

**CUSC Alternative Form – Non Charging****CMP434 Alternative Request 20**

**Overview:** Planning submission or permission is required as part of Gate 2 criteria

**Proposer:** Philip John, Epsilon Generation 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?**

Planning consent or submission to be part of a gate 2 criteria.

**What is the difference between this and the Original Proposal?**

The grid queue is heavily oversubscribed. Grid queue position is being determined by the date of application and having the appropriate land rights.

Currently, speculative projects without planning consents are being focused on ahead of consented projects due to application dates rather than project progression.

We believe that this should be determined by planning consent or at minimum submission. The rationale for this is that:

1. Land Rights & Permissions are typically required before planning consents can be submitted.
2. Red line boundaries are determined by projects that have planning permission. Until this point, it is not possible to accurately predict the exact shape, location and size of a development. Red line boundaries hamper development, and slow down the access to the project network.
3. Priority is given to readily available projects that can be shovel ready quicker and follows the principle of “first ready, first connected”.

If such a principle is applied to the historic connection queue in CMP435, it would result in the most efficient projects being brought forward, and the focus would be elevating projects up the connection queue that are ready to built, rather than attempting to remove connection offers.

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

As per original but additionally:-

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;	<b>Positive</b> It will ensure that attention is focused on projects that are ready to be built, as opposed to projects that have earlier application dates.
(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>Positive</b> It will ensure that generators are focused on projects that can be

	built, as opposed to projects that have earlier application dates.
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and	<b>Neutral</b>
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	<b>Positive</b> It will ensure that attention is focused on projects that are ready to be built.
*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:**

As per Original proposal

**Implementation approach:**

As per Original proposal