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## Workgroup Consultation Response Proforma

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

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to [stcteam@neso.energy](mailto:stcteam@neso.energy) by **5pm** on **16 February 2026**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact [stcteam@neso.energy](mailto:stcteam@neso.energy)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Stephen Baker	
<b>Company name:</b>	NESO	
<b>Email address:</b>	Stephen.baker@neso.energy	
<b>Phone number:</b>	07929724347	
<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input checked="" type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

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### I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Panel or the industry for further consideration)

### For reference the Applicable STC Objectives are:

- a) *efficient discharge of the obligations imposed upon Transmission Licensees by Transmission Licences and the Electricity Act 1989;*
- b) *efficient discharge of the obligations imposed upon the licensee by the Electricity System Operator licence, the Energy Act 2023 and Electricity Act 1989;*
- c) *development, maintenance, and operation of an efficient, economical, and coordinated system of electricity transmission;*
- d) *facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity;*
- e) *protection of the security and quality of supply and safe operation of the National Electricity Transmission System insofar as it relates to interactions between Transmission Licensees and the licensee\*;*
- f) *promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC;*
- g) *facilitation of access to the National Electricity Transmission System for generation not yet connected to the National Electricity Transmission System or Distribution System; and*

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*h) compliance with the Electricity Regulation and any Relevant Legally Binding Decisions of the European Commission and/or the Agency.*

*\* See Electricity System Operator Licence*

**Please express your views in the right-hand side of the table below, including your rationale.**

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives versus the current baseline?	Mark the Objectives which you believe the Original Solution better facilitates than the current baseline:
		<table border="1"> <tr> <td>Original</td> <td> <input type="checkbox"/>a <input type="checkbox"/>b <input type="checkbox"/>c <input checked="" type="checkbox"/>d <input type="checkbox"/>e <input type="checkbox"/>f  <input type="checkbox"/>g <input type="checkbox"/>h <input type="checkbox"/>none </td> </tr> </table>
Original	<input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d <input type="checkbox"/> e <input type="checkbox"/> f <input type="checkbox"/> g <input type="checkbox"/> h <input type="checkbox"/> none	
<p>d) CM093 makes changes in the STC to reflect CMP417 which extends CUSC Section 15 to all users and provides a more level playing field for demand Users. In the existing methodology it is possible to have disproportionately high securities because there is no process to apply sharing factors for reinforcement works which are required by more than one user. The Original Proposal would apply the User Commitment principles to demand, meaning that securities and liability more accurately reflect the 'share' of works triggered by a project.</p> <p>f) CM093 makes changes in the STC to reflect and facilitate CMP417 of which the Original Proposal would bring all Users under CUSC section 15. Having requirements for all users in the same section provides greater efficiency, both in administering CUSC arrangements, and in applying any potential future changes.</p>		
2	Do you support the proposed	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No

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	implementation approach?	As per Ofgem letter issued 13 <sup>th</sup> February, they are working together with NESO to decide on the most appropriate approach to implementation.
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the <a href="#">Workgroup Consultation</a> Section) <input checked="" type="checkbox"/> No  N/a
5	Does the draft legal text satisfy the intent of the modification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  The legal Text is still being finalised, but from discussions with TOs to date NESO believes that satisfactory changes will be agreed to reflect CMP417 changes to the CUSC.

## Specific Workgroup Consultation questions

6	Do any specific parts of the solution require additional clarification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Legal text being finalised as per answer to 5.