

# **CM093:** Extending the principles of the User Commitment Methodology to Final Sums Methodology as a consequence of CUSC Modification – CMP417

Workgroup 5, 20 January 2026

Online Meeting via Teams

# WELCOME

# Agenda

Topics to be discussed	Lead
Welcome	Chair
Action log	Chair
Objectives and Timeline	Chair
Workgroup Considerations	Proposer/ All
CMP417 Update	MC
Legal Text	Proposer
Draft Workgroup Consultation	Chair
Any Other Business	Chair
Next Steps	Chair

## Expectations of a Workgroup Member

Contribute to the discussion

Be respectful of each other's opinions

Language and Conduct to be consistent with the values of equality and diversity

Do not share commercially sensitive information

Be prepared – Review Papers and Reports ahead of meetings

Complete actions in a timely manner

Keep to agreed scope

Email communications to/cc'ing the .box email

## Your Roles

Help refine/develop the solution(s)

Bring forward alternatives as early as possible

Vote on whether or not to proceed with requests for Alternatives

Vote on whether the solution(s) better facilitate the Code Objectives



# Actions Log

Action Number	Workgroup raised	Owner	Action	Update	Due by	Status
3	WG2	MC	Provide generic examples from CMP417 to illustrate the changes and calculations.	Initially shared at WG3 Generic examples shown updated at CMP417 WG in Jan	WG3	Propose to close
4	WG3	SB	Align the legal text of CM093 with CMP417 and CMP103 to avoid discrepancies between codes.	Ongoing consideration as legal text develops Legal are reviewing Legal for both mods and interactions summary will be in Consultation Report	WG4	Open
5	WG3	RH/SB	Summarise interactions with other Connections Work and modifications.	Interacts with CMP417. No other interactions identified to date	WG4	Open
6	WG4	MPS	Regarding the volume of demand Users requiring securities in January 2027, provide a view from a TO perspective considering 2 stages- with TOCO in October.	See later slide...	WG5	Open

# Objectives and Timeline

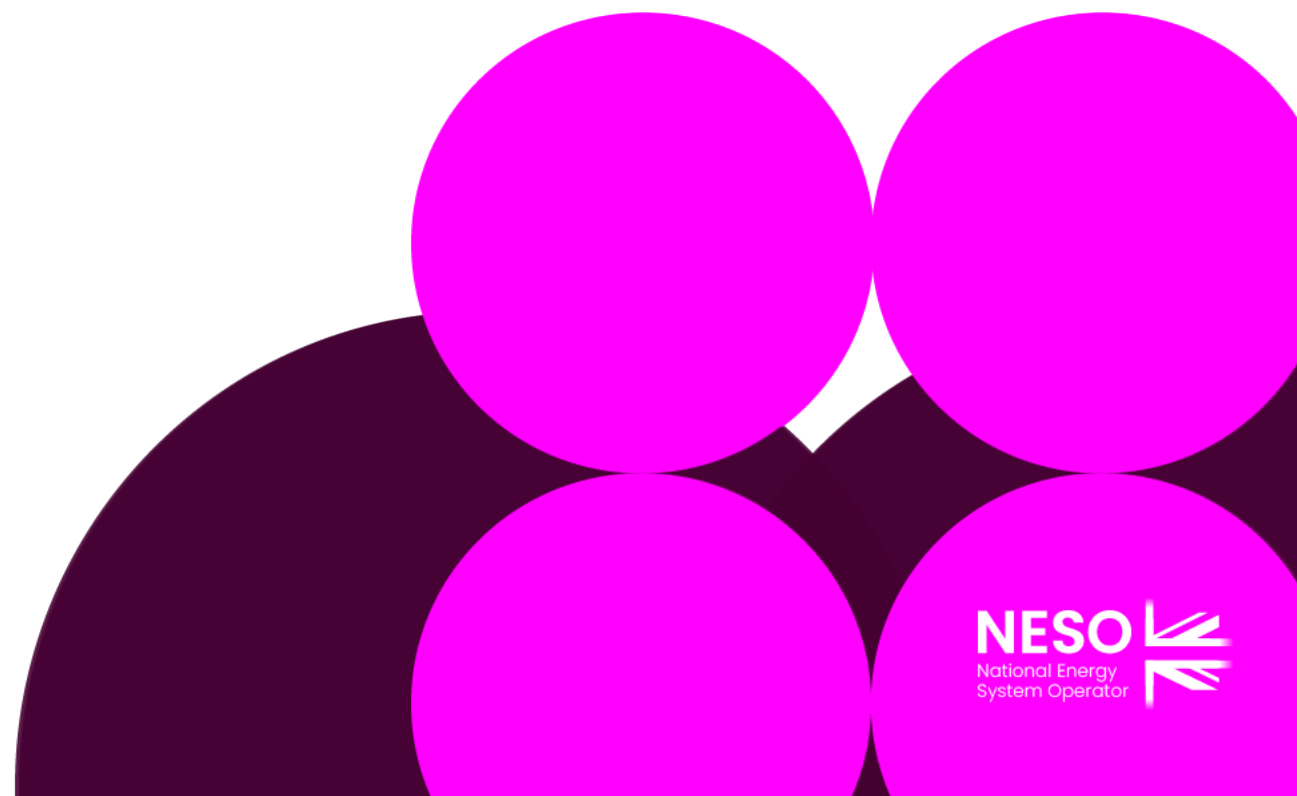
Robert Hughes – NESO Code Administrator

# CM093 and CMP417 Timelines

CM093	Workgroups/ Dates	CMP417	Workgroups/ Dates
Workgroup 4	01 December 2025	Workgroup 12	17 December 2025
Workgroup 5	20 January 2026	Workgroup 13	13 January 2026
<b>Workgroup Consultation</b>	26 January 2026 – 16 February 2026	<b>Workgroup Consultation</b>	19 January 2026 – 06 February 2026
Workgroup 6	26 February 2026	Workgroup 14	17 February 2026
Workgroup 7	23 March 2026	Workgroup 15	10 March 2026
Workgroup 8	08 April 2026	Workgroup 16	31 March 2026
<b>Workgroup Report to Panel</b>	14 April 2026	<b>Workgroup Report to Panel</b>	16 April 2026
<b>Post Workgroups</b>			
Code Administrator Consultation	28 April 2026 to 19 May 2026	Code Administrator Consultation	28 April 2026 to 19 May 2026
CM093 Draft FMR to Panel	16 June 2026	CMP417 Draft FMR to Panel	18 June 2026
CM093 FMR to Ofgem	09 July 2026	CMP417 FMR to Ofgem	09 July 2026
Ofgem decision	TBC	Ofgem decision	TBC
CM093 Implementation Date	10 Business Days after Authority Decision	CMP417 Implementation Date	10 Business Days after Authority Decision

# Workgroup Considerations

Steve Baker – NESO





# CM093 Action 6 update

**Regarding the volume of demand Users requiring securities in January 2027, provide a view from a TO perspective considering 2 stages- with TOCO in October.**

## **NESO-**

- There are currently 126 projects applicable to Final Sums.
- By January 2027 it is **estimated** that 177 demand projects will need to place some security

## **NGET-**

- As a very rough analysis of demand schemes, from the Final Sums dataset (filtering based on titles including Data, Rail, Steel, Hydrogen, DNO) to see how tapered the volume of agreements to fix more immediately *might* be.
- Approx 2/3 of TOCAs TOH and TOMM would need addressing for implementation.

# CM093 Considerations

- **Implementation timescales:**
- As previously discussed, the January 2027 securities run is target implementation date for CMP417 & CM093
- Aligns with the timeline for securities processes and allows some time following potential approval circa October 2026 to update processes.
- Regarding implementation timescales for January 2027 practical considerations for implementing the modifications and ensuring that TOs and other stakeholders have sufficient time to adapt processes.
- TOs processes to provide data for demand sites in addition to generation sites include:
  - Providing attributable works for demand sites (works needed to connect demand users to the nearest mixed node).
  - Ensuring updated scheme information is available using the new definitions.
- The Workgroup acknowledged that TOs might need significant lead time to make these changes, especially for updating their systems and processes.

# CM093 Considerations

- **Implementation timescales:**
- *How long do TOs require to make required changes to data sent to NESO? What else is needed to progress?*

## **NGET**

- Should not need a change in the 6 monthly process for implementation, just TOCAs.
- Having discussions internally with our PSM/CRM people to get their view on workload/timing, but given the type of resource concerned, with the other demands on their time, will play into achievable timescales too.

## **SHET**

- Would need 3 months from implementation date if it is a retrospective mod and 1 month if forward-looking. No additional consideration if pushed to July but lead times remain as above.

## **SP**

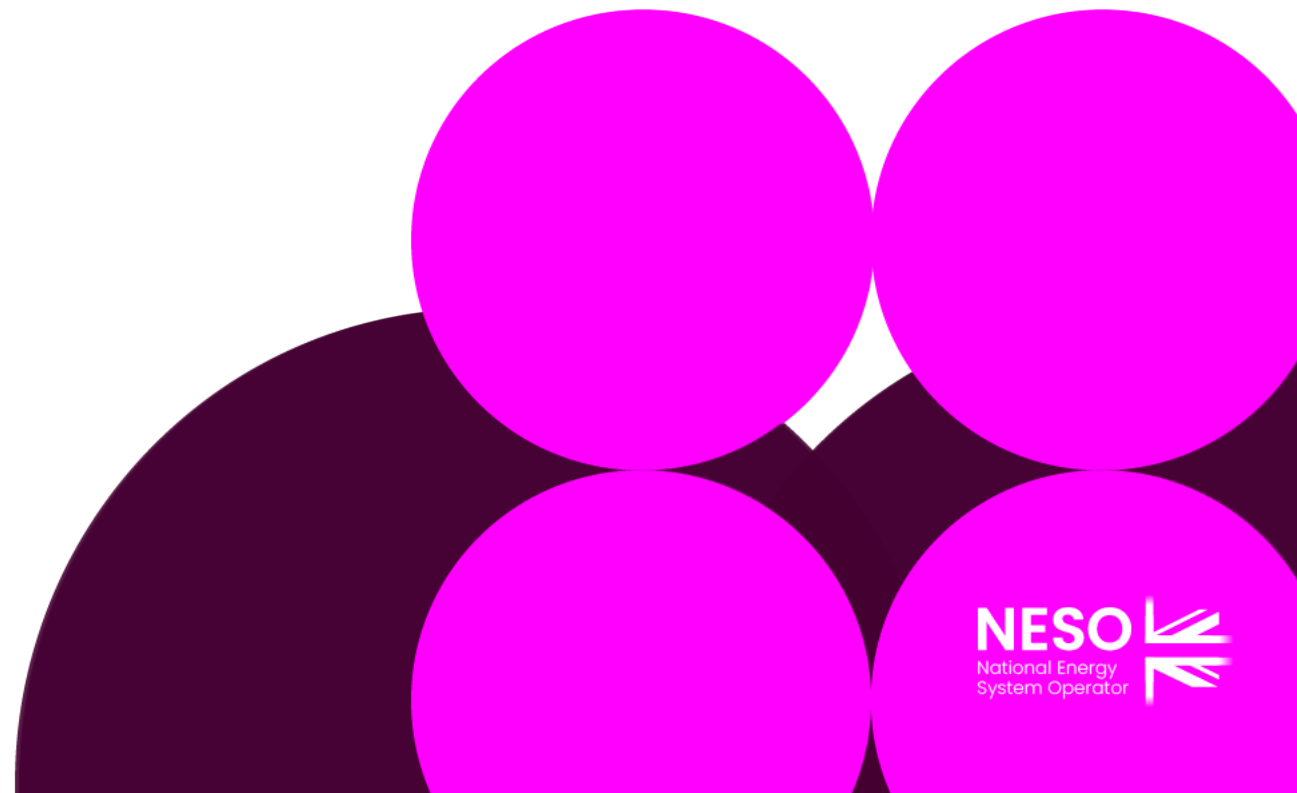
- Provided we have a clear understanding of the requirements, comfortable with the proposed updates to the required data and will be able to deliver this against the timescales detailed below, if receive the Ofgem approval by the end of October 2026 to allow us to finalise the requirements and complete the data extraction and relevant data quality checks.
  - Ofgem Decision: No later than 30th October 2026
  - Securities process starts: 2nd November 2026 (NESO send request to TOs)
  - TOs submit data: no later than 31st December 2026

# CM093 Considerations

- **Impacts/ interactions CMP417/ CM093:** TOs may need to send updated TOCOs to reflect the new securities calculations introduced by CMP417.
  - The Workgroup acknowledged that updating TOCOs would depend on the timing of Ofgem's approval, and the administrative workload required to implement the changes.
- **Legal Text solution:** draft CM093 solution has been shared with NESO Legal.
  - Potential changes to STC procedures (e.g., STCP 13-2) would require a separate modification proposal to ensure that the methodology for securities calculations is properly updated in the STC(P).
- **Guidance Note** considerations for Future Final Sums methodology- to be developed from solution at end of WG stage.
  - To clarify how the modifications would be implemented, particularly for hybrid sites and demand users.
  - Suggested that the guidance notes for CMP417 could also serve as a reference for CM093, avoiding duplication.
- **Stranded Investment:** covered as per TOs assessments of the feasibility of implementing SIF and LARF changes within the proposed timeline (e.g., January 2027 securities run).

# CMP417 Updates

Martin Cahill– NESO



# CM417 Workgroup 13

## Discussion Points from CMP417 Workgroup 13

- Ran through the workgroup consultation report (consultation due to go out 19<sup>th</sup> January)
- Draft legal text produced, some updates to be made before circulating alongside the consultation
- Shared finalised cost examples – showing a comparison of Final Sums vs User Commitment securities and liability
- Discussed TO data requirements and implementation timescales (see next two slides)



# Implementation – TO Feedback

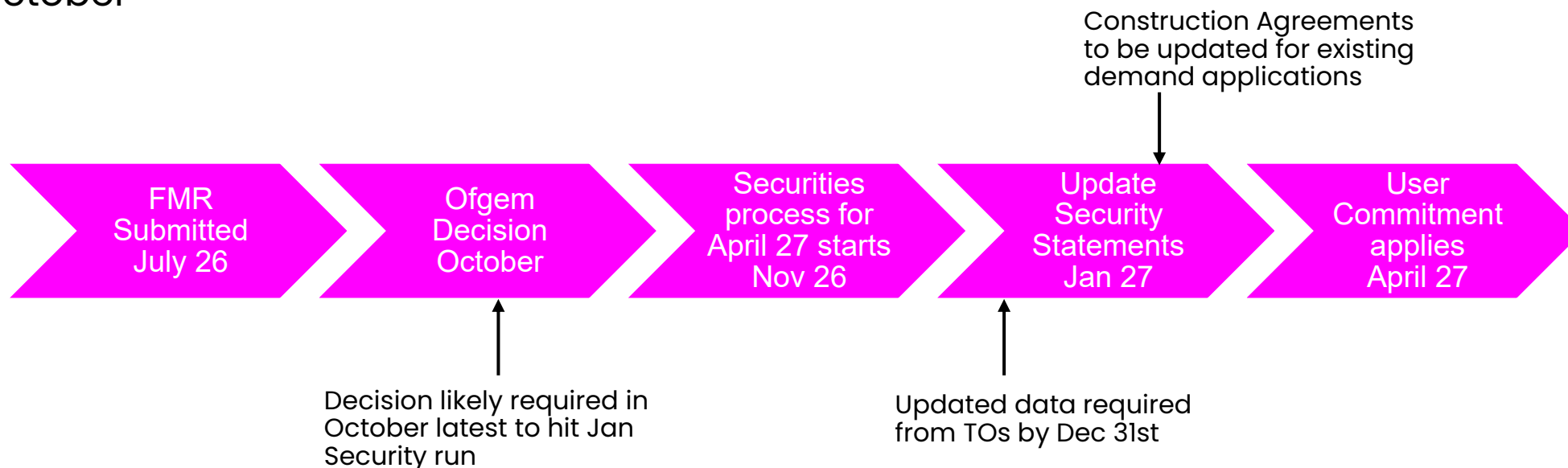
- Still investigating exact timeframes for receiving data from TOs
- Likely looking at minimum 2-3 months requirement for TOs to be able to provide full data set from decision date
- Part of data set is usually provided in TOCOs – need to understand if there is any efficiency in providing data separately on initial implementation with updated TOCOs to follow
- For January securities run TO data submission would be required by 31<sup>st</sup> December 2026

# Implementation – Summary

Current target is the January 2027 Securities Run

Remaining Steps:

- Confirm whether TOCOs need to be updated for initial implementation
- Identify contingency plan
- Confirm what decision date would be required for Jan 27 securities run – likely to be in October



# Legal Text consideration

Steve Baker – NESO



# CM093 Legal Text Considerations

Post Workgroup 4 Legal Text drafts have been accessible in the Collaboration Space for Workgroup members to comment and make suggestions.

NESO Legal have confirmed they are reviewing together with CMP417 legal text for context continuity

# CM093 Legal Text Considerations

Initial view of possible areas for legal text changes- to discuss at WG3 and shared on collaboration space post WG3

CODE	LEGAL TEXT	CONTENTS
STC	<b>Section D: Planning Co-ordination</b> See Section I	Not User facing section of STC- possibly not affected - confirm with NESO Legal
STC	<b>Section I: Transition</b> (or potentially <b>Section D</b> which currently documents the transition plan for CMP192 Transition)	There will be a 'transition period' for existing Users on Final Sums methodology to move to the new regime. New Part 3 to be inserted- confirm with NESO Legal
STC	<b>Section J: Interpretation and Definitions</b>	Amendments to term "Attributable Works". Mirror the CUSC Attributable Works definition Distributed Demand was to point to part b where the Attributable Works are worked out... to nearest MITS node.  Insert term "TO Final Sums" - If using the term, it will need defining, but check with Legal Confirm with NESO Legal whether this is needed and wording
STC	<b>Schedule 9, 7.5 Provision of Bi-annual estimate</b> TO Final Sums	This section refers to an estimate –consider how works should be structured in the TOCA and flow through to Construction Agreement which may require clarity to be added into this schedule. We suggest bringing this in line with CUSC Schedule 2, Exhibit 3 Part 2, and further defining Appendix H Part 1 – Enabling Works (work required for the User) and Part 2 – Wider Transmission Reinforcement Works (works required for wider system reasons);

# CM093 Legal Text Considerations

Initial view of possible areas for legal text changes- to discuss at WG3 and shared on collaboration space post WG3

CODE	LEGAL TEXT	CONTENTS
STC	<b>Schedule 9</b> , Section 12	Attributable Works –in conjunction with the CMP417 Workgroup align for clarity of Attributable works for Demand;
STCP	<b>STCP13–2 SIF &amp; LARF Methodology</b> Potential process amendments	Creation of a STCP SIF and LARF methodology for Final Sums methodology Users or an amendment to STCP13–2 SIF and LARF methodology  Would follow through as a separate SCTP Modification if required.
Guidance note	<b>Future Final Sums methodology guidance note</b>	Creation of a Future Final Sums methodology guidance note needs to be considered whether appropriate when modification is in later stages of development.



# Draft Workgroup Consultation

Robert Hughes – NESO Code Administrator



# Any Other Business

Robert Hughes – NESO Code Administrator



# Next Steps

Robert Hughes – NESO Code Administrator

