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## CUSC Modification Proposal Form

# CMP443: Removing references to “Fax” or “Facsimile” within the CUSC

**Overview:** This modification seeks to remove references to “fax” and “facsimile” from the CUSC in order to reflect both current and future methods of communication between relevant Users and the National Energy System Operator (NESO) due to the national decommissioning of the Public Switched Telephone Network (PSTN).

### Modification process & timetable



**Status summary:** The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.

### This modification is expected to have a: **Medium impact**

Generators, Demand Users, Interconnectors, Distribution Network Operators, NESO

<b>Proposer’s recommendation of governance route</b>	Standard Governance modification to proceed to Code Administrator Consultation	
<b>Who can I talk to about the change?</b>	<p><b>Proposer:</b></p> <p>David Halford</p> <p><a href="mailto:David.halford@nationalenergyso.com">David.halford@nationalenergyso.com</a></p> <p>07812 774065</p>	<p><b>Code Administrator Contact:</b></p> <p>Code Admin</p> <p><a href="mailto:Cusc.team@nationalenergyso.com">Cusc.team@nationalenergyso.com</a></p>

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## What is the issue?

NESO currently use fax machines within the Electricity National Control Centre to send and receive data from Primary and some Secondary Balancing Mechanism Units (BMUs). A number of these data submissions from BMUs support critical functions such as System Restoration, by transmitting data such as Unit Availability. Fax machines are ageing technology, with hardware support contracts ending (or have ended) and replacement parts difficult to source. The management of paper output is also time-consuming for reporting and audit purposes.

## Why change?

The Public Switched Telephone Network (PSTN) that fax machines use, is due to be switched off by the start of 2027<sup>1</sup> which will result in all non-voice services that use this network ceasing. In readiness for the PSTN switch off, an alternative method of communication between relevant Users and NESO will need to be established to ensure current interactions can continue. It should also maintain the stability and audit trail that the current fax solution provides.

## What is the proposer’s solution?

While there is an option to upgrade existing faxes to utilise digital line technology (via a digital adapter), this still does not address the current issues with the use of faxes in terms of hardware support and paper management. With this in mind, we believe a more future proof digital solution is required that provides the same functionality of the current fax solution but improves efficiencies and costs for Users.

The proposed solution, (to be defined under an “umbrella term” as the “Designated Information Exchange System”, will be an Azure based platform which will allow both Users and NESO to provide web form submissions and acknowledgements which are currently transmitted via fax through the use of paper forms.

The platform will be accessed through the Users Internet Service Provider (ISP) via a secure, encrypted login which will be maintained and administered by NESO.

The platform will require no software licence obligations from the User and will be designed to be extendable to ensure any future requirements can be incorporated, and scalable to accommodate both existing and future Users.

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<sup>1</sup> <https://business.bt.com/why-choose-bt/insights/digital-transformation/uk-pstn-switch-off/>

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It is proposed that a phased approach will be introduced following the implementation of the proposal with Users being moved across to the new platform over a period of time that we will be agreed. The rationale for a phased approach is to ensure Users are fully comfortable with the use of the new platform prior to the phase out of fax machines.

The proposed new definition of the “Designated Information Exchange System”, will also include “facsimile” in order for the solution to accommodate the phased roll out of the platform from the implementation of the proposed changes where both the use of faxes and the platform will be in use.

This proposal will also take the opportunity to update references to fax or facsimile within the CUSC that relate to “non-Control Room” activities. For example, Connections Compliance to reflect the current methods of communication that now takes place for these interactions, such as email.

### **Draft legal text**

See Annex 1 which details the proposed changes across the CUSC.

## **What is the impact of this change?**

<b>_Proposer’s assessment against CUSC Non-Charging Objectives</b>	
<b>Relevant Objective</b>	<b>Identified impact</b>
(a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;	<b>Positive</b> Key communications relating to processes such as system restoration should be more efficient in relation to data transfer and response times
(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;	<b>Neutral</b>
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and	<b>Neutral</b>

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(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	<p><b>Positive</b></p> <p>The proposal should create efficiencies in relation to communication between Users and NESO and replace outdated technologies.</p>
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\*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.

**Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories**

<b>Stakeholder / consumer benefit categories</b>	<b>Identified impact</b>
Improved safety and reliability of the system	<p><b>Positive</b></p> <p>There could be a slight improvement from a system safety point of view as key communications relating to processes such as system restoration should be more efficient in relation to data transfer and response times.</p>
Lower bills than would otherwise be the case	<p><b>Neutral</b></p>
Benefits for society as a whole	<p><b>Neutral</b></p>
Reduced environmental damage	<p><b>Positive</b></p> <p>This proposal will eliminate paper and plastic wastage in respect of the printing of faxes and the need for fax ink toner cartridges.</p>
Improved quality of service	<p><b>Positive</b></p> <p>The new process will introduce efficiencies for both Users and NESO which should result in an improved quality of service from a communications point of view.</p>

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## When will this change take place?

### Implementation date

10 working days after Authority decision date.

### Date decision required by

As soon as possible.

### Implementation approach

It is proposed that a phased approach will be introduced following the implementation of the proposal with Users being moved across to the new platform over a period of time that we will be agreed. The rationale for a phased approach is to ensure Users are fully comfortable with the use of the new platform prior to the phase out of fax machines.

### Proposer's justification for governance route

Governance route: Standard Governance modification to proceed to Code Administrator Consultation

We believe these proposed changes will have a positive impact for Users with the removal of outdated technology.

Updates have also been shared at the Transmission Charging and Methodologies Forum (TCMF) as the project has progressed with feedback incorporated into the proposed solution.

We believe this modification should proceed straight to Code Administrator Consultation as we are not seeking to add or remove any of the current actions that take place between NESO and Users but purely amend the method that these actions are communicated.

The proposed changes will also result in Users being able to continue with the use of fax after implementation while the phased roll out of the new platform takes place.

## Interactions

Grid Code

BSC

STC

SQSS

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European Network  EBR Article 18 T&Cs<sup>2</sup>  Other  Other

Codes modifications

Changes will also be required to the Grid Code and STC Procedures to reflect the changes that are being proposed to the CUSC in respect of the removal of references to Fax and Facsimile.

While we believe that EBR interactions do exist, we believe these to be minimal.

### Acronyms, key terms and reference material

Acronym / key term	Meaning
API	Application Programming Interface
BMU	Balancing Mechanism Unit
BSC	Balancing and Settlement Code
CMP	CUSC Modification Proposal
CUSC	Connection and Use of System Code
EBR	Electricity Balancing Regulation
ISP	Internet Service Provider

### Annexes

Annex	Information
Annex 1	Legal Text

<sup>2</sup> If your modification amends any of the clauses mapped out in Exhibit Y to the CUSC, it will change the Terms & Conditions relating to Balancing Service Providers. The modification will need to follow the process set out in Article 18 of the Electricity Balancing Guideline (EBR – EU Regulation 2017/2195) – the main aspect of this is that the modification will need to be consulted on for 1 month in the Code Administrator Consultation phase. N.B. This will also satisfy the requirements of the NCER process.