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Code Administrator Meeting

Summary

Workgroup Meeting 7: CMP456: Cost Recovery for legacy plant in relation to GCO168

Date: 08 July 2026

Contact Details

Chair: Sarah Williams, Sarah.Williams@neso.energy

Proposer: Tim Ellingham, tim.ellingham@rwe.com

Key areas of discussion

The Workgroup reviewed the Original and WACMI legal text, focusing on the claims process, the role of DNOs in submitting claims on behalf of embedded Generators, and the recovery of eligible costs. The Workgroup also considered the need for supporting guidance and reviewed progress towards completing the Workgroup Report and preparing for the final Workgroup vote

Action Log Review

Action 18 (Closed)

The Workgroup discussed the update to the legal text relating to pre-claim and final claim submissions. The Proposer confirmed changes had been made, and the Workgroup verified the amendments in the meeting.

Action 19 (Ongoing)

The Workgroup noted that the action to include an explanation of the proposed guidance note in the Workgroup Report had not yet been completed. The Proposer advised that further work was required on the guidance document before the report section could be finalised, so the action remains open.

Action 20 (Closed)

The Workgroup confirmed that the draft Workgroup Report had been shared on the Collab Space for member review. As the report had been circulated and comments had already been received, the Workgroup agreed that the action had been completed and closed.

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Review and update of CMP456 Original Legal Text

The Workgroup reviewed the latest updates to the CMP456 legal text, focusing on the claims process and the proposed introduction of a mandatory pre-claim stage.

The Workgroup discussed amendments to clarify the ability of DNOs to submit claims on behalf of embedded generators and considered how duplicate claims could be prevented.

The Workgroup reviewed some drafting changes relating to claim eligibility, evidence requirements and the interaction between DNOs, generators and NESO before progressing the legal text to NESO Legal for further review.

Review and update of CMP456 WACM1 Legal Text

The Workgroup reviewed the latest WACM1 legal text amendments, focusing on the recovery of costs associated with producing EMT models and other supporting activities.

The Workgroup discussed the proposed inclusion of “directly attributable costs” and considered whether further clarification was required. Members agreed that the drafting adequately reflected the intent of the proposal and were content to retain the wording.

The Workgroup also agreed that relevant amendments made to the Original Proposal should be mirrored within the WACM1 legal text to ensure consistency across both solutions.

Guidance Note Discussion

The Workgroup discussed the proposed CMP456 guidance note and whether it should be available to Workgroup members before the Workgroup vote. Members noted that the guidance is referenced within the legal text and considered the implications of progressing the modification before the guidance is complete.

The Workgroup also discussed the need for appropriate review of the guidance note before it is issued. It was agreed that a draft guidance note would be developed to support the next stage of the modification.

Workgroup Report Discussion

The Workgroup reviewed the latest draft of the Workgroup Report, including updates made following the Workgroup Consultation and subsequent discussions. The Workgroup were asked to review the report and provide comments, particularly on the consultation summary, legal text discussions and Terms of Reference sections. The Workgroup noted that some sections still

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required further drafting and review before the report could be finalised. It was agreed that the report would be updated ahead of the next meeting and used to support the final Workgroup vote.

Terms of Reference Discussion

The Workgroup reviewed each of the CMP456 Terms of Reference to confirm that they had been adequately considered through the Workgroup discussions. Noting how these should be reflected within the Workgroup Report and agreed that further drafting would be undertaken to capture the Workgroup's conclusions. The Chair recommended all Workgroup members reviewed the proposed wording to ensure the discussion and outcomes had been accurately recorded.

Next Steps

The Chair advised the draft legal text, and guidance note will be circulated before the next meeting for review.

The Chair encouraged workgroup members to review the Workgroup Report on the collaboration space.

Actions

For the full action log, click [here](#).

Action Number	Workgroup Raised	Owner	Action	Due by	Status
18	WG6	TE	Review and update the wording in the legal text around pre-claim and final claim submissions, including timelines and requirements.	WG7	Closed
19	WG6	TE	Add an explanation in the Workgroup report document outlining what the guidance note will entail if the full guidance note cannot be completed before submission.	WG7	Open

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20	WG6	SW	Share the Draft Workgroup Report with and request that everyone review and add content, especially regarding terms of reference and post-consultation discussions.	WG7	Closed
21	WG7	PJ	Draft alternative wording for the legal text relating to the embedded customer being within the GC0168 affected class (paragraph 6.40.4(A)), following the discussion on how this should be expressed.	WG8	Open
22	WG7	TE	Review proposed wording and determine how it should be incorporated into the legal text.	WG8	Open
23	WG7	JP	Discuss with NGED legal, whether the DNO provision should use stronger wording (e.g. "shall" / "will" instead of "may") regarding submitting claims on behalf of embedded customers and provide feedback to the group.	WG8	Open
24	WG7	SW	Confirm the governance position on the CMP456 guidance note, specifically whether the guidance must be available to the Workgroup before the vote because it is referenced in the legal text.	WG8	Open
25	WG7	TE	Share first draft of the CMP456 guidance note.	WG8	Open
26	WG7	AH	Update the legal text so that the additional wording regarding:	WG8	Open

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			"directly attributable costs necessarily incurred in obtaining and transferring data"		
27	WG7	JP	Share information on the number of Generators likely to be in scope.	WG8	Open

Attendees

Name	Initial	Company	Role
Sarah Williams	SW	NESO	Chair
Prisca Evans	PE	NESO	Technical Secretary
Tim Ellingham	TE	RWE	Proposer
Aishwarya Harsure	AH	Neso	NESO Representative
Andrew Colley	AC	SSE Generation	Workgroup alternate
Ghulam Haider	GH	Ofgem	Authority Representative
Gopi Yericherla	GY	NESO	NESO SME
Isaac Gutierrez	IG	SPR	Workgroup member
Jack Purchase	JP	NGED	Workgroup member
Paul Jones	PJ	Uniper	Workgroup alternate
Ross Strachan	RS	EDF-PS	Workgroup member
Utkarsh Agarwal	UA	ESB Generation and Trading Limited	Workgroup member