

Public

CUSC Alternative Form – Non Charging

CMP446 Alternative Request 4:

Export Capacity' instead of 'Registered Capacity' and change the TIA threshold to 10MW at voltages 11kV and below

Overview: As per the Original, but using 'Export Capacity' rather than the 'Registered Capacity' in relation to measuring the MW threshold .and raising the threshold to 10MW at voltages 11kV and below

Proposer: Helen Stack, Centrica, using 'CBS Energy Storage Assets UK Limited'

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

Public

What is the proposed alternative solution?

Combines Alternative Request 1 with Alternative Request 2. This Alternative proposes:

- 1) using 'Export Capacity' rather than 'Registered Capacity' with respect to the MW threshold measurements, and
- 2) setting a higher threshold of 10MW for generation connecting to the 11kV network and below – where projects have the least impact on the Transmission Network.

What is the difference between this and the Original Proposal?

This Alternative proposes a higher threshold of 10MW on the 11kV to 6.6kV High Voltage (HV) networks, which typically connect into homes and businesses.

For the 132kV to 33kV Extra High Voltage (EHV) networks the new threshold would be 5MW, as per the Original proposal.

This Alternative would also use 'Export Capacity' rather than 'Registered Capacity' with respect to both the two threshold measurements that would result from this Alternative: 5MW at 33kV and above and 10MW 11kV and below.

Suggested first draft of the legal text which require Workgroup discussion:

(f) In England and Wales, it is acknowledged that (unless notified otherwise by The Company and on basis this should be the exception rather than the norm) only an Embedded Small Power Station which **[has an Export Capacity of]****[is]** 5MW or above **if its Point of Connection is at a voltage of more than 11kV or 10MW or above if its Point of Connection at a voltage of not more than 11kV** is a Relevant Embedded Small Power Station requiring the submission of an Evaluation of Transmission Impact to The Company in accordance with Paragraph 5.1(a) above."

CUSC Section 11: "**Maximum Export Capacity** - The maximum continuous **Apparent Power** expressed in MVA and maximum continuous **Active Power** expressed in MW which can flow from **a power station - Offshore Transmission System** connected to a **Network Operator's User System**, **which is connected to the NETS to that User System**."

What is the impact of this change?

Same impacts as the Original proposal

Proposer's assessment against CUSC Non-Charging Objectives

Relevant Objective	Identified impact
--------------------	-------------------

Public

<p>(a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence*;</p>	<p>Positive</p> <p>As per the Original, but</p> <ul style="list-style-type: none"> • The higher threshold at 11kV and below removes additional projects that do not significantly impact the Transmission/Distribution interface further helping efficient discharge of network licence obligations (NESO, NGET and DNOs). • The use of 'Export Capacity' creates a linkage to usage of the NESTS, which is a more efficient approach to the discharging (than the Original, or the Baseline.)
<p>(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;</p>	<p>Positive</p> <p>As per the Original, but</p> <ul style="list-style-type: none"> • The higher threshold at 11kV and below delivers additional benefits for supply competition as large consumers are able to benefit from greater on-site generation. • The use of 'Export Capacity' creates a linkage to usage of the NESTS, which is a more efficient approach to the discharging (than the Original, or the Baseline.)
<p>(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency **; and</p>	<p>Positive</p> <p>Removes disincentives for self-generation.</p>

<p>(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.</p>	<p>Positive</p> <p>As per the Original, but</p> <ul style="list-style-type: none"> • The higher threshold at 11kV and below goes further in removing obligations on HV-connecting DG that are disproportionate to their impact on the Transmission System • The use of 'Export Capacity' creates a linkage to usage of the NETS that is more a more efficient approach to implementation and administration (than the Original, or the Baseline).
--	---

* See Electricity System Operator Licence

**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 the Original Proposal.

Implementation approach:

As per the Original Proposal.

Acronyms, key terms and reference material

Acronym / key term	Meaning
EHV	Extra High Voltage
HV	High Voltage
kV	kilovolt

Reference material: