

**CUSC Alternative Form – Non Charging**

# CMP435 Alternative Request 11:

**Overview:** To change the proposal in Element 12 for the time that DNOs and IDNOs have to submit the evidence to demonstrate that projects connecting to their networks have met the Gate 2 criteria (and also the full technical data submission required for a project progression), from 10 working days to 20 working days

**Proposer:** Jack Purchase, National Grid Electricity Distribution

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

## What is the proposed alternative solution?

The Original solution does not allow enough time for Distribution Network Operators (DNOs) and Independent Distribution Network Operators (IDNOs) to collate all of the information required for each customer that has passed Gate 2 in 10 working days following the closure of the Gate 2 window. NGED has 56 Grid Supply Points (GSPs) in their network and therefore 1000s of pieces of evidence (Gate 2 criteria and all of the technical information associated with submitting a project progression), which would be required to be submitted. The current timeframe could result in DNOs/IDNOs being unable to provide the correct information, providing inaccurate information, or not being able to provide information across all of the GSPs. This will significantly impact DNO/IDNO customer connections if the deadline is missed. If the timescales stay as they are in the current proposal, there is a risk that the Gate 2 window would need to close earlier for Distribution Connected customers to allow enough time for the relevant information to be submitted. This would therefore negatively impact Distribution Connected customers (please note that this is not something we want to happen and hence the reasoning behind raising this WACM).

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

Within Element 12 of the Original proposal, the timescale for DNOs and IDNOs is to submit their fully completed Gate 2 application, with technical data, 10 working days from the closure of the Gate 2 window, this includes Data Registration Code (DRC). This proposal is to increase the timescale for the process to 20 working days to allow DNOs and IDNOs enough time to be able to provide this information. We note that 10 working days is insufficient to provide detailed and accurate information for multiple GSPs.

## 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 the Transmission Licence;	<b>Positive</b> Ensures DNOs and IDNOs can meet the code timeframes
(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> Ensures that all customers have a fair opportunity to demonstrate that Gate 2 has been met
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and	<b>Positive</b>

	Ensures DNOs and IDNOs can meet the code timeframes
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	<b>Positive:</b> Ensures DNOs and IDNOs are able to submit the information required in relation to customers meeting the Gate 2 criteria in a timely manor
*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:

This solution can be implementation at the same time as the overall Connections Reform implementation date.

#### Implementation approach:

The implementation approach would be the same as the overall Connections Reform implementation with a change in timescales for Element 12.

### Acronyms, key terms and reference material

Acronym / key term	Meaning
DNOs	Distribution Network Operators
IDNOs	Independent Distribution Network Operators
GSP	Grid Supply Point
DRC	Data Registration Code
WACM	Workgroup Alternate Code Modification