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## CUSC Modification Proposal Form

# CMP477: Facilitating Cross-TO Area Connection Modifications

**Overview:** This modification enables cross-Transmission Owner area connection change requests.

### Modification process & timetable

1	<b>Proposal Form</b> 13 May 2026
2	<b>Workgroup Consultation</b> 08 July 2026 – 14 July 2026
3	<b>Workgroup Report</b> 28 July 2026
4	<b>Code Administrator Consultation</b> 31 July 2026 – 07 August 2026
5	<b>Draft Final Modification Report</b> 11 August 2026
6	<b>Final Modification Report</b> 14 August 2026
7	<b>Implementation</b> 01 September 2026

**Status summary:** The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.

### This modification is expected to have a: Medium impact

Generators and Demand customers, NESO, Transmission Owners (including Competitively Appointed Transmission Owner (CATOs)) and consumers.

### Proposer's recommendation of governance route

Urgent modification to proceed under a timetable agreed by the Authority (with an Authority decision)

### Who can I talk to about the change?

**Proposer:** Garth Graham, SSE Generation  
garth.graham@sse.com  
01738 456000

### Code Administrator Contact:

cusc.team@neso.energy

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## What is the issue?

Connection parties are currently unable to submit a Modification Application<sup>1</sup> to request a change of connection point that would result in moving from one Transmission Owner (TO) area to another. This restriction means Developers cannot respond to updated system information, strategic planning outputs, or network constraints by proposing a more suitable connection location, even where such changes may benefit the wider electricity system.

## Why change?

The electricity system is transitioning toward whole-system strategic planning, including connection queue reform and the development of Strategic Spatial Energy Plans and Central Strategic Network Planning. Preventing connection parties from requesting a change of TO area is inconsistent with this direction and risks locking projects into sub-optimal locations.

Developers can already request changes to connection locations within a TO area (for example, from Red House<sup>2</sup> to Cockenzie<sup>3</sup>, both within the Scottish Power Transmission (SPT) area), and NESO can relocate connection points where this is in the system interest through the Connections Reform Design Methodology.

Given that the NESO can legally seek to change the connection point, it is not clear to the Proposer why they (the Developer) can't make a request to apply to move their point of connection from one TO area to another TO area, such as from Red House (SPT, TO) to Blyth<sup>4</sup> (National Grid Electricity Transmission (NGET), TO). Allowing connection parties to request equivalent changes through a formal, governed route would support a more consistent and transparent approach to connection siting.

Furthermore, the STCP 16-1 process operates on the basis that multiple 'Affected Transmission Owners' may be required to undertake assessment activity for a single connection application. Extending this approach to requests that cross TO areas would therefore build on existing processes rather than introduce a fundamentally new requirement.

This is also consistent with the principle of "*Good Industry Practice*" as defined in CUSC Section 11<sup>5</sup>, in terms of what can reasonably be expected of a skilled and experienced

<sup>1</sup> Also known as a 'ModApp'.

<sup>2</sup> In Fife, on the east coast of Scotland.

<sup>3</sup> To the east of Edinburgh, on the east coast of Scotland.

<sup>4</sup> To the north of Newcastle, on the east coast of England.

<sup>5</sup> "*in relation to any undertaking and any circumstances, the exercise of that degree of skill, diligence, prudence and foresight which would reasonably and ordinarily be expected from a skilled and experienced operator engaged in the same type of undertaking under the same or similar circumstances*"

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operator under the same or similar circumstances. Assessing connection changes across TO areas would therefore be within the reasonable expectations of existing good industry practice.

Allowing a formal route for Developers to request a TO area change would improve fairness, increase transparency, and support more efficient system outcomes.

## What is the Proposer's solution?

Amend the relevant sections of the CUSC to explicitly permit a connection party to submit a Modification Application to request a change of connection point that would move the project from one TO area to another TO area. The request would be subject to:

- Appropriate technical and economic assessment;
- Engagement with the relevant TOs and NESO (with any additional costs, for system studies etc., recovered via existing arrangements); and
- No automatic entitlement to approval of the request.

### Draft legal text

The proposed legal text changes would primarily amend CUSC Sections 6.9 and 6.10 (Modifications and New Connection Sites) to clarify that a Modification Application may include a request to change the Connection Site where this results in a change of TO area.

Consequential amendments may also be required to Exhibit I (Modification Application) to ensure the application form supports such requests, and to Section 11 (Definitions) where necessary to ensure consistency of terminology.

## What is the impact of this change?

This modification enables better alignment with strategic planning outputs, supporting delivery of Clean Power Plan 2030 and Net Zero. It reduces the risk of inefficient investment by TOs as Generators and Demand Developers will be able to request to optimise their project connection location, in turn reducing the risk of inefficient investment by TOs, whilst improving fairness. Additionally, it facilitates Developer projects being able to respond to the Transmission Network Use of System (TNUoS) locational

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signals by requesting to shift location; for example from Cockenzie to Grimsby West<sup>6</sup> or Red House to Blyth.

Overall, this change has a positive impact:

- **Generators and Demand customers:** Greater flexibility to align their projects with system needs.
- **NESO:** Clearer governance route for assessing TO area changes.
- **TOs (including CATOs):** More efficient siting and competition-neutral connection decisions.
- **Consumers:** Lower system costs through improved siting and reduced network inefficiencies.

Proposer's assessment against CUSC Non-Charging Objectives	
Relevant Objective	Identified impact
(i) The efficient discharge by the Licensee of the obligations imposed on it by the Act and by this licence*;	<p><b>Positive</b></p> <p>The modification supports the efficient discharge of NESO's statutory and licence obligations by providing clarity on the scope of permissible Modification Applications during the connections reform period. This enables more consistent, transparent and timely decision-making in the administration of</p>

<sup>6</sup> To the south of Hull, on the east coast of England.

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	connection arrangements.
(ii) Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;	<p><b>Positive</b></p> <p>The modification facilitates effective competition by ensuring connection arrangements do not unduly constrain Developers' ability to respond to evolving system conditions and strategic planning outputs. This is consistent with the intent of wider connections reform to remove unnecessary barriers to efficient market participation.</p>
(iii) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency **; and	<p><b>Neutral</b></p> <p>The modification is neutral in respect of compliance with the Electricity Regulation and other legally binding decisions. It does not alter charging, access rights, or operational obligations and operates within the</p>

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	existing regulatory framework.
(iv) Promoting efficiency in the implementation and administration of the CUSC arrangements.	<p><b>Positive</b></p> <p>The modification promotes administrative efficiency by clarifying CUSC processes during a period of significant reform and change. This aligns with <a href="#">CMP471</a> and <a href="#">CMP473</a> in providing procedural certainty and reducing the risk of inconsistent or ad-hoc interpretation.</p>

\* See Electricity System Operator Licence

*\*\*The Electricity Regulation referred to in objective (iii) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.*

### Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories

Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	<b>Neutral</b>

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	No impact
Lower bills than would otherwise be the case	<b>Positive</b> By better aligning connections with Developer and system requirements, costs will be lower for Developers, which will flow through to consumers via lower energy costs. Additionally, it will support more efficient TO investment and less stranded asset risk.
Benefits for society as a whole	<b>Positive</b> By better aligning connections with Developer requirements, it reduces the risk of project attrition, leading to more connections happening sooner, supporting delivery of Clean Power and Net Zero. At the same time, it reduces inefficient queue outcomes and the need for later corrective actions, reducing potential misaligned network build, which will avoid increased consumer cost.
Reduced environmental damage	<b>Neutral</b> No impact
Improved quality of service	<b>Neutral</b> No impact



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## When will this change take place?

### Implementation date:

01 September 2026, to align with the connections reform application window opening<sup>7</sup>.

### Date decision required by

26 August to support the Implementation Date.

### Implementation approach

Implementation would be delivered via updates to the CUSC to clarify the scope of permissible Modification Applications, with assessment undertaken through existing governance and technical processes.

### Proposer's justification for governance route

Governance route: Urgent modification to proceed under a timeline agreed by the Authority (with an Authority Decision),

This modification is necessary to avoid locking in inefficient connection outcomes during the connection process.

This modification meets Ofgem's urgency criteria as it addresses an imminent, time-critical issue (arising with the first, and subsequent, CMP434 application window), within the ongoing connections reform process.

The current CUSC framework permits connection parties to request a within TO area location change but prevents connection parties from requesting a location change with another TO area (i.e. between two TO areas).

Thus, in a hypothetical example, a project could (in the baseline) submit a 'ModApp' to move a project's location from Thurso (in the far north of the TO area) to Abernethy<sup>8</sup> (in

<sup>7</sup> Whilst, at the time of writing, no confirmation has been received (from NESO) of the date when the first (CMP434) application window will open, we have been advised by NESO of their broad approach for setting such a date and believe (based on this latest information, which may be subject to change) that a post 1<sup>st</sup> September date (for that window opening) is a reasonable assumption at this moment in time. In setting this date we have also been mindful of the other urgent CUSC Modifications that are currently under assessment – in discussion with the Codes Team of the NESO and the Connections Team of NESO, we believe that this 1<sup>st</sup> September date will allow the assessment to commence (on this Modification) from early July, after work on those other urgent CUSC Modifications is broadly concluded and we intend to fully utilise the intervening period (i.e. the month of June) to continue further discussions with the Connections Team of NESO (and involve the TOs).

<sup>8</sup> To the east of Perth / west of Dundee, on the River Tay estuary.

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the far south of same TO area), but cannot (in the baseline) make a 'ModApp' to move a project from Abernethy to Red House (less than one tenth the distance between Thurso and Abernethy).

As a result, Developers are unable to respond to updated system information, constraints and strategic planning outputs during a period when connection positions are actively being reassessed, by all concerned, in light of the changing framework and policy landscape.

Failure to resolve this urgently will result in:

- **Significant commercial impacts**, with Developers locked into suboptimal connection locations during the current reform process, without the ability to apply to revisit these decisions (in terms of TO – TO location change) once positions are fixed.
- **Inefficient system outcomes**, as projects are progressed in misaligned locations, driving increased constraint costs, avoidable network reinforcement and the risk of stranded or suboptimal investment.
- **Irreversible consequences**, as the ongoing connections reform process will establish enduring connection positions and rights. If not addressed now, the opportunity for relevant projects to optimise siting through this modification will be lost.

This issue is therefore immediate if not addressed within the current reform timetable and ahead of the first (CMP434) application window.

In line with CMP471, urgent progression is required to ensure that connection arrangements can adapt to evolving system needs and strategic planning outputs. Without urgency, the standard timetable would deliver implementation too late to influence connection decisions, significantly undermining the value to end consumers, network owners, the NESO and Developers of the change.

## Interactions

<input checked="" type="checkbox"/> CUSC	<input type="checkbox"/> BSC	<input checked="" type="checkbox"/> STC	<input type="checkbox"/> SQSS
<input type="checkbox"/> European	<input type="checkbox"/> EBR Article 18	<input type="checkbox"/> Other	<input type="checkbox"/> Other
Network Codes	T&Cs <sup>1</sup>	modifications	

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This modification would clarify how cross-Transmission Owner area modification application ('ModApp') requests are supported by NESO and affected Transmission Owners.

## Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CATO	Competitively Appointed Transmission Owner
CMP	CUSC Modification Proposal
CUSC	Connection and Use of System Code
EBR	Electricity Balancing Regulation
GC	Grid Code
NESO	National Energy System Operator
NGET	National Grid Electricity Transmission (the TO for England & Wales)
SPT	Scottish Power Transmission (the TO for central and southern Scotland)
SQSS	Security and Quality of Supply Standards
STC	System Operator Transmission Owner Code
STCP	System Transmission and Control Programme
T&Cs	Terms and Conditions
TNUoS	Transmission Network Use of System
TO	Transmission Owner