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CUSC Alternative and Workgroup Vote

CMP447: Removal of designated strategic works from cancellation charges/securitisation

Please note: To participate in any votes, Workgroup members need to have attended at least 50% of meetings.

Stage 1 – Alternative Vote

If Workgroup Alternative Requests have been made, vote on whether they should become Workgroup Alternative Connection and Use of System Code (CUSC) Modifications (WACMs).

Stage 2 – Workgroup Vote

2a) Assess the original and WACMs (if there are any) against the CUSC objectives compared to the baseline (the current CUSC).

2b) Vote on which of the options is best.

Terms used in this document

Term	Meaning
Baseline	The current CUSC (if voting for the Baseline, you believe no modification should be made)
Original	The solution which was firstly proposed by the Proposer of the modification
WACM	Workgroup Alternative CUSC Modification (an Alternative Solution which has been developed by the Workgroup)

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For reference the Applicable CUSC (non-charging) Objectives are:

- i. *The efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence*;*
- ii. *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;*
- iii. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency **; and*
- iv. *Promoting efficiency in the implementation and administration of the CUSC arrangements.*

** See Electricity System Operator Licence*

***The Electricity Regulation referred to in objective (iii) 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.*

Workgroup Vote

Stage 1 – Alternative Vote

Vote on Workgroup Alternative Requests to become Workgroup Alternative CUSC Modifications.

The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.

Should the majority of the Workgroup OR the Chair believe that the potential alternative solution may better facilitate the CUSC objectives than the Original proposal then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative CUSC modification (WACM) and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.

"Y" = Yes

"N" = No

"-" = Neutral (Stage 2 only)

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"Abstain"

Workgroup Member	Alternative 1 (Nadara Bluefloat Energy Partnership, Strategic Alignment with CSNP)	Alternative 2 (Kyle Murchie Roadnight Taylor, Defined Obligations)	Alternative 3 (Kyle Murchie Roadnight Taylor, WACM1 and WACM2 Combination)
Alan Kelly (WACM1 vote), Marc Smeed (WACM3 vote)	Y	-	Y
Als Scrope (WACM1 and WACM2 votes), John Gaffney (WACM3 vote)	Y	Y	Y
Barney Cowin (WACM1, WACM2 and WACM3 votes)	Y	Y	Y
Calum Duff (WACM1 and WACM3 votes), E Lian Diong (WACM2 vote)	Y	Y	Y
Charles Yates (WACM1, WACM2 and WACM3 vote)	N	Y	N
Ciaran Fitzgerald (WACM1, WACM2 and WACM3 votes)	Y	Y	Y
Damian Clough (WACM1, WACM2 and WACM3 votes)	Y	Y	Y
Chris White (WACM1 and WACM2 votes), Dennis Gowland (WACM3 vote)	Y	Y	Y

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Glenn Smith (WACM1, WACM2 and WACM3 votes)	Y	Y	Y
Paul Mott (WACM1, WACM2 and WACM3 votes)	N	Y	N
Holly Thomas (WACM1, WACM2 and WACM3 votes)	Y	Y	Y
Kirsty Dawson (WACM1 vote), Andrew Yates (WACM2 and WACM3 votes)	Y	Y	Y
Catherine Cleary (WACM1 vote), Kyle Murchie (WACM2 vote)	Y	Y	-
Anthony Diccio (WACM1, WACM2 and WACM3 votes)	Y	Y	Y
Mark Scott (WACM1 vote)	Abstain	-	-
Neil Bennett (WACM1 vote)	N	-	-
Patrick Smart (WACM2 and WACM3 votes)	-	Y	Y
Paul Youngman (WACM1, WACM2 and WACM3 votes)	Y	Y	Y
Richard Blanchfield (WACM1 and WACM2 votes),	Y	Y	Y

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Adanna Ugo-Okoye (WACM3 vote)			
Claire Hynes (WACM1 vote), Tim Ellingham (WACM2 and WACM3 votes)	Y	Y	Y
WACM?	WACM1	WACM2	WACM3
Date of Vote	28 August 2025 (Workgroup 8)	01 September 2025 (Workgroup 9)	05 September 2025 (Workgroup 11)

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Stage 2a – Assessment against objectives

To assess the original and WACMs against the CUSC objectives compared to the baseline (the current CUSC).

You will also be asked to provide a statement to be added to the Workgroup Report alongside your vote to assist the reader in understanding the rationale for your vote.

ACO = Applicable CUSC Objective

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Adanna Ugo-Okoye - Magnora Offshore Wind Ltd (Grid Advisor)				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y
Voting Statement: <p>We are in support of the Original and all WACMs as they extend the current CUSC provisions beyond HND to cover designated strategic works such as ASTI ,LOTI, or further schemes that may be strategic investments, which are system-led rather than project-driven. Generators should not face cancellation liabilities for infrastructure planned on this basis; treating these as excepted works removes inappropriate risk from generators and supports efficient investment decisions.</p> <p>We believe WACM3 to be the preferred option, as it places clearer obligations on NESO, improving transparency and consistency for developers, which in turn facilitates competition under CUSC objective (ii).</p>					

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Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Als Scrope – Northland Power				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y
Voting Statement: Northland Power supports the aims of this modification and would support either the original or any WACM as a big improvement upon the status quo and facilitating the objectives (arguably all of i, ii and iv, though primarily ii). We support WACM 3 as the best option for giving the clearest process for the benefit of all participants, and offers the greatest certainty to developers of projects which is particularly needed due to queue management and other reforms. Furthermore we strongly support the urgency of this modification and urge swift implementation reflecting the new Gate 2 process.					

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Barney Cowin – Blue Float				
Original	-	Y	-	-	-
WACM 1	Y	Y	-	Y	Y
WACM 2	Y	Y	-	Y	Y
WACM 3	Y	Y	-	Y	Y

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Voting Statement:

Both the Original and all alternatives would better facilitate competition as they would remove barriers to entry by providing a clearer, more predictable exclusion framework for strategic works, with enhanced transparency through CSNP consultation processes. We are also of the view that the three alternatives better facilitate the efficient discharge of the Licensee's obligations as they would create more streamlined approach to strategic work designation, and they would also better facilitate efficiency in the implementation and administration of CUSC arrangements by eliminating administrative duplication. We are of the view that the three alternatives are better overall than the baseline. Whilst we see some advantages of the Original in marginally improving the legal text, we are of the view that material uncertainties remain regarding the process of designation and scope of excepted works such that it does not sufficiently address the defect to represent a notable improvement on the baseline. We support the intentions of all alternatives and are of the view that whilst they all are improvements, alternative 3 delivers materially more benefits as it address both the short-term process and also enduring alignment with strategic network planning.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Calum Duff – Bowdun Offshore Wind Farm				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	Y	Y
WACM 2	-	Y	-	Y	Y
WACM 3	-	Y	-	Y	Y
Voting Statement: We view all forms of the CMP447 proposal to bring the designation of strategic works in line with those captured under CMP428 and making financial commitments against					

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attributable works. In this specific instance TWP views WACM3 as the most suited to ensure that NESO are held to account and appropriate processes are put in place, CMP447 as a concept better facilitates competition by levelling the securities requirements for developing projects on assets that are not a direct result of their connection. Furthermore, removal of such significant assets will enable a quicker and cleaner process for the development of securities statements for all contracts.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Charles Yates – Muir Mhor Offshore Wind Farm Ltd (50% owned by Vattenfall)				
Original	-	Y	-	Y	Y
WACM 1	-	Y	-	Y	Y
WACM 2	-	Y	-	Y	Y
WACM 3	-	Y	-	Y	Y

Voting Statement:

This CMP is strongly supported as it reduces charges for relevant Generators by removing the cost of designated works from the high Attributable Works cancellation charges. This will avoid "double charging" for works already funded through the Transmission price control settlement. This CMP will facilitate competition and the achievement of Net Zero targets by cutting an undue burden on some pre-commissioning Generators and facilitating access and connections. Implementing this CMP before Gate 2 connection offers are made will provide strong support to relevant Generator business cases and boost investment. WACM2 proposes greater transparency and a better-defined process which will further increase investor confidence and boost competition and progress towards Net Zero.

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Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Ciaran Fitzgerald – Scottish Power Renewables				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y
Voting Statement: We believe that the original and each of the WACMs better facilitate competition in the electricity market through the removal of unnecessary securities which could deter viable projects from signing connection agreements. Whilst there could be potential for some benefits with respect to ACOs i) and iv), this is less clear/certain and so we have marked these as neutral. WACM3 combines the benefits of WACM1 and WACM2 and we believe it better facilitates ACO ii) by providing additional clarity and transparency for market participants.					

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Damian Clough – SSE				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y
Voting Statement:					

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All proposals are better than the baseline as Connecting Users currently provide securities against attributable works part of which may be associated with strategic reinforcement works approved by the Authority. Strategic work is build that is not specifically triggered by the connection of the Users therefore should be removed from User Commitment.

What is deemed as Strategic is hard to define as there are various ways/plans etc that a circuit could be deemed as Strategic. Therefore, WACM3 provides potentially the most coverage thus better solving the defect.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Dennis Gowland - Research Relay Ltd				
Original	Y	Y	-	Y	Y
WACM 1	Y	Y	-	Y	Y
WACM 2	Y	Y	-	Y	Y
WACM 3	Y	Y	-	Y	Y

Voting Statement:

CMP447 addresses a deficiency in the CUSC in regard to Attributable Works in that Transmission Infrastructure is now increasingly arising from Strategic Planning rather than as a result of specific Generation projects. The deficiency was addressed for HND works in CMP428 but did not include other designated strategic infrastructure such as ASTI and LOTI works. CMP447 seeks to expand the scope of Excepted Works and we support the Original and all WACMs as better than Baseline, but favour WACM2 as it gives better visibility to users in terms of investment decisions based on the recent Connections Reforms.

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Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Glenn Smith - EDF Energy Renewables				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y
Voting statement not provided.					

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Harvey Takhar - NESO				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y

Voting Statement:

NESO believes that the original formulation is the most elegant and simple to make work, and ultimately to understand, and therefore the best. WACM1 attempts to tie down what works are excluded in relation to CP30 and Beyond 2030, which onshore precede the specific recommendations in the CNSP (first published from end 2027, on the current plan) and relate to for example new circuits out of general areas like "Northeast Scotland". It's the CSNP that translates these into specific circuits, of which Ofgem may then go on to approve the needs case and fund construction. The apparently precise formulations in the paragraphs of WACM1's text do ultimately still

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leave a judgement being made as to whether each transmission scheme is generator-dependent or for wider system benefit. It adds a good deal to perceived complexity without really adding precision, and there is surely a risk that the various documents and processes referred to may at some point change their names – who remembers NOA? And SYS? (I realise that the formulation attempts to ameliorate this risk). Nonetheless, WACM1 (and derived WACM3) are still better than baseline and we do respect the effort put into its drafting.

WACM2 attempts to add transparency by imposing certain obligations on NESO. We prefer the baseline where ultimately Ofgem has discretion to designate, having taken advice from NESO; we do not consider for instance that publication of instances where Ofgem has taken a decision that differed from NESO advice represents an efficient or necessary process. Nonetheless, again, WACM2 as an entire package, including its basic grounding in the original, is better than baseline and we appreciate the effort and thought that went into it.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Holly Thomas – Scottish Renewables				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y
Voting Statement not provided.					

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Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Kirsty Dawson – Statkraft				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	Y	Y
Voting Statement: We are in support of the original and the 3 WACMs, however we believe WACM 3 to be the preferred option due to the increased obligations this places on NESO.					

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Kyle Murchie – Roadnight Taylor				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y
Voting Statement: While all proposals have their merits, WACM 3 is the preferred option, followed by WACM 2. WACM 3 streamlines the designation of Excepted Works and minimises the risk of independent methodologies which would be at odds with the concept of a Centralised Strategic Network Plan, while setting out a minimum set of obligations on NESO.					

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WACM 3 is believed to best facilitate Objective ii. Objective i and iv are better facilitated by WACM 2 and WACM 3 when compared to the Original, but not necessarily the baseline.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Lenka Peskova – ESB Generation and Trading				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y

Voting Statement:

CMP447 expands the impact of previously approved CMP428 as it includes the strategic works that are not part of the Holistic Network Design. These works are designated, and funding is approved regardless of the connecting generators contributing and therefore should not be securitised by the individual projects. Considering the varying degree of certainty provided by the proposals, our preferred option is WACM3 which allows for more accurate planning of the costs associated with future projects.

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Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
Marc Smeed – Corio Generation					
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y
Voting Statement: Objective ii) – the original and all WACMS propose a change that better facilitates competition between Generators by removing the cost distortion faced by pre-commissioning Generators that are due to investment in plan-led, strategic Transmission reinforcement works.					

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
Neil Bennett – SSEN Transmission					
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y
Voting Statement: CMP447 was initiated in order to rectify a defect where securities/liabilities were being passed through to developers for some reinforcements that would be considered “strategic” where they would be built irrespective of Generators for broader system development. CMP428 was implemented but with a narrower scope where it was only					

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beneficial to Offshore schemes whereas this mod incorporates onshore reinforcements. SSEN T believes the Original and WACMs facilitate this extension, however only the original has the potential to encompass any reinforcements that is deemed to be applicable whereas the WACMs could miss out on some of them.

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Patrick Smart – RES UK & Ireland Limited				
Original	Y	Y	-	-	Y
WACM 1	Y	Y	-	-	Y
WACM 2	Y	Y	-	-	Y
WACM 3	Y	Y	-	-	Y

Voting Statement:

Applicable Objective ii): The Original and all WACMs remove a degree of Transmission infrastructure delivery risk that is unjustifiably imposed on new Generator development assets. All options would establish a more equitable sharing of risk between transmission owners and the market. This would improve investor confidence and remove a degree of unnecessary project risk that, under current baseline rules, can be sufficient to stop project development that would otherwise be able to efficiently progress to full operation.

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Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Paul Youngman - Drax				
Original	-	Y	-	-	Y
WACM 1	-	Y	-	-	Y
WACM 2	-	Y	-	-	Y
WACM 3	-	Y	-	-	Y
Voting Statement: All the proposals could have a beneficial impact on competition and are therefore positive in relation to applicable CUSC objective (ii). For the original we feel the benefits could be marginal, as it relies solely on NESO and Ofgem discretion as to whom the designation applies. Of the proposals the preferred option is WACM 3, as this provides the clearest process and offers the greatest certainty to developers of projects.					

Workgroup Member	Better facilitates ACO (i)	Better facilitates ACO (ii)	Better facilitates ACO (iii)	Better facilitates ACO (iv)	Overall (Y/N)
	Tim Ellingham - RWE				
Original	Y	Y	-	-	Y
WACM 1	Y	Y	-	-	Y
WACM 2	Y	Y	-	-	Y
WACM 3	Y	Y	-	-	Y
Voting Statement: This modification will avoid over securitisation of works, thus lowering the financial barrier to undertaking generation projects directly connecting. This will encourage					

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investment into the country, reduce the risk to existing projects, and enable more competition. WACM2 enables a broader scope of works that can be excepted.

Of the 19 votes, the following number of voters said each solution was better than the Baseline:

Option	Number of voters that voted this option as better than the Baseline
Original	18
WACM1	19
WACM2	19
WACM3	19

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Stage 2b – Workgroup Vote

Which option is the best? (Baseline, Proposer solution (Original Proposal), WACM1, WACM2 and WACM3)

Workgroup Member	Company	Industry Sector	BEST Option?	Which objective(s) does the change better facilitate? (if baseline not applicable)
Adanna Ugo-Okoye	Talisk-Magnora Offshore Wind Ltd (Grid Advisor)	Generator	WACM 3	ii
Als Scrope	Northland Power	Generator	WACM 3	ii
Barney Cowin	Blue Float	Generator	WACM 3	i, ii, iv
Calum Duff	Bowdun Offshore Wind Farm	Generator	WACM 3	ii, iv
Charles Yates	Muir Mhor Offshore Wind Farm Ltd (50% owned by Vattenfall)	Offshore Transmission Licensee	Original	ii
Ciaran Fitzgerald	Scottish Power Renewables	Generator	WACM 3	ii
Damian Clough	SSE	Generator	WACM 3	ii
Dennis Gowland	Research Relay Ltd	More than one of the above	WACM 2	i, ii, iv
Glenn Smith	EDF Energy Renewables	Generator	WACM 3	ii

Public

Harvey Takhar	NESO	System Operator	Original	ii
Holly Thomas	Scottish Renewables	Other	WACM 3	ii
Kirsty Dawson	Statkraft	Generator	WACM 3	ii, iv
Kyle Murchie	Roadnight Taylor	Other	WACM 3	ii
Lenka Peskova	ESB Generation and Trading	Generator	WACM 3	ii
Marc Smeed	Corio Generation	Generator	WACM 3	ii
Neil Bennett	SSEN Transmission	Network Operator	Original	ii
Patrick Smart	RES UK & IRELAND LIMITED	Generator	WACM 3	i, ii
Paul Youngman	Drax	Generator	WACM 3	ii
Tim Ellingham	RWE	Generator	WACM 2	i, ii