

**CUSC Alternative Form – Non Charging**

**CMP446 WACM5: Obligation on NESO to publish a list of each GSP and actively state the TIA threshold to be used as agreed between the NESO, DNO and TO – using Export Capacity for measuring the threshold**

**Overview:** This alternative seeks to revise the WACM1 proposal by improving the transparency of the TIA thresholds used by the connection process as well as future proofing the process to allow future revisions to the TIA thresholds (if required). This will be done by placing an obligation on NESO to publish a list of each GSP and actively state the TIA threshold to be used as agreed between the NESO, DNO and TO.

**Proposer:** Grahame Neale, Lightsource bp

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?

We propose to retain the vast majority of the WACM1 proposal, however we would look to revise how the TIA thresholds are published (not how they are determined) to improve the transparency of the thresholds and ease future revisions.

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

Rather than 'hard coding' a MW value into the CUSC as currently proposed, this request would seek to codify an obligation in the CUSC for NESO to publish a document which lists the TIA threshold in effect for each Grid Supply Point (GSP). This could be a complete list of GSPs or a listing of GSPs by exception where they deviate from the national norm. An example is shown below for illustrative purposes.

Grid Supply Point	DNO	TIA Threshold (MW)	Applicable from
<b>Example A</b>	E&W Power Company	5	[Date]
<b>Example B</b>	E&W Electricity Networks	1	[Date]
<b>Example C</b>	Scottish Networks	0.2	[Date]

The precise table of data to be published is to be discussed by the workgroup but the intention is for this publication to be low effort on NESO and network companies whilst focused on publicising the TIA thresholds – future CUSC proposals may wish to enhance this dataset if implemented.

We are also open to workgroup discussions on how this document would be governed and updated, 2 options we have identified are (i) as a schedule to the CUSC or (ii) in a similar manner to the methodology documents produced as part of connections reform.

The key factor is that these documents would need to be regularly updated with the TIA threshold values agreed between NESO, TO and DNO with any updates clearly published ahead of being implemented.

Whilst this obligation (to publish the TIA thresholds) could sit with the Distribution Networks, especially given they largely control the customer connections experience for small and medium embedded generators, we believe NESO would be better suited for this obligation as.

1. The NESO are the CUSC party responsible for interacting with the transmission owners and gatekeeping the TIA process. As the TIA threshold value determines which projects will impact on the Transmission system, it seems sensible that the party responsible for gatekeeping the process and managing the impact on the transmission system should be responsible for publishing what the TIA thresholds are.
2. It provides a single source of the data rather than dispersing the information across all licensed distribution networks.
3. Provides certainty to DNOs of what is expected of them when submitting projects for TIA.

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WACM2 already implements the above for the Original solution based on Registered Capacity, this alternative solution aims to reflect the enhanced reporting requirements on to

WACM1 which is based around Export Capacity. As per the WACM1 solution, the default TIA threshold will be set at 5MW unless otherwise stated in the published list.

## 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 by this licence*;	Positive Same as the WACM1
(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 Same as the WACM1 but with the additional benefit of being more transparent on the TIA threshold in effect at a local level.
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency **; and	Neutral Same as the WACM1
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	Positive Same as the WACM1 but the with additional benefit of being easier to revise the TIA threshold in future if needed.

\* 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.

Public

## When will this change take place?

### Implementation date:

As per the WACM1 proposal.

### Implementation approach:

As per the WACM1 proposal.

## Acronyms, key terms and reference material

Acronym / key term	Meaning
CMP	CUSC Modification Proposal
CUSC	Connection and Use of System Code
DNO	Distribution Network Operator
GSP	Grid Supply Point
MW	Megawatt
NESO	National Electricity System Operator
TIA	Transmission Impact Assessment
TO	Transmission Owner
WACM	Workgroup Alternative CUSC Modification