

Final Self-Governance Modification Report

<p>CM0100: Consequential modification following the implementation of CMP428 User Commitment liabilities for Onshore Transmission (reinforcement) in the Holistic Network Design</p> <p>Overview: This modification seeks to align changes made to definitions within the CUSC as a result of the approval and implementation of CUSC modification, CMP428 (User Commitment liabilities for Onshore Transmission (reinforcement) in the Holistic Network Design), to ensure consistency between the codes.</p>	<p>Modification process & timetable</p> <table border="1"> <tr> <td>1</td> <td>Proposal Form 03 July 2024</td> </tr> <tr> <td>2</td> <td>Code Administrator Consultation 05 August 2024 to 03 September 2024</td> </tr> <tr> <td>3</td> <td>Draft SG Modification Report 17 September 2024</td> </tr> <tr> <td>4</td> <td>Final SG Modification Report 26 September</td> </tr> <tr> <td>5</td> <td>Appeals Window 04 October 2024 to 24 October 2024</td> </tr> <tr> <td>6</td> <td>Implementation Date 31 October 2024</td> </tr> </table>	1	Proposal Form 03 July 2024	2	Code Administrator Consultation 05 August 2024 to 03 September 2024	3	Draft SG Modification Report 17 September 2024	4	Final SG Modification Report 26 September	5	Appeals Window 04 October 2024 to 24 October 2024	6	Implementation Date 31 October 2024
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Have 20 minutes? Read the full [Final SG Modification Report](#)
Have 30 minutes? Read the full Final SG Modification Report and Annexes.

Status summary: The Panel has made their determination vote and an Appeals Window has opened.

Panel recommendation/determination:
 The Panel has determined unanimously that the Proposer’s solution be implemented.

This modification is expected to have a: **Low impact** on ESO and Transmission Owners (TOs)

Governance route	Self-Governance modification to proceed to Code Administrator Consultation	
Who can I talk to about the change?	<p>Proposer: David Halford david.halford@nationalgrideso.com 07812 774065</p>	<p>Code Administrator Chair: Elana Byrne Elana.byrne@nationalgrideso.com 07749576706</p>
Appeals window	If you want to appeal this decision, please send your appeals form and relevant documentary evidence to industrycodes@ofgem.gov.uk by 5pm on 24 October and inform the Code Administrator by emailing STCteam@nationalgrideso.com that an appeal has been submitted.	

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What is the issue?

CUSC modification, CMP428 (User Commitment liabilities for Onshore Transmission (reinforcement) in the Holistic Network Design), was approved by The Authority on 11 June 2024, and implemented into the CUSC on 14 June 2024. The modification ensures that User Commitment liabilities for onshore transmission (reinforcement) circuits in the Holistic Network Design (HND), will not be classified as Attributable Works. The modification introduced changes to the definition of “Attributable Works” and the creation of a new definition of “Excepted Works.” The “Attributable Works” definition is also included within the STC and should be aligned with the CUSC. The new definition of “Excepted Works” is not included in the STC and this has created inconsistency across the codes.

Why change?

To ensure consistency between the CUSC and STC, the definition of “Attributable Works” should be updated in the STC and include the new definition of “Excepted Works,” which was introduced as part of CMP428.

What is the solution?

Proposer’s solution

To update the “Attributable Works” definition and add in the new definition of “Excepted Works” within Section J (Interpretations and Definitions) of the STC.

Legal text

The legal text for this change can be found in **Annex 1**

What is the impact of this change?

Proposer’s assessment against STC Objectives	
Relevant Objective	Identified impact
(a) efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act	Neutral
(b) development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission	Neutral
(c) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity	Neutral
(d) protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees	Neutral
(e) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC	Positive Ensures consistency between the CUSC and STC and removes ambiguity in respect of the definitions the proposal is updating.

(f) facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;	Neutral
(g) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.	Neutral

Proposer’s assessment of the impact of the modification on the stakeholder / consumer benefit categories	
Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Neutral
Lower bills than would otherwise be the case	Neutral
Benefits for society as a whole	Neutral
Reduced environmental damage	Neutral
Improved quality of service	Neutral

Code Administrator Consultation Summary

The Code Administrator Consultation was issued on 05 August 2024 closed on 03 September and received 3 responses. A summary of the response can be found in the table below, and the full responses can be found in **Annex 4**.

Code Administrator Consultation Summary	
Question	
Do you believe that the CM0100 Original Proposal better facilitates the STC Applicable Objectives?	All respondents believed that the Proposal better facilitated objective (e) as it added continuity between CUSC an STC modifications.
Do you support the proposed implementation approach?	All respondents supported the proposed implementation.
Do you have any other comments?	One respondent reiterated that the proposal was raised to ensure consistency between the CUSC and STC codes.

Panel Determination Vote

The Panel met on 25 September 2024 to carry out their determination vote.

They assessed whether a change should be made to the STC by assessing the proposed change and any alternatives against the Applicable Objectives

Vote 1: Does the Original facilitate the Applicable Objectives better than the Baseline?

Panel Member: **Claire Newton, ESO**

	Better facilitate s AO (a)?	Better facilitate s AO (b)?	Better facilitate s AO (c)?	Better facilitate s AO (d)?	Better facilitate s AO (e)?	Better facilitate s AO (f)?	Better facilitate s AO (g)?	Overall (Y/N)
Original	-	-	-	-	Yes	-	-	Yes
Voting Statement								
The proposal has been raised to ensure consistency is maintained between the CUSC and STC in respect of the definitions that require amending/introducing into the STC and represent no materiality to Transmission Owners.								

Panel Member: **Harriet Eckweiler, SHET**

	Better facilitate s AO (a)?	Better facilitate s AO (b)?	Better facilitate s AO (c)?	Better facilitate s AO (d)?	Better facilitate s AO (e)?	Better facilitate s AO (f)?	Better facilitate s AO (g)?	Overall (Y/N)
Original	-	-	-	-	Yes	-	-	Yes
Voting Statement								
No voting statement provided								

Panel Member: **Gareth Williams, SPT**

	Better facilitate s AO (a)?	Better facilitate s AO (b)?	Better facilitate s AO (c)?	Better facilitate s AO (d)?	Better facilitate s AO (e)?	Better facilitate s AO (f)?	Better facilitate s AO (g)?	Overall (Y/N)
Original	-	-	-	-	Yes	-	-	Yes
Voting Statement								
As the CUSC Modification CMP428 has already been implemented, with respect of this STC proposal we believe it reflects the implementation of CMP428 text into the STC so meets objective (e). As such, we are happy to support this proposal.								

Panel Member: **Mike Lee, OFTO**

	Better facilitate s AO (a)?	Better facilitate s AO (b)?	Better facilitate s AO (c)?	Better facilitate s AO (d)?	Better facilitate s AO (e)?	Better facilitate s AO (f)?	Better facilitate s AO (g)?	Overall (Y/N)
Original	Yes	Yes	Yes	-	-	Yes	-	Yes
Voting Statement								
The OFTOs strongly support this proposed modification which follows the principles established for earlier initiatives such as TIRG.								

Panel Member: **Richard Woodward, NGET**

	Better facilitate s AO (a)?	Better facilitate s AO (b)?	Better facilitate s AO (c)?	Better facilitate s AO (d)?	Better facilitate s AO (e)?	Better facilitate s AO (f)?	Better facilitate s AO (g)?	Overall (Y/N)
Original	-	Yes	Yes	-	-	Yes	-	Yes
Voting Statement								
The modification ensures adequate and efficient updates to STC definitions to facilitate a recently approved CUSC code change.								

Vote 2 – Which option best meets the Applicable Objectives?

Panel Member	Best Option	Which objectives does this option better facilitate? (If baseline not applicable).
Claire Newton	Original	e
Harriet Eckweiler	Original	e
Gareth Williams	Original	e
Mike Lee	Original	a, b, c, f
Richard Woodward	Original	b, c, f

Panel conclusion

The Panel has determined unanimously that the Proposer’s solution be implemented.

When will this change take place?

Implementation date

31 October 2024

Date decision required by

NA

Implementation approach

There will be no system changes required as a result of this modification

Interactions

- Grid Code BSC CUSC SQSS
- European Other Other
- Network Codes modifications

This proposal is required due to the approval of CUSC Modification, CMP428 which was implemented into the CUSC on 14 June 2024.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
SG	Self-Governance
CM	Code Modification
CMP	Code Modification Proposal
CUSC	Connection and Use of System Code
EBR	Electricity Balancing Regulation
HND	Holistic Network Design
STC	System Operator Transmission Owner Code
STCPs	System Operator Transmission Owner Code Procedures
SQSS	Security and Quality of Supply Standards
T&Cs	Terms and Conditions
OFTOs	Offshore Transmission Owners
TIRG	Transmission Investment for Renewable Generation

Reference material

[CMP428 User Commitment Liabilities for Onshore Transmission Reinforcement in the Holistic Network Design](#)

Annexes

Annex	Information
Annex 1	Legal text
Annex 2	Self-Governance Statement
Annex 3	Proposal Form
Annex 4	Code Administrator Consultation responses