

Public

Nadir Hafeez  
Ofgem  
**By email**

Anthony Pygram  
Independent Chair CUSC & Grid Code Panel

31 October 2025

CMP462 Urgency Request Letter

Dear Nadir

Connection and Use of System Code (CUSC) Modification Panel Request for Urgency and Recommended Timetable for **CMP462: Provision for Alternate Panel Members**.

On 24 October 2025, NESO raised **CMP462**. The Proposer sent a request to the CUSC Panel Secretary for this modification to be treated as urgent.

**CMP462** seeks to give provision for the Code Administrator to run an expedited Alternate Election Process where the CUSC election process has not resulted in the election of Alternate Panel Members.

All documentation for this modification can be located via the following link:

<https://www.neso.energy/industry-information/codes/cusc/modifications/cmp462-provision-alternate-panel-members>

The CUSC Modifications Panel ("the Panel") on 31 October 2025, considered **CMP462** and the associated request for urgency. This letter sets out the views of the Panel on the request for urgent treatment and the procedure and timetable that the Panel recommends.

The Proposer set out their rationale for Urgency against Ofgem's Urgency criteria (a) which is as follows:

**a) A significant commercial impact on parties, consumers or other stakeholder(s).**

This is due to the risk presented by a possible lack of quoracy at CUSC Panel meetings, which could have a serious impact on the progress of CUSC Modification Proposals, particularly for those where Special Panel meetings are required at short notice.

**Panel Consideration of the Request for Urgency**

The Panel considered the request for urgency with reference to Ofgem Guidance on Code Modification Urgency Criteria. The unanimous view of the Panel is that **CMP462 does meet** Ofgem's

Public

Urgency criteria<sup>1</sup>. Therefore, the recommendation of the Panel is that **CMP462 should** be treated as an Urgent CUSC Modification Proposal.

Panel members set out their rationale behind this decision:

- Panel members agreed with the Proposer's justification for Urgency
- There is a potential material governance risk when there are insufficient CUSC Panel members, meaning the Panel cannot achieve quoracy as required to fulfil its elected duties. This is particularly the case for urgent modifications where there maybe material commercial risks to Users. Granting urgency to this modification will expedite the process and limit the risk of quoracy not being reached. This modification therefore meets urgency criteria a).

### Procedure and Timetable

The Panel discussed an appropriate timetable for **CMP462** in the instance that urgency is granted.

The Panel agreed that **CMP462**, subject to Ofgem's decision on Urgency, should follow the attached Code Administrator's proposed timetable (Appendix 1 **Urgent recommendation**). In Appendix 2 of this letter, the Code Administrator has also provided the timeline if this follows standard timescales with the assumption that Panel prioritise this high in the prioritisation stack.

Panel noted that if urgency is required, there would be;

- Code Administrator Consultation period of less than 15 Business Days;
- There would be less than 5 clear Business Days for Panel to check that their Recommendation Vote had been recorded correctly

Under CUSC Section 8.24.4, we are now consulting the Authority as to whether this Modification is an Urgent CUSC Modification Proposal.

Please do not hesitate to contact me if you have any questions on this letter or the proposed process and timetable. I look forward to receiving your response

Yours sincerely

*Anthony Pygram*

---

<sup>1</sup> Ofgem's current view is that an urgent modification should be linked to an imminent issue or a current issue that if not urgently addressed may cause:

- a) A significant commercial impact on parties, consumers or other stakeholder(s); or
- b) A significant impact on the safety and security of the electricity and/or gas systems; or
- c) A party to be in breach of any relevant legal requirements.

Public

Anthony Pygram  
Independent Chair of the CUSC and Grid Code Panel

### Appendix 1– Urgent Timeline

Modification Stage	Date
Modification presented to Panel	31 October 2025
Ofgem grant Urgency	05 November 2025 (by 5pm)
Code Administrator Consultation (10 Business Days)	06 November – 20 November 2025
Draft Final Modification Report (DFMR) issued to Panel (5 Business Days)	04 December 2025
Panel undertake DFMR recommendation vote	12 December 2025
Final Modification Report issued to Panel to check votes recorded correctly	12 December 2025
Final Modification Report issued to Ofgem	12 December 2025
Ofgem Decision	TBC
Implementation Date	5 Business Days following Authority Decision

### Appendix 2 – Standard Timeline

Modification Stage	Date
Modification presented to Panel	31 October 2025
Code Administrator Consultation (15 Business Days)	06 November – 27 November 2025
Draft Final Modification Report (DFMR) issued to Panel (5 Business Days)	04 December 2025
Panel undertake DFMR recommendation vote	12 December 2025
Final Modification Report issued to Panel to check votes recorded correctly	15 December 2025
Final Modification Report issued to Ofgem	23 December 2025
Ofgem Decision	TBC
Implementation Date	5 Business Days following Authority Decision

### Appendix 3 – Panel Urgency Vote

See separate attachment