outcome within the proposal.
*The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.	

When will this change take place?

Implementation date:

January 2025 or in line with implementation of CMP434 if the start date is delayed.

Implementation approach:

Reference to DFTC to be removed and proposal to include requirement of DNO's to submit up to date ECR data and relevant connection data in line with the timescales that would have been required for the DFTC deadline for Gate 1.

Acronyms, key terms and reference material

Acronym / key term	Meaning
DFTC	Distribution Forecasted Transmission Capacity
DNO	Distribution Network Operator
ESO	Electricity System Operator
ECR	Embedded Capacity Register
FES	Future Energy Scenarios
GSP	Grid Supply Point