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Nadir Hafeez
Ofgem
By email

Anthony Pygram
Independent Chair CUSC & Grid Code Panel

12 December 2025

CMP465 Urgency Request Letter

Dear Nadir

Connection and Use of System Code (CUSC) Modification Panel Request for Urgency and Recommended Timetable for **CMP466: CMP456 consequential charging modification.**

On 02 December 2025, RWE raised **CMP466**. The Proposer sent a request to the CUSC Panel Secretary for this modification to be treated as urgent.

CMP466 is required to facilitate the implementation of CMP456. In discussions with the National Energy System Operator (NESO) it has become clear that a small change to the Balancing Services Use of System (BSUoS) within Section 14 'Charging Methodologies' will be required to ensure that any validated costs arising via the CMP456 solution are recovered, as happens today with black start costs, via BSUoS.

All documentation for this modification can be located via the following [link](#).

The CUSC Modifications Panel ("the Panel") on 12 December 2025 considered **CMP466** 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).

The root modification of the Grid Code under GC0168 will expose Generators to significant costs that could put legacy in financially unviable positions. This modification and CMP456 will mitigate this situation and also aid in the security of supply by allowing the NESO to have an accurate system model and Generators to keep low merit order plant in service.

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 majority view of the Panel is that **CMP466 does not meet**

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Ofgem's Urgency criteria¹. Therefore, the recommendation of the Panel is that **CMP466 should not** be treated as an Urgent CUSC Modification Proposal.

Panel members set out their rationale behind this decision:

- Some Panel members agreed with the Proposer's rationale for urgency.
- A Panel member did not consider the urgency criteria have been met for either CMP466 (nor the combination of both modifications). GC0168 is in progress, and while a timeline exists, there remains uncertainty on when it will be fully developed, and a modification report presented to Ofgem. Hence, they do not agree with the proposer that the modification is linked to "an imminent issue or a current issue that if not urgently addressed" will have a significant impact on parties. If CMP466 were progressed on a non-urgent basis, then, as the timeline and solution for GC0168 is developed over time, it may become apparent that the urgency criteria are met in the future. At that point, it may be appropriate for the Proposer to submit a further request for urgency and reconsideration by the Panel and Ofgem.
- A Panel member did not assess CMP466 as urgent as the basis for the urgency application is through its linkage to GC0168 which is not yet approved by the Authority and as has uncertain timelines for when it will be implemented (if approved).
- The view of a Panel member was, whilst this is intrinsically linked to CMP456, Ofgem has the discretion to aligning implementation for both modifications. Users are more impacted from CMP456 which determines if costs for impacted Users are recoverable. Whilst accurate collection of charges is important, it is not deemed to have a material impact on specific Users.
- A Panel member noted that GC0168 was raised in March 2024, with the FMR due to be submitted in June 2026, so this is not an imminent issue. A commercial impact has been stated in the proposal form, but a more detailed view of materiality, impacts and potential alternatives should be carried out through the non-urgent route.
- A view of a Panel member was that as GC0168 has not been approved, and it is unclear when a decision will be made on GC0168. It is unclear how CMP466 will impact when Users choose to start the work to meet the EMT model requirement that may be put in place due to GC0168. Any responsible User should consider the risk of GC0168 being approved and ensure the EMT model is provided to NESO to comply with the Grid Code. They believe the time allowed for a company to comply with the Grid Code without spending money at risk (i.e. before GC0168 is approved/rejected) is not in scope of CMP466 and therefore the impact of security of supply is part of the scope for GC0168. It is useful to note that GC0168 has not requested urgency.

¹ 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.

- The Panel member further explained that, from GC0168, it is unclear when Users will need to provide NESO an EMT model, and therefore, if the current uncertainty on cost recovery will have a significant commercial impact on Users. In addition, the non-urgent timeline appears to provide sufficient time for CMP466 to be sent to Ofgem for a decision before GC0168 is sent to Ofgem for a decision.
- A Panel member's view was that CMP466 did not meet the urgency criteria as they believe that the modification can be addressed as a high priority modification through the standard governance route.

Procedure and Timetable

The Panel discussed an appropriate timetable for **CMP466** in the instance that urgency is granted.

The Panel agreed that **CMP466** 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;

- A Workgroup Consultation period of less than 15 Business Days
- 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

Anthony Pygram

Independent Chair of the CUSC and Grid Code Panel

Appendix 1– Urgent Timeline

| Modification Stage | Date |
|---------------------------------|-----------------------|
| Modification Presented to Panel | 12 December 2025 |
| Workgroup Nominations | 12 – 19 December 2025 |

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|---|----------------------------|
| Ofgem Decision on Urgency | By 5pm on 19 December 2025 |
| Workgroups 1 – 2 | 06 January 14 January |
| Workgroup Consultation | 19 – 26 January 2026 |
| Workgroups 3 – 4 | 03 February 12 February |
| Workgroup Report issued to Panel | 19 February 2026 |
| Panel sign off that Workgroup Report has met its Terms of Reference | 27 February |
| Code Administrator Consultation | 02 – 09 March 2026 |
| Draft Final Modification Report (DFMR) issued to Panel | 19 March |
| Panel undertake DFMR recommendation vote | 27 March |
| Final Modification Report issued to Panel to check votes are recorded correctly | 27 March |
| Final Modification Report issued to Ofgem | 27 March |
| Ofgem Decision | TBC |
| Implementation Date | TBC |

Appendix 2 – Standard Timeline

| Modification Stage | Date |
|---|------------------------------------|
| Modification Presented to Panel | 12 December 2025 |
| Workgroup Nominations | 15 December 2025 – 08 January 2026 |
| Workgroups 1 – 2 | 03 February 12 February |
| Workgroup Consultation | 23 February – 13 March |
| Workgroups 3 – 4 | 23 March 09 April |
| Workgroup Report issued to Panel | 16 April |
| Panel sign off that Workgroup Report has met its Terms of Reference | 24 April |
| Code Administrator Consultation | 04 – 22 May |
| Draft Final Modification Report (DFMR) issued to Panel | 18 June |
| Panel undertake DFMR recommendation vote | 26 June |
| Final Modification Report issued to Panel to check votes are recorded correctly | 30 June – 07 July |
| Final Modification Report issued to Ofgem | 10 July |
| Ofgem Decision | TBC |
| Implementation Date | TBC |

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Appendix 3 – Panel Urgency Vote

See separate attachment