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Code Administrator Meeting

Summary

Workgroup Meeting 10: CMP417 Extending principles of CUSC Section 15 to all Users

Date: 21 October 2025

Contact Details

Chair: Robert Hughes, Robert.Hughes@neso.energy

Proposer: Sean Nugent, Sean.Nugent@neso.energy

Key areas of discussion

The Chair outlined the agenda of the meeting, which included an update of the Actions, Proposer's solution and legal text.

Click [here](#) to view the Proposer's update on the solution.

Actions

Actions 10 and 11 were closed in the Workgroup. Click [here](#) to view Action updates from the Proposer.

The following discussions were:

- **Action 9** – The Proposer anticipates bringing the worked examples by Workgroup 12.
- **Action 10** – DNO Solution

Incremental Capacity

The Proposer addressed how liability should be calculated for incremental capacity increases at existing generator or demand sites, confirming that the current approach used for Generation is to base liability only on the increase (incremental capacity), not the total capacity.

It was emphasised that this aligns with the original intention of CMP192, which was to base liability on new capacity, and stated there is no intention in changing to an approach which would increase liability for some generators. The same method is proposed for demand sites, meaning that if a connected

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demand site applies for a Modification Application to increase their demand capability, only the increase will be taken into account.

The Proposer acknowledged that the current legal text may not clearly specify this incremental approach and are considering this. They reiterated that, in principle, the same treatment should apply whether increasing capacity at an existing site or connecting a new site at a similar location.

A Workgroup member queried whether reductions in demand would also trigger cancellation liabilities, noting that reductions in generator tech do trigger such liabilities. The Proposer confirmed that reductions in demand will also trigger cancellation liabilities, aiming for alignment between generation and demand processes. Consideration has been given as how to apply this to older sites where demand capability data may not be available, but stated that in general, reductions will be included.

ENA meeting

The Proposer advised a meeting had taken place with the DNOs and were given feedback on the solution. Slide 8 sets out the details [here](#). Discussions from the Workgroup were:

- A Workgroup member pointed out that DNO requests for transmission capability may not directly match embedded user requirements due to active management, flexible connections and varying operating conditions. This makes a one-to-one mapping unlikely and the importance of the DNO's judgment in providing the correct Demand Capability figures.
- The Proposer suggested separating aggregate-driven works from those driven by individual customers, aiming for consistency with generation-side processes. Guidelines for DNOs on providing demand capability figures, including both aggregate and customer-driven scenarios are being considered. This will ensure clear, consistent principles in liability calculations for DNO management.
- A Workgroup member asked how demand site names would be collected and if they'd be included with embedded generation in statements of works. The Proposer responded the process is still being defined and will be clarified. **Action 13**

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- A Workgroup member queried if applications could include both embedded generation and demand, and if BEGA customers would be separate. The Proposer confirmed BEGA would be separate.
- A Workgroup member asked if one application would result in multiple security statements or if liability would be split. The Proposer responded that generation and demand will have separate statements and will provide an example. **Action 14**
- **Action 11** – The Proposer explained to the Workgroup hybrid sites (with both generation and demand) currently receive two separate security statements, one for Generation User Commitment and one for Demand Final Sums. Going forward it is proposed that there would still be two separate security statements for these sites to include the different calculations for Generation and Demand. Works attributable to both, should be applied only to the statement with the higher MW rating to avoid duplication.

The Proposer noted a potential issue with fixing securities: if one component (generation or demand) is cancelled after fixing, works may not be properly attributed to the remaining component. Solutions are being considered and will follow up in the next workgroup.

Workgroup feedback:

- A Workgroup member asked about works specific to export (generation) and the Proposer clarified these should only be attributed to the generation statement, with the duplication rule only applying when works are attributable to both.
- A Workgroup member suggested security should only apply to the element triggering reinforcement, not both, to avoid unnecessary securitisation. The Proposer acknowledged this but said the current approach favours simplicity, though will discuss further in the STC Mod CMP093.
- Workgroup members discussed demand behind the meter and contractual visibility, with the Proposer clarifying that only visible contractual requirements are considered for separate security statements.
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Proposer's Solution

Implementation

The Proposer presented initial thoughts on implementation displaying project number which can be found on slide 14 [here](#). The focus was whether demand projects already have a demand capability figure available via the connections portal, suggesting a smooth transition from final sums to user commitment is feasible, though a small number of cases without the figure will need to be checked.

A Workgroup member required clarification that the data discussed refers to transmission projects, not individual embedded applications in which the Proposer confirmed DNO mod apps would be counted as a single customer in this context.

Legal Text

Section 15 – The proposer shared the proposed legal text in track changes with the Workgroup. Discussions arose from that were:

- Section 15, which governs user commitment, will be updated to integrate demand alongside generation, using the same principles and adding demand-specific terms where needed.
- A new definition, such as for "demand capacity" (potentially aligning with "demand limit" in BCAs), "distribution connected demand," and extending "attributable works" to include demand were required for Section 11.
- The Workgroup debated the best structure for user categories in Section 15, with suggestions to reorder or clarify bullets for direct connections, DNOs and embedded users for clarity and consistency.
- There was agreement not to introduce a BEGA-equivalent for demand, but to ensure embedded demand connections that trigger works are properly captured.
- The approach to the wider cancellation charge was discussed, confirming that the liability will be split between generation and demand, with the user risk factor wording updated accordingly.

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- A guidance documentation was suggested for CMP417 to assist once implemented.

Workgroup Consultation

The Chair advised the Workgroup Consultation will be added to the collaboration space for Workgroup members to view, make comments and consider specific questions prior to the next Workgroup meeting on 12 November.

Timeline

The Chair shared the new timeline with the Workgroup pointing out the additional Workgroups inserted moving the final modification date to September 2026. A Workgroup member suggested making the Workgroup Consultation from 15 to 20 business day due to school holidays.

AOB & Next Steps

The Chair advised the legal text and Workgroup Consultation will be added to the collaboration space and the link will be circulated a week before the scheduled 12 November Workgroup.

Actions

To review the full action log (post hiatus) click [here](#)

Action Number Raised	Workgroup	Owner	Action	Due by	Status
9	WG7	SN/MC	Consider in more detail what happens with SIF for Generation, particularly for connection sites and one off works <i>Update: Proposer to look into examples which show financial impact at a future workgroup.</i>	WG12	Open

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Further update:

consider how one-off works
are split between multiple
customers, specifically
whether they should be
allocated based on
capacity or another
principle

10	WG7	SN/MC	Consider and finalise solution for DNOs. Update: Proposer to liaise with legal to amend text to deal with increase in Demand capability.	WG9	Closed
11	WG7	SN/MC	Discuss use of TORIs with TOs and whether this is required in the solution <i>Update: Proposer to provide a more detailed example for the next Workgroup.</i> <i>Further Update: Proposer to consider Workgroup Comments with two connection points.</i>	WG9	Closed
12	WG7	SN/MC	Provide summary of solution within Workgroup Consultation document	WG9	Open

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13	WG10	MC	Further consider how embedded customer information will be collected and provide an example.	WG11	Open
14	WG10	MC	Consider whether Demand customers will be added to a document similar to a Statement of Works or Appendix G table	WG11	Open

Attendees

Name	Initial	Company	Role
Robert Hughes	RH	NESO	Chair
Tametha Meek	TM	NESO	Technical Secretary
Martin Cahill	MC	NESO	Proposer
Sean Nugent	SN	NESO	Proposer Alternate
Charles Deacon	CD	Eclipse Power Networks	Workgroup Member
Christopher Patrick	CP	Ofgem	Authority Representative
Damian Clough	DC	SSE	Workgroup Member
Folashadé Popoola	FP	NESO	Subject Matter Expert
Hamzah Ahmed	HA	Everwell Development Limited	Observer
Harriet Eckweiler	HE	SHET	Workgroup Member
Jack Purchase	JP	NGED	Workgroup Member Alternate

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Jonathan Clark	JC	SHET	Workgroup Member Alternate
Kirsty Dawson	KD	Statkraft	Workgroup Member
Matthew Paige-Stimson	MPS	NGET	Workgroup Member
Michael Kavney	MK	NGED	Workgroup Member Alternate
Nadir Syed	NS	UKPN	Observer
Natalija Zaiceva	NZ	UKPN	Observer
Ollie Easterbrook	OE	NGED	Workgroup Member
Paul Smillie	PS	SPT	Workgroup Member Alternate
Pete Aston	PA	Statkraft UK	Workgroup Member Alternate
Steve Baker	SP	NESO	Observer
Steve Halsey	SH	UK Power Networks	Workgroup Member
Tim Ellingham	TE	RWE	Workgroup Member