

CUSC Alternative Form – Non Charging

CMP434 Alternative Request 21

Overview: Reintroduction of Element 14 and to remove the current proposed restrictions to build capacity outside of the red line boundary.

Proposer: Epsilon Generation Limited, Philip John

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

What is the proposed alternative solution?

This alternative will remove the current proposed restrictions regarding building outside of the Gate 2 Red-Line Boundary (**RLB**) and reintroduce the ability to shift the project. Namely, that whatever capacity is built within the original RLB, only 50% of that number can then be located outside of the original RLB. Where this calculation results in a number that is less than the total contracted capacity, the total contracted capacity will be reduced accordingly to a revised total contracted capacity. This requirement is detailed in Element 11.3 of the consultation.

The restriction on this ability to build outside the RLB, is that the connection point and connection infrastructure must remain the same as what is given in the Gate 2 offer.

So long as the connection point and connection infrastructure remain unchanged, the precise location of the generation build has no impact on the network.

Technology/economical restrictions on the developer will mean that the generation has to be built within a reasonable distance and to appropriate codes/standards.

The focus of the group needs to be on facilitating fast connections and the introduction of Red Line Boundaries create obstacles for developments to reach Ready to Build quickly. If a higher bar is required to be placed in the connection queue, then this needs to come in the form of planning permissions.

This Alternative proposes to remove this unnecessary restriction, to allow Developers to respond appropriately to unforeseen circumstances that may occur during the normal project development cycle.

What is the difference between this and the Original Proposal?

The difference between this Alternative and the Original is that the restriction on building outside the RLB is removed. This would allow a project to build the required capacity outside the RLB provided that the connection point and transmission infrastructure remain unchanged.

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 – This alternative allows viable projects to adapt to issues that arise during the planning and build process. Economical/ technical restrictions on building far away from a connection point will mean that projects will always be built within a reasonable distance to the connection point.
(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 – This allows projects to adapt to planning and build issues. It doesn’t differentiate between technology and between technologies that are energy dense with regards to land.
(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.	None
*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:

1 January 2025 - Same date as the implementation of [CMP434](#)

Implementation approach:

As per Original