

Public

Code Administrator Consultation Response Proforma

CM0103: STC Consequential Modification for CMP447 (follow on Modification to CMP428)

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to stcteam@nationalenergyso.com by **5pm on 15 September 2025**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation,
stcteam@nationalenergyso.com

Respondent details	Please enter your details	
Respondent name:	Stephen Baker	
Company name:	NESO	
Email address:	stephen.baker@neso.energy	
Phone number:	07929724347	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input checked="" type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (*this will be shared with industry and the Panel for further consideration*)

☐ **Confidential** (*this will be disclosed to the Authority in full but, unless specified, will not be*

Public

shared with the Panel or the industry for further consideration)

For reference the Applicable STC Objectives are:

- a) efficient discharge of the obligations imposed upon Transmission Licensees by Transmission Licences and the Electricity Act 1989;*
- b) efficient discharge of the obligations imposed upon the licensee by the Electricity System Operator licence, the Energy Act 2023 and Electricity Act 1989;*
- c) development, maintenance, and operation of an efficient, economical, and coordinated system of electricity transmission;*
- d) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity;*
- e) protection of the security and quality of supply and safe operation of the National Electricity Transmission System insofar as it relates to interactions between Transmission Licensees and the licensee*;*
- f) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC;*
- g) facilitation of access to the National Electricity Transmission System for generation not yet connected to the National Electricity Transmission System or Distribution System; and*
- h) compliance with the Electricity Regulation and any Relevant Legally Binding Decisions of the European Commission and/or the Agency.*

** See Electricity System Operator Licence*

Public

Please express your views in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions			
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives against the current baseline?	Mark the Objectives which you believe the proposed solution(s) better facilitates than the current baseline:	
		Original	<input type="checkbox"/> a) <input type="checkbox"/> b) <input type="checkbox"/> c) <input checked="" type="checkbox"/> d) <input type="checkbox"/> e) <input type="checkbox"/> f) <input type="checkbox"/> g) <input type="checkbox"/> h) <input type="checkbox"/> None
		<p>STC Panel is invited to approve this STC change dependent on CMP447 being approved, as it is consequential to the same. STC had been altered previously when CMP428 was passed in the CUSC, to reflect the change in the definition in CUSC of Attributable Works, a part of a pre-commissioning generator’s potential cancellation charge (which has to be secured until the generation project commissions). The definition of attributable works, and the new associated term of excepted works that CMP428 brought in as a result, need reflecting, if CMP447 is approved, from CUSC into the STC.</p> <p>We believe that the Original Proposal better facilitates the Applicable Objectives versus the current baseline by facilitating CMP447 which extends the effect of CMP428 by excluding from pre-commissioning generators’ attributable works, parts that currently fall therein of any transmission schemes designated by the Authority.</p> <p>CMP428, in force in CUSC already, only excludes the HND works that are specified in CMP428’s legal text. Generally speaking, the designated</p>	

Public

		<p>works are likely to be transmission schemes that are strategic in nature and not generator dependent. CMP447 will ensure that relevant Users do not continue to provide unnecessary securities in relation to transmission works that are independent of their connection, removing a barrier to entry for new generation.</p> <p>CMP447 will also adjust the fixed Attributable Works of relevant Generators by removing the relevant element of their fix, while keeping the rest of the fix intact.</p> <p>This adjustment of fixed attributable works is a commercial matter dealt with within CUSC; it is of no consequence to the STC and forms no part of CM0103.</p> <p>The way CM0103 makes the consequential change is simply to point to the CUSC for the definitions of attributable works and of excepted works (also a spelling error of excepted works in baseline STC, where it was spelt “expected” by mistake, is corrected in CM0103).</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>NESO’s connections and finance/banking teams will aim to identify relevant projects and give them the benefit of the modification within a few weeks of designation, subject to resource.</p>

Public

3	Do you have any other comments?	No
---	---------------------------------	----