

CUSC Alternative Form – Non Charging

CMP434 Alternative Request 8

Overview: Inclusion of wording within the proposal and subsequent CUSC legal text requiring DNOs to include all applicable Embedded Projects that provide a competent Gate 2 compliance application / submission of evidence within the Gate 2 application window as part of the DNOs fully completed Gate 2 application to the ESO. This would have to be within the codified period of time (currently 10 business days as per the “Rebaseline Proposal”) following closure of the given window.

Proposer: Helen Stack - CBS Energy Storage Assets UK Limited

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

What is the proposed alternative solution?

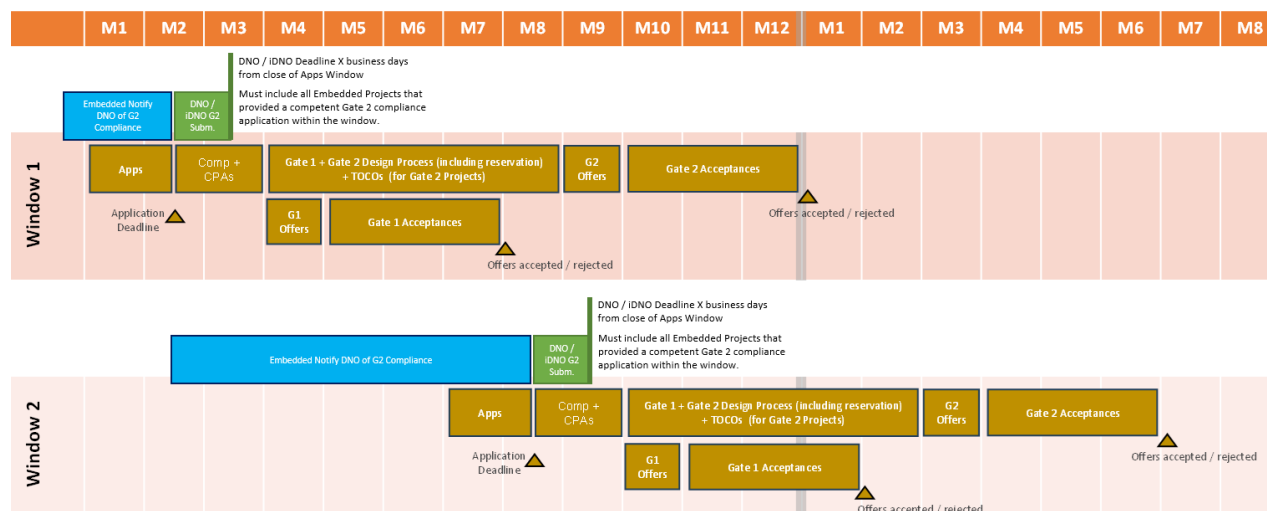
While the “Rebaseline Proposal” introduces a limit on the time a DNO or iDNO can take to submit a completed Gate 2 application to the ESO following the closure of a Gate 2 window, the wording is open to interpretation and does not ensure that all projects that have met the Gate 2 criteria and provided the DNO all necessary information within the Gate 2 window will be included within the DNO or iDNO information exchange with the ESO.

Proposed change to Element 12 and Element 18 within the “Rebaseline Proposal”. **The change would be the inclusion of wording within the proposal and subsequent CUSC legal text requiring DNOs to include all applicable Embedded Projects that provide a competent Gate 2 compliance application / submission of evidence within the Gate 2 application window as part of the DNOs fully completed Gate 2 application to the ESO.** This would have to be within the codified period of time (10 business days as per the “Rebaseline Proposal”) following closure of the given window.

This is necessary to ensure that delays associated with DNO internal processes do not lead to embedded customers "missing" a Gate 2 window. It is noted that currently many DNOs have taken over 12 months to submit project progressions due, in part, to the lack of any guaranteed standard timeframe.

Given the consequential risk to fair and equitable treatment of embedded users from not including such a requirement on the DNOs and the undefined timeline for incorporating within the License, this Alternative seeks to include within the CUSC.

Note, this Alternative no longer seeks to set a specific timeframe for a DNO submission following closure of the Gate 2 application window. The “Rebaseline Proposal” has introduced a 10 business days requirement with a separate Alternative considering the merits of extending this to better facilitate the DNO processes.



What is the difference between this and the Original Proposal?

For members with embedded projects, there are potentially hugely damaging unintended consequences of the Element 18 opening statement: "The process for how DNOs and transmission connected iDNOs notify the ESO of Relevant Embedded Small/Medium Power Stations which meet the Gate 2 criteria is largely based around BAU as it is today."

Element 12 within the “Rebaseline Proposal” introduces a requirement on DNOs and iDNOs to submit their fully completed Gate 2 application including Data Registration Code (DRC) / technical data within 10 business days of the Gate 2 window closing. Yet, this does not directly link back to the embedded project, thus **there is presently no obligation on the DNO to incorporate all projects that have signaled Gate 2 compliance ahead of Gate 2 application window closure.**

Without altering the 10 business days requirement (through this Alternative) the change proposed is the inclusion of wording within the proposal and subsequent legal text requiring DNOs to include all applicable Embedded Projects that provide a competent Gate 2 compliance application / submission of evidence within the Gate 2 application window as part of the DNOs fully completed Gate 2 application to the ESO. This would have to be within the codified period of time (currently 10 business days as per the “Rebaseline Proposal”) following closure of the given window.

Outside of CMP434, it is recommended that the ENA consider a defined competency check process for Gate 2 compliance application / submission of evidence during the 20 business days leading up to the Gate 2 application window closure (transmission). This could minimise the risk of projects not being included within the subsequent DNO application to the ESO due to their submission being classed as non-competent and given insufficient time to rectify.

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 The alternative sets a minimum standard for DNOs which should allow the ESO and TOs to better discharge their obligations.
(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 Facilitates a more equitable connections market for Transmission and Distribution Users.
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and	Neutral No foreseen impact.
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	Positive The alternative promotes efficiency.
*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:

Q2 2025 – At the time of CMP434 implementation.

Implementation approach:

Noted DNOs with support from the ENA may have to consider process changes and the development of guidance to ensure all DNOs and their Licence Areas have a robust approach in place CMP434 implementation.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
DNO	Distribution Network Operator
ENA	Electricity Network Association
ESO	Electricity System Operator
iDNO	Independent Distribution Network Operators
TOCO	Transmission Owner Construction Offer

Reference material: Proposed Gate 2 Process

