

Public

Code Administrator Meeting

Summary

Workgroup Meeting 9: CMP447 'Removal of designated strategic works from cancellation charges/securitisation'

Date: 01 September 2025

Contact Details

Chair: Kat Higby, katharine.higby@neso.energy

Proposer: Harvey Takhar, Harvey.Takhar@neso.energy

Key areas of discussion

The Chair noted that the purpose of the meeting was to consider and then vote on Alternative Request 2.

CMP447 Alternative Request 2: Defined Obligations

The Proposer of Alternative Request 2 presented it to the Workgroup, explaining its intent to add obligations and timeframes for designated submissions without altering the original legal text.

Benefits noted:

- **Implementation Certainty:** Adds clear timeframes for submissions, reducing uncertainty about when actions will occur.
- **Transparency:** Requiring publication of an accepted works register, improves visibility for all market participants.
- **Administrative Efficiency:** Aims to align processes with security periods, minimizing the risk of mid-period updates and double handling.
- **Fallback Option:** Provides a practical interim solution if a full methodology cannot be agreed, ensuring some progress over the original Proposal.
- **Flexibility:** Allows for further refinement and combination with other Proposals, supporting ongoing development.
- **Industry Certainty:** Sets expectations for process and timelines, giving the wider industry more predictability.

Concerns noted:

- **Submission Timing:** Concern that proposed dates may not align with securities runs, risking double handling; suggestion to adjust dates.

Public

- **Legal Enforceability:** Non-reversible designation obligations cannot be imposed on Ofgem.
- **Project Coverage:** Concern raised that some island links may not be clearly included due to ambiguous methodology; need for explicit criteria.
- **Legal Certainty:** Caution about relying on obligations outside the CUSC legal text; preference for clear, enforceable responsibilities.
- **Text Clarity:** Request to clarify "otherwise so designated" to avoid confusion about accepted works.
- **Enduring Solution:** Risk that long-term designation criteria remains unclear without a defined methodology.

Alternative Vote

The Workgroup agreed to vote on the Alternative, unanimously supporting its further development as a WACM (WACM2).

Of the 17 votes on whether the Alternative Proposal better facilitates the CUSC non-charging objectives than the original:

- 17 Workgroup members voted yes
- 0 Workgroup members voted no
- 0 Workgroup member abstained

Next Steps

The Chair noted the next Workgroup meeting 10 on 02 September.

Actions

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

Action Number	Workgroup Raised	Owner	Action	Due by	Status
27	WG8	PM/HT	Further refine the language within the CUSC Section 15 Guidance Note based on Workgroup feedback.	WG10	Open

Public

28	WG8	PM/HT	Ask internally about the possibility of adjusting the Strategic Investment Factor (SIF) as a workaround if Ofgem's designation is delayed.	WG10	Open
----	-----	-------	--	------	------

Attendees

Name	Initial	Company	Role
Kat Higby	KH	NESO, Code Administrator	Chair
Andrew Hemus	AH	NESO, Code Administrator	Tech sec
Harvey Takhar	HT	NESO	Proposer
Paul Mott	PM	NESO	Proposer Alternate
Alex Curtis	AC	NESO	SME
Als Scrope	AS	Northland Power	Workgroup Member
Anthony Diccico	AD	ESB Generation and Trading	Workgroup Alternate
Barney Cowin	BC	Blue Float	Workgroup Member
Calum MacDonald	CM	Point and Sandwich Trust	Workgroup Member
Charles Yates	CY	Muir Mhor Offshore Wind Farm Ltd (50% owned by Vattenfall)	Workgroup Member
Chris White	CW	Research Relay Ltd	Workgroup Alternate
Christopher Patrick	CP	Ofgem	Authority Representative
Ciaran Fitzgerald	CF	Scottish Power Renewables	Workgroup Member
Damian Clough	DC	SSE	Workgroup Member
E Lian Diong	ELD	Bowdun Offshore Wind Farm	Workgroup Alternate

Public

Glenn Smith	GS	EDF Energy Renewables	Workgroup Member
Holly Thomas	HT	Scottish Renewables	Workgroup Member
Kyle Murchie	KM	Roadnight Taylor	Workgroup Member
Patrick Smart	PS	RES Group	Workgroup Member
Paul Smillie	PS	SPEN	Observer
Paul Youngman	PY	Drax	Workgroup Member
Richard Blanchfield	RB	Talisk-Magnora Offshore Wind Ltd (Grid Advisor)	Workgroup Member
Tim Ellingham	TE	RWE	Workgroup Member