

CUSC Alternative Form – Non Charging

CMP434 Alternative Request 18

Overview: We would like the existing Allowable change rules to remain in place, and for us not to adopt the proposed significant change element.

Proposer: Luke Scott Northern Powergrid

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

What is the proposed alternative solution?

- **Element 4. Significant Modification Applications**
 - The current proposal does not align with the current ENA guidance NPg use for '**Allowable Change**' the two points in question are below:
 - Request to change generation technology type or mix of generation technology types from any one technology type (or mix of technology types) to a different technology type (or mix of technology types) and;
 - Request to change location for the Point of Supply (PoS).
 - We feel **Element 4** will discriminate against the customers in the queue awaiting connection date who are 'shovel ready' with a secured land location and technology that won't change (they don't need to change) we agree with all other parts within Element 4 Significant Modification Applications except the above.
 - **Work group alternative:** We feel the process should mirror the '**as is**' listed in the current Allowable change ENA guidance document.

What is the difference between this and the Original Proposal?

1. Request to change generation technology type or mix of generation technology types from any one technology type (or mix of technology types) to a different technology type (or mix of technology types) and;
2. Request to change location of the Point of Supply (PoS).

What is the impact of this change?

Both of these changes are classified as Disallowable Change, meaning the customer would have to make a new application to the DNO and would lose their current position queue position.

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: I don't believe it makes it fair for customers to change location or technology. This does not help with connecting people efficiently.
(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;	Negative: I don't believe it makes it fair for customers to change location or technology. This does not help with connecting people efficiently. Projects should have planned well in advance to ensure the right solution.

(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and	None: no impact
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	Negative: There is guidance in place now that we follow as DNOs follow. We believe this goes against the whole premise of shovel ready.
*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:

We are proposing that the existing policy currently in place in the [ENA Open Networks Template \(energynetworks.org\)](https://www.energynetworks.org) should remain.

Implementation approach:

No change required.

Acronyms, key terms and reference material

Acronym / key term	Meaning
ENA	Energy Networks Association
NPg	Northern Powergrid
PoS	Point of Supply

Reference material:

1. [ENA Open Networks Template \(energynetworks.org\)](https://www.energynetworks.org)