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Nadir Hafeez  
Ofgem  
**By email**

Anthony Pygram  
Independent Chair CUSC & Grid Code Panel

14 November 2025

CMP463 Urgency Request

Dear Nadir,

Connection and Use of System Code (CUSC) Modification Panel Request for Urgency and Recommended Timetable for **CMP463: Stabilising the Specific Onshore Expansion Factors from 1st April 2026**.

On 04 November 2025, SSE Generation raised **CMP463**. The Proposer sent a request to the CUSC Panel Secretary for this modification to be treated as urgent.

**CMP463** seeks to hold those Specific Expansion Factors at 2025/26 levels, similar to the CMP353 approach, ahead of a larger more fundamental review of TNUoS.

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

<https://www.neso.energy/industry-information/codes/cusc/modifications/cmp463-stabilising-specific-onshore-expansion-factors-1st-april-2026>

The CUSC Modifications Panel ("the Panel") on 14 November 2025, considered **CMP463** 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).**

*it is the Proposer's view that if the existing defect is not rectified in Urgent timescales, then this will have a significant commercial impact on Parties. The largest commercial impact is on any Generator that pays TNUoS and is connected in Shetland, while a large commercial impact is also experienced by other Generators in Scottish TNUoS charging zones. The recently published NESO five-year TNUoS forecast In September 2025 showed a substantial increase in a local circuit tariff (when compared to the previous forecast). For example, the Viking Windfarm connects to a circuit which is subject to a Specific Expansion Factor which will increase substantially.*

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## 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 **CMP463 does meet** Ofgem's Urgency criteria<sup>1</sup>. Therefore, the recommendation of the Panel is that **CMP463 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 rationale on urgency.
- NESO is conditionally supportive of CMP463 and the request for urgency. Non-specific expansion factors are frozen following the implementation of CMP353 and freezing the specific expansion factors would make this consistent and avoid unexpected increases for the small minority of sites near relevant circuits.
- NESO notes that it has a licence obligation to publish final TNUoS tariffs by 31 January each year. Failure to deliver the tariffs will significantly impact all transmission network stakeholders. Therefore, NESO must consider any modification that propose to change TNUoS tariffs after the end of September very carefully.
- The proposed timeline for CMP463 states an Ofgem decision on 13 January 2026. This timeline adds extra workload and risk to NESO as NESO will need to model, build and test tariffs without a stable set of input data. That risk has been assessed and deemed an acceptable level of risk. However, NESOs support for this modification is conditional on that timeline being met. If that timeline is delayed, then NESO risks being unable to publish TNUoS tariffs on time and so would no longer support urgency.

## Procedure and Timetable

The Panel discussed an appropriate timetable for **CMP463** in the instance that urgency is granted.

The Panel agreed that **CMP463** 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;

<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.

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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*

Anthony Pygram  
Independent Chair of the CUSC and Grid Code Panel

### Appendix 1– Urgent Timeline

Modification Stage	Date
Modification presented to Panel	14 November 2025
Ofgem Decision on Urgency	By 21 November 2025 (5pm)
Code Administrator Consultation	25 November – 28 November 2025
Draft Final Modification Report (DFMR) issued to Panel	04 December 2025
Panel undertake DFMR recommendation vote	12 December 2025
Final Modification Report issued to Panel to check votes are recorded correctly	12 December 2025
Final Modification Report issued to Ofgem	12 December 2025
Ofgem Decision	13 January 2026
Implementation Date	01 April 2026

### Appendix 2 – Standard Timeline

Modification Stage	Date
Modification presented to Panel	14 November 2025
Code Administrator Consultation	25 November – 16 December 2025
Draft Final Modification Report (DFMR) issued to Panel	22 January 2026
Panel undertake DFMR recommendation vote	30 January 2026
Final Modification Report issued to Panel to check votes are recorded correctly	30 January 2026
Final Modification Report issued to Ofgem	09 February 2026
Ofgem Decision	TBC
Implementation Date	01 April 2026

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### Appendix 3 – Panel Urgency Vote

See separate attachment