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| **CUSC Alternative Form** |
| **CMP328 Alternative Request 2:**  Connections Triggering Distribution Impact Assessment |
| **Overview:** As per the Original, except to apply to all new connecting assets including, but not limited to, those from IDNOs, DNOs, TOs, OFTOs and Interconnectors (as well as Generation and Demand, which are part of the Original proposal). |
| **Proposer:** Garth Graham, SSE Generation |
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| **Guidance for Alternative Proposers** |
| **Who can raise an Alternative?** Any CUSC or BSC Party, or Citizens Advice can raise an Alternative Request in response to the Workgroup Consultation.  **How do Alternative Requests become formal Workgroup Alternative Modifications?** The Workgroup will carry out a Vote on Alternatives Requests. If the majority of the Workgroup members or the Workgroup Chair believe the Alternative Request will better facilitate the Applicable Objectives than the current version of the Code, the Workgroup will develop it as a Workgroup Alternative Modification.  **Who develops the legal text for Alternatives?** ESO will develop the Legal text for all Workgroup Alternative Modifications and will liaise with the Alternative Proposer to do so. |

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What is the proposed alternative solution?

As per the Original, except to apply the proposed solution to all new connecting assets including, but not limited to, those owned (and possibly operated) by IDNOs, DNOs, TOs, OFTOs and Interconnectors (as well as those for Generation and Demand, which are part of the Original proposal).

Currently, as per the Original solution, if a Generator or a Demand customer wishes to connect, say, a new 1.5MW asset at a particular node on the system then a Distribution Impact Assessment (DIA) will be required.

However, if at that very same node an IDNO or a DNO or a TO or an OFTO or an interconnector wished to also connect a new 1.5MW asset then; according to the Original proposal; no (CMP328 Original) DIA would need to be undertaken with respect to the TO, ESO or any neighbouring DNO(s) or; in the case of the IDNO or TO or OFTO or interconnector; the host DNO.

This alternative would apply the CMP328 Original solution requirements pari passu[[1]](#footnote-2) to new connections relating to an IDNO or a DNO or a TO or an OFTO or an interconnector asset.

This proposed alternative seeks to address a concern about undue discrimination and thus ensure both a level playing field and that cost reflective charging is applied.

It is based on a technologically agnostic approach which treats all newly connecting assets in the same way.

This, in simple terms, treats the effect, electrically, of connecting a new 1.5MW asset at a node on a particular interrelated distribution network (such as the effect on a neighbouring network owned by one or more DNOs or the host TO) as being the same - irrespective of who owns the newly connecting asset as that asset, by either importing or exporting (or both) via that node should, in principle, have the same or similar network effect, electrically, which the DIA should identify and, if necessary, address.

What is the difference between this and the Original Proposal?

It applies the Original solution to new connections for IDNOs, DNOs, TOs, OFTOs and interconnectors (as well as to new connections for Generation and Demand).

What is the impact of this change?

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| **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**  As per the Original plus ensures that the Licensee discharges the obligations in respect of both acting in a none discriminatory manner and applying cost reflective charging. |
| (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**  As per the Original plus ensures that competition between newly connected assets; such as those associated with an IDNO or DNO or TO or OFTO or interconnector; are treated in the same way as all other newly connecting assets. |
| (c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*; and | **Positive**  Ensures that the obligations placed upon the TSOs and DSOs within the Third Package and Clean Energy Package (as transposed into retained UK law) in respect of acting in a none discriminatory manner and applying cost reflective charges is complied with. |
| (d) Promoting efficiency in the implementation and administration of the CUSC arrangements. | **Positive**  As per the Original. |
| \*Objective (c) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER). | |

When will this change take place?

**Implementation date:**

As per the Original.

**Implementation approach:**

As per the Original.

Acronyms, key terms and reference material

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| **Acronym / key term** | **Meaning** |
| IDNO | Independent Distribution Network Operator[[2]](#footnote-3) |
| OFTO | Offshore Transmission Owner[[3]](#footnote-4) |

**Reference material:**

1. None

1. A Latin phrase used in legal documentation to mean on an equal footing or side by side. [↑](#footnote-ref-2)
2. <https://www.ofgem.gov.uk/electricity/distribution-networks/connections-and-competition/independent-distribution-network-operators> [↑](#footnote-ref-3)
3. <https://www.ofgem.gov.uk/electricity/transmission-networks/offshore-transmission> [↑](#footnote-ref-4)