Public

CMP470: Introducing an Oversubscribed Technologies Commitment Fee

Workgroup Meeting 6

Tuesday 12 May 1.30pm

Online Meeting via Teams

NESO
National Energy System Operator

WELCOME

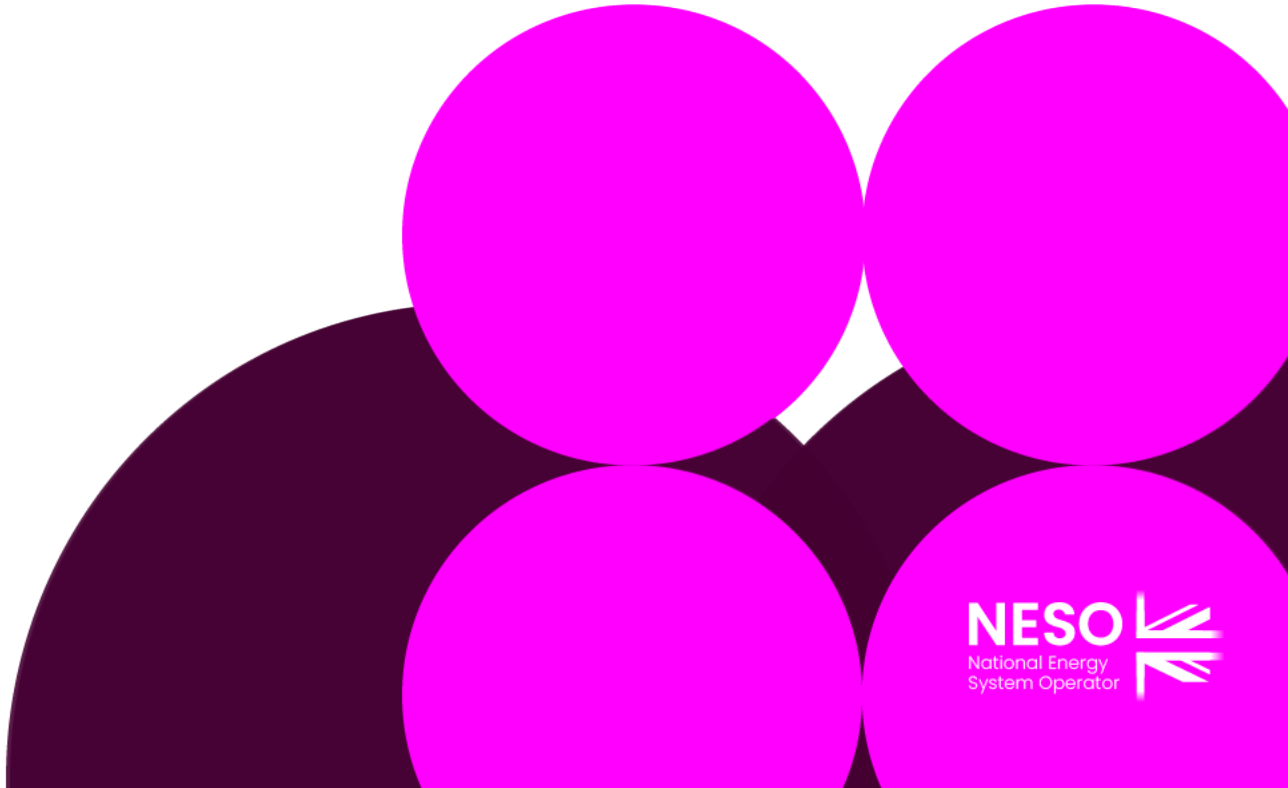
NESO
National Energy System Operator

Agenda

Topics to be discussed	Lead
Workgroup Responsibilities and Expectations	Chair
Objectives and Timeline	Chair
Action and Query Log Update	Chair
Data Discussion	All
Proposer Update	Proposer
Alternative Requests Discussion and Updates	All
Alternative Vote	All
Timeline Extension Discussion	Chair
Any Other Business and Next Steps	Chair

Workgroup Responsibilities and Membership

Claire Goult – NESO Code Administrator



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

Workgroup Membership

Role	Name	Company	Industry Sector
Proposer	Andrew Enzor	Field Energy	Battery Storage
Workgroup Member	Ahmed Dabb	Aura Power	Generator
Workgroup Member	Andrew Dudkowsky	NESO	National Energy System Operator
Workgroup Member	Alex Ikonic	Roadnight Taylor	Specialist Consultant
Workgroup Member	Andrew Yates	Statkraft	Generator
Workgroup Member	Charles Deacon	Eclipse Power Networks	Network Operator
Workgroup Member	Charles Saywell	Apatura Energy	Developer
Workgroup Member	Charlie von Schmieder	Gresham House	Battery Storage Owner/Developer
Workgroup Member	Chris Terry	Fidra Energy	Generator
Workgroup Member	Ciaran Fitzgerald	ScottishPower Renewables	Generator
Workgroup Member	Claire Hynes	RWE	Generator
Workgroup Member	Dennis Gowland	Research Relay Ltd	Other
Workgroup Member	Gareth Williams	Scottish Power Transmission	Onshore Transmission Licensee
Workgroup Member	Garth Graham	SSE Generation	Generator
Workgroup Member	Gary Camplejohn	Harmony Energy Ltd	Generator

NESO
National Energy System Operator

Role	Name	Company	Industry Sector
Workgroup Member	George Radcliffe	Ecoenergy	Generator
Workgroup Member	Grahame Neale	LightsourceBP	Generator
Workgroup Member	Grant Rogers	Q Energy	
Workgroup Member	Helen Stack	Centrica	Generator
Workgroup Member	Henry McDonald	Voltwise Power Holdings Limited	Other
Workgroup Member	Joe Colebrook	Innova	Generator
Workgroup Member	Julia McGee	Orsted	Generator
Workgroup Member	Kimbrah Hiorns	EDF Power Solutions	Generator
Workgroup Member	Kyran Hanks	Waters Wye	Other
Workgroup Member	Lamin Saidy	Qair UK	Generator
Workgroup Member	Lee Wilkinson	On Path Energy	Generator
Workgroup Member	Matthew Paige-Stimson	NGET	
Workgroup Member	Mithun Suresh	MASDAR	Investor/Developer
Workgroup Member	Navdeep Singh Gora	Northen Powergrid	Network Operator
Workgroup Member	Ollie Easterbrook	National Grid Electricity Distribution plc	Onshore Transmission Licensee
Workgroup Member	Paul Youngman	Drax	Generator

Workgroup Membership

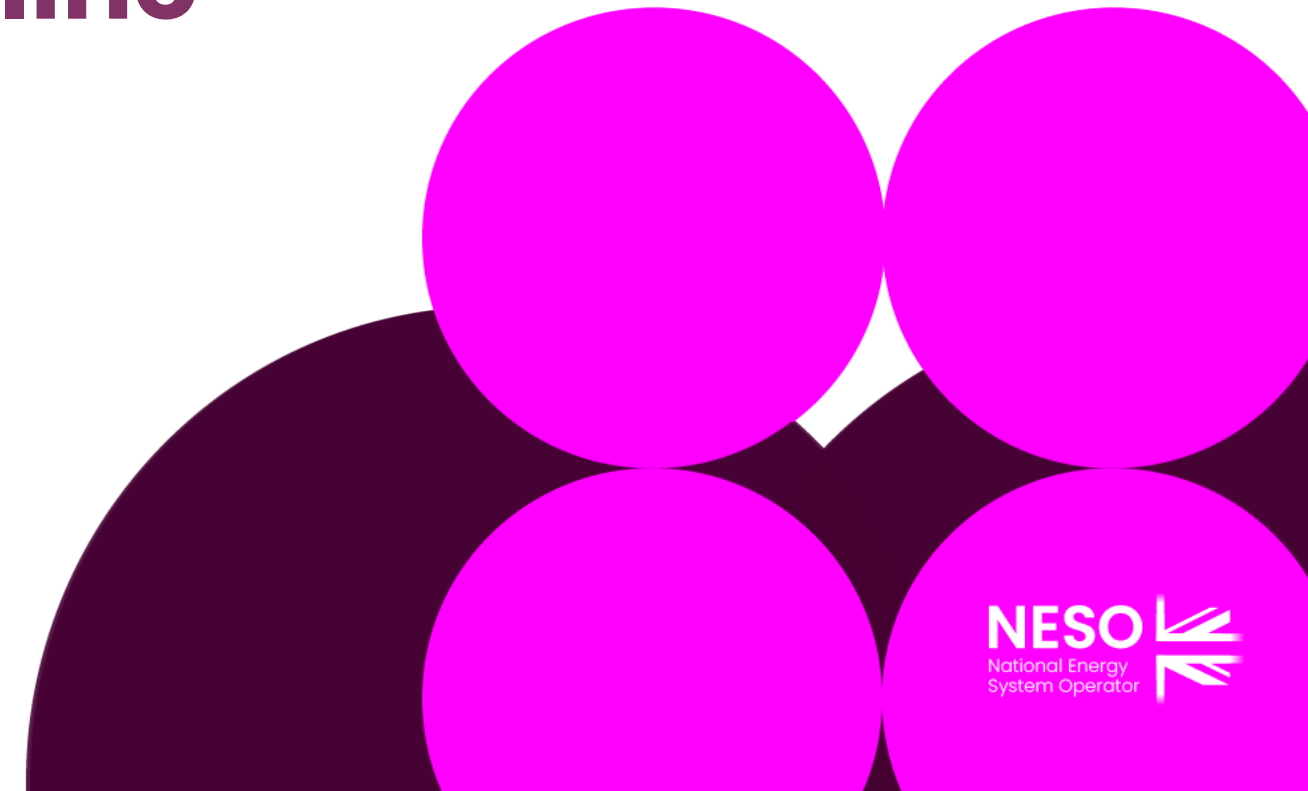
Role	Name	Company	Industry Sector
Workgroup Member	Philip Pateman	Aukera energy	Generator
Workgroup Member	Philip Patrick	Firstway energy	Bess Developer
Workgroup Member	Ravinder Shan	FRV Powertek Limited	Generator
Workgroup Member	Robin Dunne	InterGen	Generator
Workgroup Member	Rob Smith	ENSO Green Holdings Limited (EGHL)	Generator
Workgroup Member	Ross O Hare	SSEN	Network Operator
Workgroup Member	Ross Wolhuter	Eden Renewables	Developer
Workgroup Member	Sam Aitchison	Island Green Power	Generator
Workgroup Member	Sarah Lightfoot	Root-Power	Generator
Workgroup Member	Simon Wragg	Ethos Green Energy Solutions Ltd	Developer
Workgroup Member	Tom Palmer	Zenobe	Generator
Observer	Andrew Willis	Kona Energy	Generator
Observer	Barney Smeaton	Immersa	Developer
Observer	Hannah Stanley	Regen	
Observer	Hazel Starmer-Jones	BW ESS	Developer

Workgroup Membership

Role	Name	Company	Industry Sector
Observer	Kim Dawson	SPEN	Network Operator
Observer	Mark Lawrence	Conrad Energy	Generator
Observer	Olly Frankland	Electricity Storage Network	Industry Body
Observer	Bethany Garry	DESNZ	Government Observer
Authority Rep	Shabana Akhtar	Ofgem	Authority Representative

Objectives and Timeline

Claire Goult – NESO Code Administrator



Urgent Timeline

Objectives

To consider the updated Proposer's solution, alternative requests raised and alternative vote to confirm WACMs

Urgent Timeline for CMP470 as of 10 April 2026

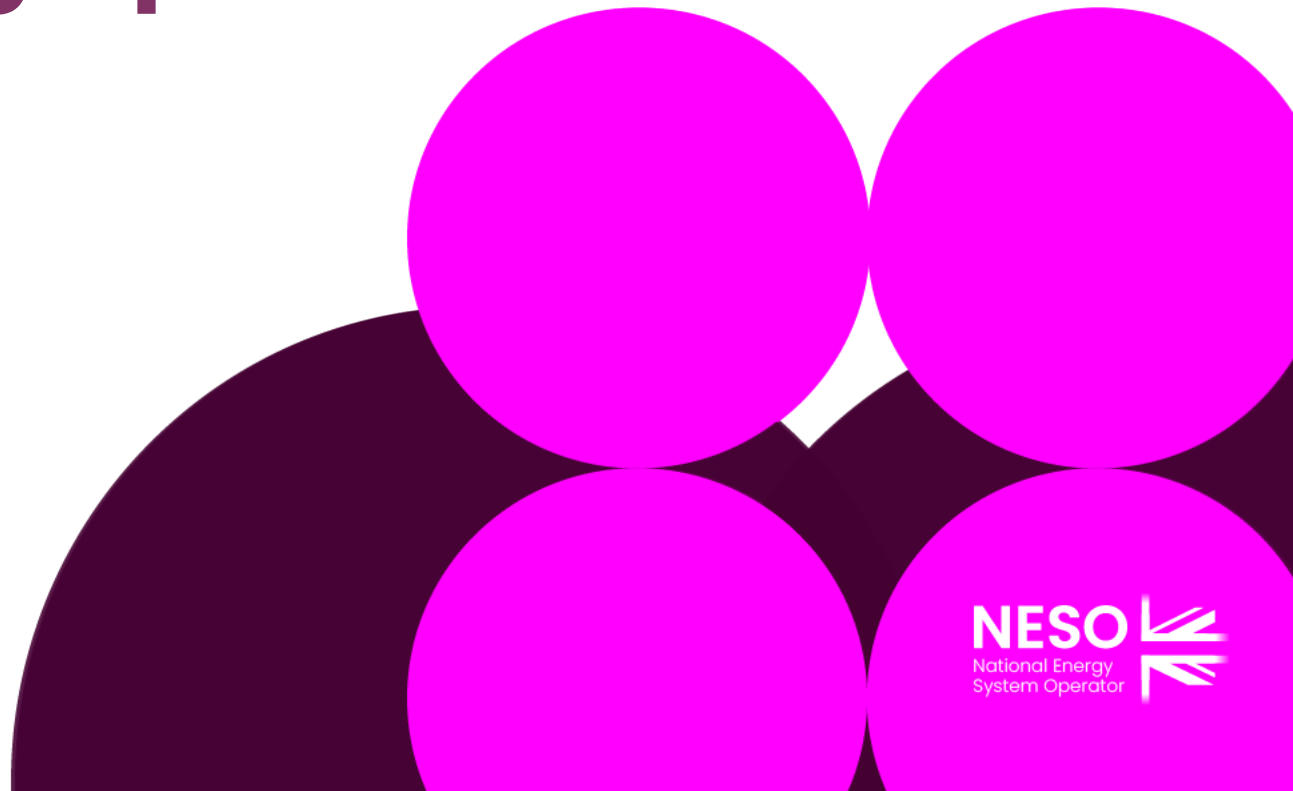
Workgroups		
Workgroup 1	10 April 2026	Proposer's presentation
Workgroup 2	14 April 2026	Solution Update/Alternatives
Workgroup 3	16 April 2026	Alternatives/Consultation questions
Workgroup 4	21 April 2026	Finalise WG Consultation
Workgroup Consultation	**24 April 2026 to 30 April 2026 (4 Business Days due to Urgency)**	
Workgroup 5	06 May 2026	Review consultation responses
Workgroup 6	12 May 2026	Alternative Discussion/Vote
Workgroup 5	14 May 2026	Review and Finalise Legal Text
Workgroup 6	19 May 2026	Finalise Report/Workgroup Vote
Post Workgroups		
Workgroup Report to Panel	**28 May 2026**	**Special Panel 5 June 2026**
Code Administrator Consultation	**08 June 2026 – 15 June 2026 (5 Business Days due to Urgency)**	
Draft Final Modification Report to Panel	18 June 2026	Panel on 26 June 2026
Final Modification Report to Ofgem	30 June 2026	Decision TBC
Implementation Date	01 January 2027	Proposers Request

NESO National Energy System Operator

Public

Action and Query Log Update

Claire Goult – NESO Code Administrator



Public

CMP470 Actions Review

Action Number	Workgroup Raised	Owner	Action	Due by	Status	Latest
03	WG1	AE/AD	Develop a graphical matrix or overview showing how commitments, liabilities, securities under CMP192, PCF under CMP448, and OTCF interact, including when each kicks in, overlaps, and their impacts	TBC	Propose to close	Proposer suggests this is complete. See update in folder.
04	WG1	AE/AD	Calculate and share a worked example of the quantum of money likely to be involved from the industry if the OTCF proposal is approved, using current queue sizes and developer portfolios	TBC	Open	Awaiting data from NESO to move forward with this one.
05	WG2	AE	Consideration of phased connections	TBC	Open	Proposer to bring suggestion to next Workgroup.
06	WG2	AE	Consult with distribution network companies to confirm whether the mechanics of the PCF can be applied to the OTCF without requiring additional code changes and update the Workgroup if this changes.	TBC	Propose to close	Proposer has engaged with DNOs. See update in folder.
07	WG2	AE	Check the terms of procurement for consultant market models to determine if they can be shared with Ofgem (confidentially) or the Workgroup and provide the names of the consultants if possible.	TBC	Propose to close	Shared in Workgroup Consultation.
08	WG2	AE/NESO	Request NESO to provide data on the number and value of cancellation charges levied in recent history and the proportion paid in full to inform the decision on whether the OTCF should be securitised in full.	TBC	Open	Proposer suggests this is an action for NESO and relates to the dataset.
09	WG2	AE/AD	Coordinate with NESO to estimate the minimum time required for implementation of the OTCF proposal after an Ofgem decision, once the solution is more defined.	TBC	Open	Action update in folder, Proposer suggests NESO talk through this at next WG.

NESO National Energy System Operator

Public

CMP470 Actions Review

Action Number	Workgroup Raised	Owner	Action	Due by	Status	Latest
10	WG2	All	Review and consider whether OTCF should apply to co-located projects where the battery element does not contribute to additional attributable works or network redesign and clarify the subset of projects to which this may apply.	TBC	Open	
12	WG4	DS	Confirm and communicate the definitive delivery date for all requested battery securities and liabilities data to the Workgroup before their first post-consultation meeting.	WG5	Open	
13	WG4	DS	Check and confirm whether any customer has ever defaulted on termination (cancellation) charges and report back to the Workgroup	WG5	Open	
14	WG4	DS	Once the necessary data is available, provide an example estimating the amount of money industry participants would contribute if the OTCF proposal is approved	TBC	Open	
15	WG4	DS	Verify if the OTCF can be applied to 2026-2027 projects with pre-Ofgem connection agreements and outline how to update their securities statements.	WG5	Open	
17	WG4	DG	Update the OTCF, CMP192, & Alternative Request 1 and 2 Comparison table for the consultation.	WG5	Open	
18	WG5	CG	Clarify whether Transmission Owners can vote on alternatives as Workgroup members.	WG6	Closed	Chair to update Workgroup members
19	WG5	AD	Write out and circulate in bullet points the detailed requirements for the analysis to be delivered to the Workgroup, ensuring alignment with members' expectations.	WG6	Open	

Public

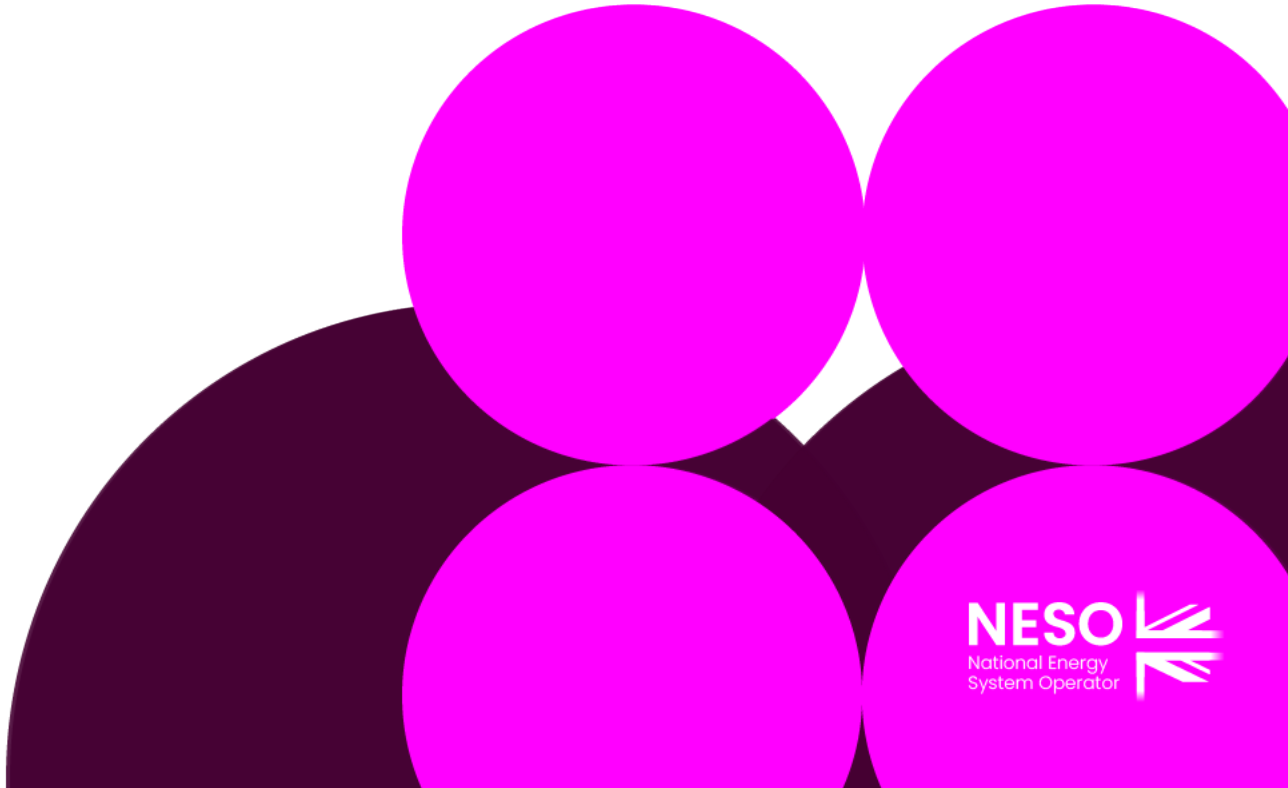
CMP470 Actions Review

Action Number	Workgroup Raised	Owner	Action	Due by	Status	Latest
20	WG5	AD	Add the outline of the analysis requirements to the actions log and ensure it is shared in a forum accessible after the meeting.	WG6	Open	
21	WG5	CG	Check and correct the accuracy of the consultation response numbers and summaries and communicate any errors or updates to the Workgroup.	WG6	Open	
22	WG5	CG	Highlight which Consultation responses provide quantitative or specific evidence and collate these into an annex for the Workgroup Report.	WG6	Closed	Chair has shared with WG members. Action to be closed after WG 6
23	WG5	CG	Obtain and circulate a definitive response from NESO, code admin, and legal regarding whether the modification impacts EBR, and include an explanation in the Workgroup Report.	WG6	Open	
24	WG5	AD	Investigate and clarify whether force majeure provisions apply to cancellation charges (including PCF and CMP192) and report back to the Workgroup.	WG6	Closed	Section 16 and Schedule 2 Exhibit 3 of the CUSC refers to force majeure in the context of connections. - NESO SME to update in Workgroup 6
25	WG5	CG/AP	Update and circulate the comparison table showing how each alternative request differs from the Original proposal, ensuring all alternatives are correctly numbered and described.	WG6	Open	Chair has circulated for Alternative Proposers (AP) to respond

NESO
National Energy System Operator

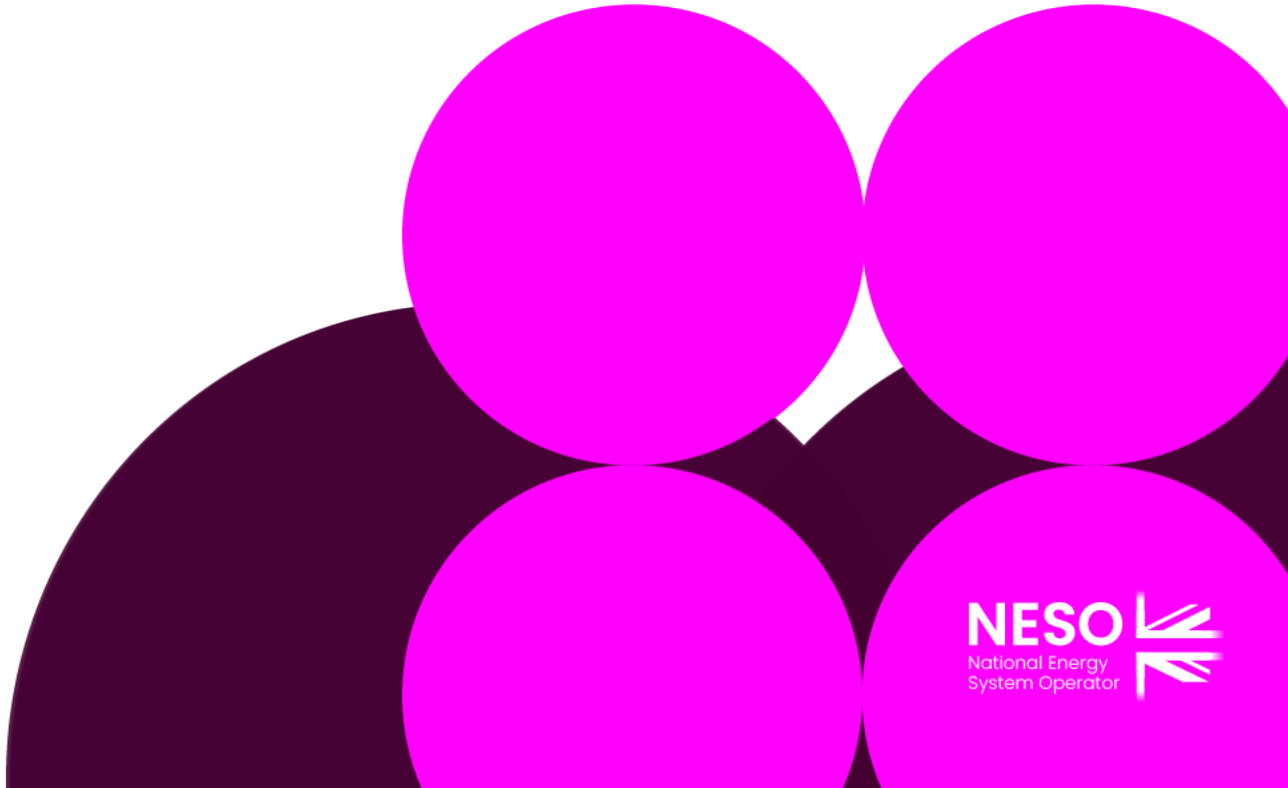
Data Discussion

ALL



Proposer's Update

Andrew Enzor – Field Energy



FIELD

Introducing an Oversubscribed Technologies Commitment Fee

CMP470 Workgroup 6

12 May 2026

Activation approach

Update based on our hypothesis that the acceptance rate of offers from the first Gated Application Window will be significantly higher than the acceptance rate in G2tWQ

Updated so that activation will be in the first MM statement after both:

- All Offers from G2tWQ have been signed or lapsed (no change)
- All first Gated Application Window applications have been assigned Gate 1 or Gate 2 status
    - i.e. **not** waiting for those offers to be signed of lapsed which is the position in the consultation
- Intended to avoid the risk of a delay to activation if there is a lengthy process to issue offers after the first Gated Application Window

Rationale:

- Workgroup gave strong feedback relative to our position in the Original proposal that it wouldn't be appropriate to assume that all Gate 2 Offers from G2tWQ will be signed
- We agree with this because it is **likely that a meaningful proportion of Gate 2 Offers from G2tWQ will not be accepted**
    - We understand there are parties wanting to cancel pre Gate 2 offer
    - There has been a long period since projects applied in G2tWQ so projects may have evolved and no longer wish to proceed
    - Projects applied with significant uncertainty on when their connection date would be. Some may decide that later connection dates make projects unattractive so decide not to sign
    - Updated securities profiles (with or without the OTCF) may prevent some customers from signing Gate 2 Offers
    - We understand that customers have received connection offers with significantly inflated connection costs

Activation approach

Update based on our hypothesis that the acceptance rate of offers from the first Gated Application Window will be significantly higher than the acceptance rate in G2tWQ

- However, projects applying into the first Gated Application Window will have more certainty:
    - The TEC register will likely have been updated before they apply so they will be able to better predict the connection date they will be offered
    - There will be a shorter period between application and offer (~6 months, not ~18 months for final G2tWQ offers)
- So it is less likely that projects receiving Gate 2 Offers from the first window will not accept those offers – in most cases if they did not intend to accept they would simply not apply
- So it is appropriate to calculate oversubscription for the purpose of activating the OTCF on the assumption that all Gate 2 Offers from the first Gated Application Window do go on to be signed
- As a result, it is not necessary to hold implementation until after Gate 2 Offers from the first Gated Application Window have been signed. NESO assigning Gate 1 or Gate 2 to all applicants is enough
- July 2027 MM statements remains the first possible activation window, which allows time for developers who do not intend to construct projects to transact
- The mechanics of the increments in the Original mean the likely impact of this will be to reduce the change of an increment from £3k/MW to £5k/MW six months after activation:
    - If anything, oversubscription will be slightly overstated when activated, on the assumption that all first Gated Application Window offers will be signed – in reality some may not…
    - …so those which do not sign would increase the percentage reduction in oversubscription between activation and the first potential increment, reducing the likelihood of an increase

Application to staged connections

Response to an action in the query log

- Suggest simple application of the OTCF to staged connections for MW not yet energised (i.e. still in the queue)
- Worked example:
    - Stage 1: 100MW, 2029 connection date
    - Stage 2: 200MW total (100MW addition), 2032 connection date
- OTCF applies to the full 200MW (all of which is in the queue) from activation to energisation of the first 100MW in 2029
- From energisation of the first 100MW in 2029, the OTCF would continue to apply to the remaining 100MW until energisation in 2032

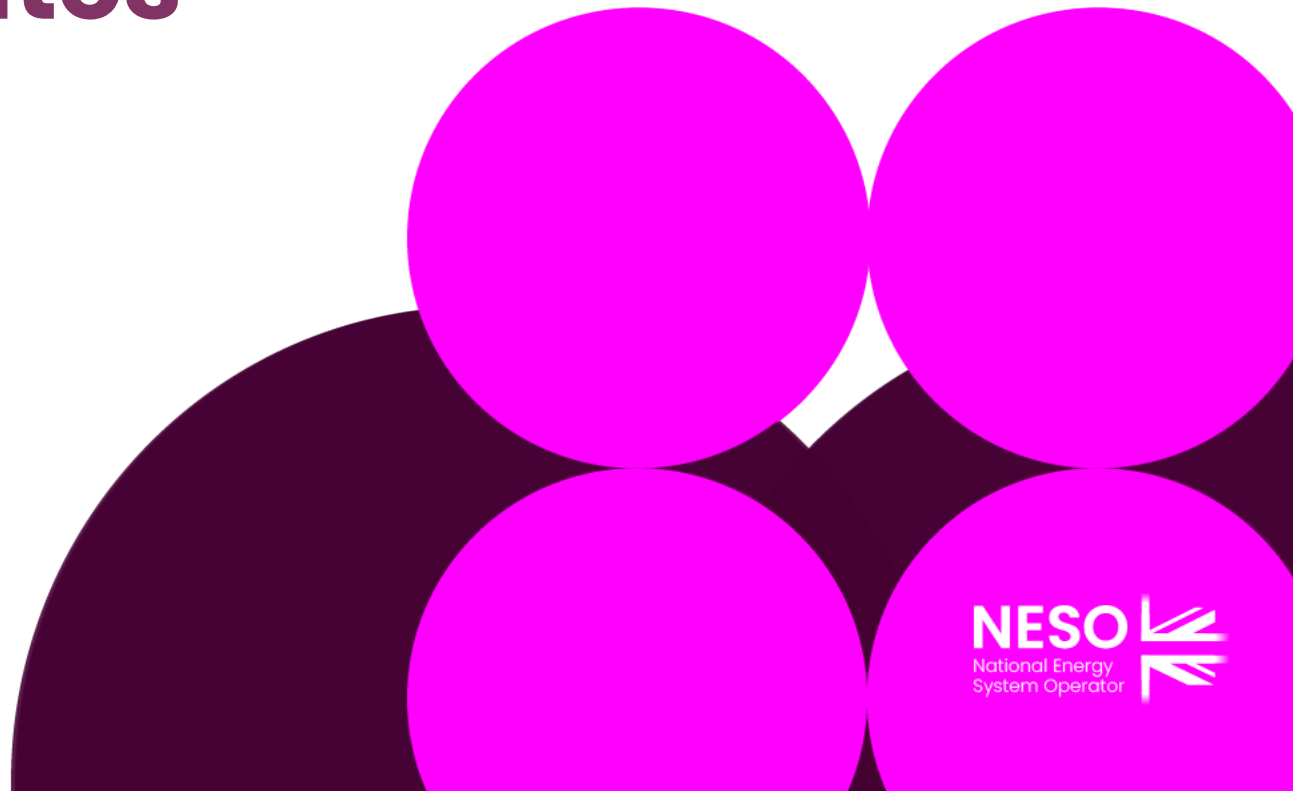
For discussion: we are intending to implement a carve-out for co-located projects where the addition of BESS has no attributable works or connection costs. Should we apply the same to the second stage of a staged connection if it has very little network impact?

Key design parameters – summary

Design parameter	As presented in proposal
Activation and deactivation thresholds	• Activated at 50% oversubscription and national capacity target >5GW • Deactivated at 25% oversubscription
National or regional application	National
Timing	Start: • For G2tWQ offers - from activation • For new Gate 2 Offers thereafter, from acceptance of offer End: energisation.
Application method	Floor to securities
Level of the securities floor	£3k/MW initially. Increasing if oversubscription falls by less than 25%, to £5k/MW initially and then in £5k/MW increments up to a cap of £25k/MW
Application to co-located projects	Applies to projects which include the oversubscribed technology based on the lower of TEC and installed capacity of the oversubscribed technology except where both: • The oversubscribed technology is due to connect after the other technology; and • The addition of the oversubscribed technology has no attributable works or connection costs
Interaction with the PCF	Applies on top of PCF but as floor to total securities (including PCF), so if securities with PCF are already above floor, OTCF has no impact
Treatment of OTCF collections	Returned to consumers via TNUoS
Option for NESO to implement or not (with Ofgem overrule)	Yes, with Ofgem option to overrule
Implementation and activation approach	Implemented into CUSC soon after Ofgem decision Activated in the first biannual securities statement after both: • All offers from G2tWQ have either been signed or lapsed • All applicants to the first Gated Application Window have been assigned Gate 1 or Gate 2 status

Alternative Requests Discussion and Updates

Claire Goult – NESO Code Administrator



Proposed Alternative Requests

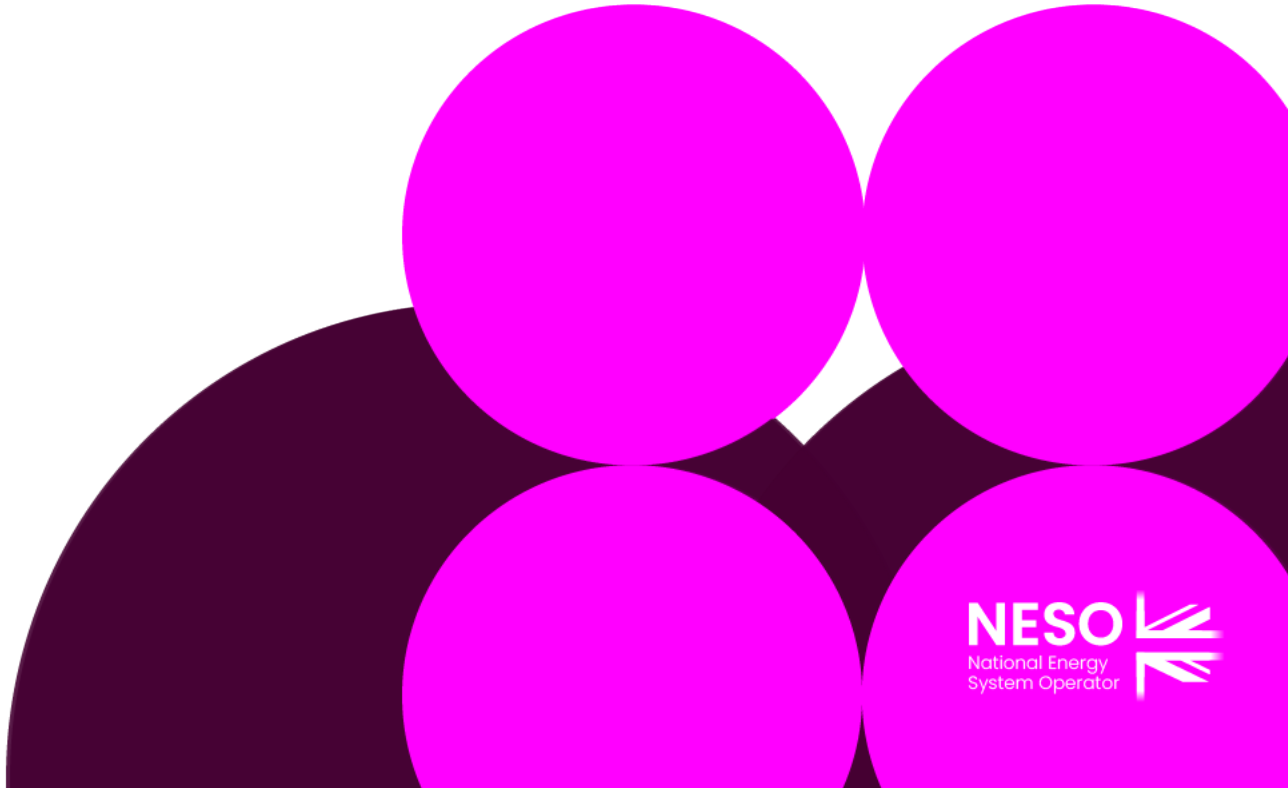
1. Alternative Implementation Date Root Power – Sarah Lightfoot & Neil Brooks	Proposes to delay the start date (the point at which the fee becomes payable) in the following manner: •For Gate 2 to Whole Queue (G2TWQ) offers: Delay to March 2028, 1 year from final issuing of Gate 2 offers. •For New Gate 2 Offers thereafter: Delay to 1 year from acceptance of Gate 2 offer.
2. Alternative Fixed One-Off Security Firstway Energy – Nathan Stevenson	1. Single one off payment applicable to all Gate 2 BESS projects regardless of being in the oversubscribed queue; 2. Capped at £1.5k/MW applicable to all Gate 2 projects regardless of being in the oversubscribed queue; 3. The fee becomes payable 9 months from acceptance of Gate 2 grid offer, applicable to all projects; and 4. Fully refundable on energisation
3. The Exit Auction Mechanism Windline (Cairnbeg) Ltd – Lloyd Garvie (Noted not a CUSC party and therefore must be adopted by a Workgroup member)	Instead of a "punish-to-thin" approach, NESO should facilitate an Exit Auction to reduce over capacity in particular technologies. This would allow for a more efficient reallocation of capacity: 1. Voluntary Exit: Developers could bid a "strike price" to vacate their position. 2. Least Cost to Consumer: By paying developers to exit, NESO ensures that only those who value their connection the least (i.e., the least viable projects) leave the queue first. 3. Preservation of Investment Signal: This treats capacity as a valuable asset and respects the development spend already committed by the industry, maintaining the UK's reputation as a stable environment for energy investment.

Proposed Alternative Requests

4. Minor changes in how the OTCF value increments after activation Lightsource bp – Grahame Neale	• <25% oversubscription – OTCF increments downwards towards £0/MW (e.g. £5k/MW to £3k/MW). • 25% to 50% oversubscription – OTCF value is unchanged. • >50% oversubscription – OTCF increments upwards towards the maximum (e.g. £5k/MW to £10k/MW). This is unchanged from the Original
5. OTCF Cap and Floor OnPath Energy – Lee Wilkinson	This alternative would cap the OTCF at a value equal to the maximum-security liability a project would be required to post at any point ahead of the energisation date. The OTCF would ramp up at the same rate as in the Original Proposal, with the same frequency. However, on a project-by-project basis the OTCF would be capped at a set value according to each project's security liability profile.
6. Queue Management milestone M8 (Project Construction) Zenobe – Tom Palmer	The only difference to the Proposers solutions is that the Oversubscribed Technology Commitment Fee (OTCF) will be disapplied to projects where they have met Queue Management Milestone M8 (Project Construction).

Workgroup Alternative Vote

Claire Goult – NESO Code Administrator



What is the Alternative Request?

What is an Alternative Request? The formal starting point for a Workgroup Alternative Modification to be developed which can be raised up until the Workgroup Vote.

What do I need to include in my Alternative Request form? The requirements are the same for a Modification Proposal you need to articulate in writing:
- a description (in reasonable but not excessive detail) of the issue or defect which the proposal seeks to address compared to the current proposed solution(s);
- the reasons why the you believe that the proposed alternative request would better facilitate the Applicable Objectives compared with the current proposed solution(s) together with background information;
- where possible, an indication of those parts of the Code which would need amending in order to give effect to (and/or would otherwise be affected by) the proposed alterative request and an indication of the impacts of those amendments or effects; and
- where possible, an indication of the impact of the proposed alterative request on relevant computer systems and processes.

How do Alternative Requests become formal Workgroup Alternative Modifications? The Workgroup will carry out a Vote on Alternatives Requests. If the majority of the Workgroup members or the Workgroup Chair believe the Alternative Request will better facilitate the Applicable Objectives than the current proposed Original solution, the Workgroup will develop it as a Workgroup Alternative Modification.

Who develops the legal text for Workgroup Alternative Modifications? NESO will assist Proposers and Workgroups with the production of draft legal text once a clear solution has been developed to support discussion and understanding of the Workgroup Alternative Modifications.

NESO
National Energy System Operator

Can I vote? And What is the Alternative Vote?

To participate in any votes, Workgroup members need to have attended at least 50% of meetings. The vote shall be decided LIVE by simple majority of those present at the meeting at which the vote takes place (whether in person or by teleconference)

Stage 1 – Alternative Vote

- Vote on whether Workgroup Alternative Requests should become Workgroup Alternative CUSC Modifications.

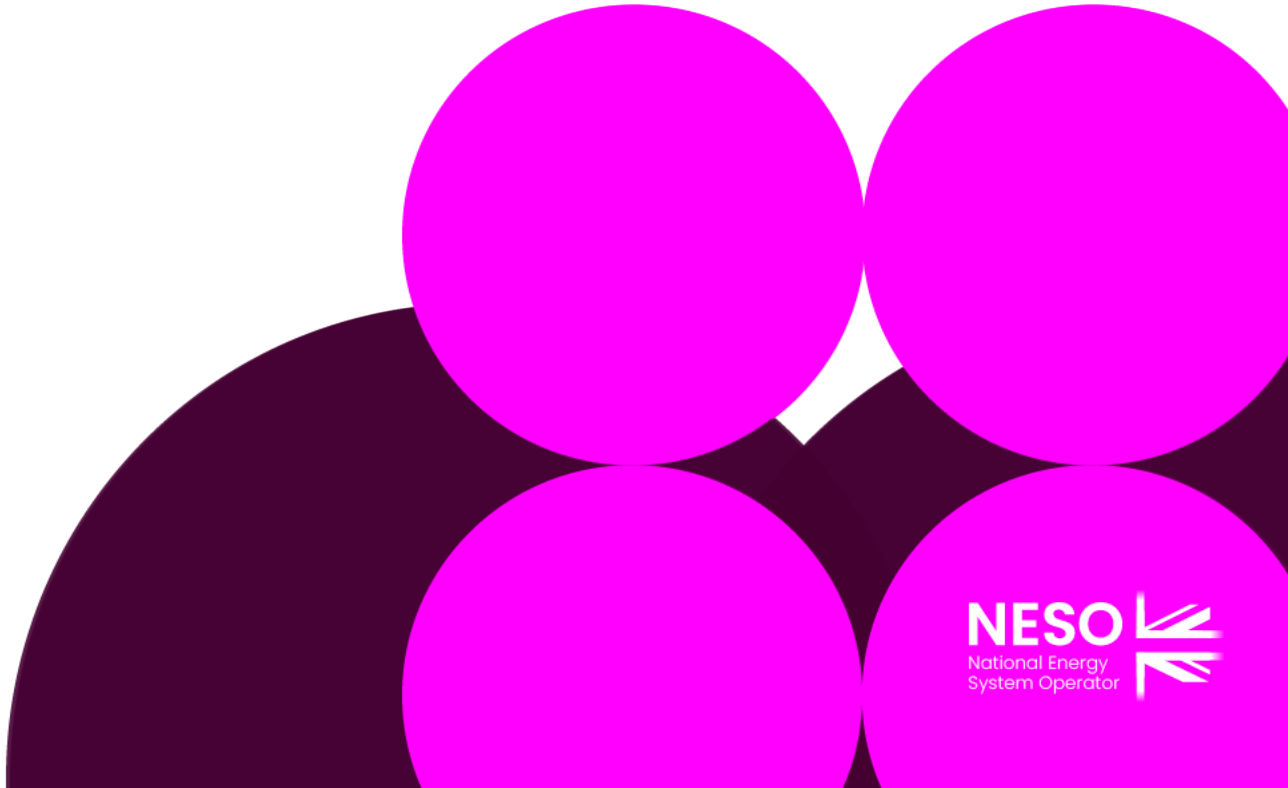
- The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.

- **Should the majority of the Workgroup OR the Chair believe that the potential alternative solution may better facilitate the CUSC objectives than the Original then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative CUSC modification (WACM)** and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.

NESO National Energy System Operator

Timeline Extension Discussion

Claire Goult – NESO Code Administrator



Urgent Timeline

Objectives

To consider the updated Proposer's solution, alternative requests raised and alternative vote to confirm WACMs

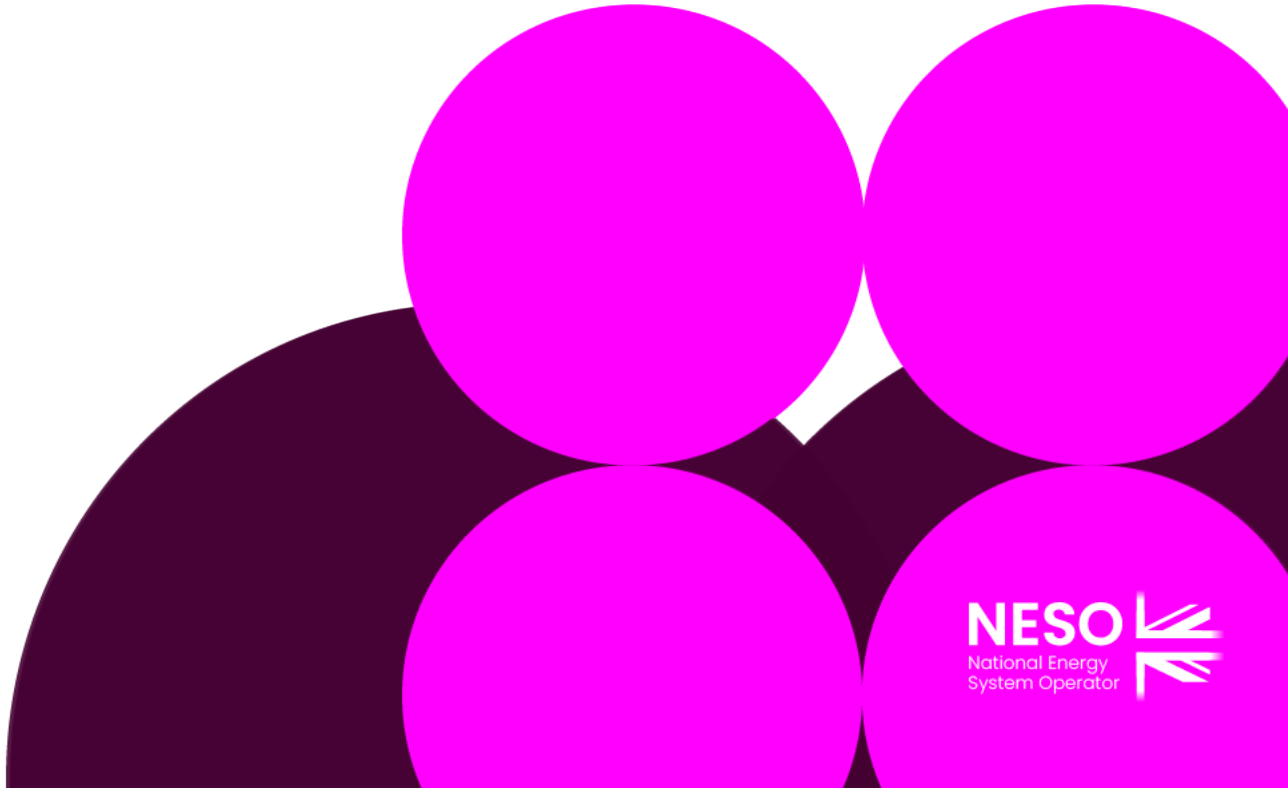
Urgent Timeline for CMP470 as of 10 April 2026

Workgroups		
Workgroup 1	10 April 2026	Proposer's presentation
Workgroup 2	14 April 2026	Solution Update/Alternatives
Workgroup 3	16 April 2026	Alternatives/Consultation questions
Workgroup 4	21 April 2026	Finalise WG Consultation
Workgroup Consultation	**24 April 2026 to 30 April 2026 (4 Business Days due to Urgency)**	
Workgroup 5	06 May 2026	Review consultation responses
Workgroup 6	12 May 2026	Alternative Discussion/Vote
Workgroup 5	14 May 2026	Review and Finalise Legal Text
Workgroup 6	19 May 2026	Finalise Report/Workgroup Vote
Post Workgroups		
Workgroup Report to Panel	**28 May 2026**	**Special Panel 5 June 2026**
Code Administrator Consultation	**08 June 2026 – 15 June 2026 (5 Business Days due to Urgency)**	
Draft Final Modification Report to Panel	18 June 2026	Panel on 26 June 2026
Final Modification Report to Ofgem	30 June 2026	Decision TBC
Implementation Date	01 January 2027	Proposers Request

NESO National Energy System Operator

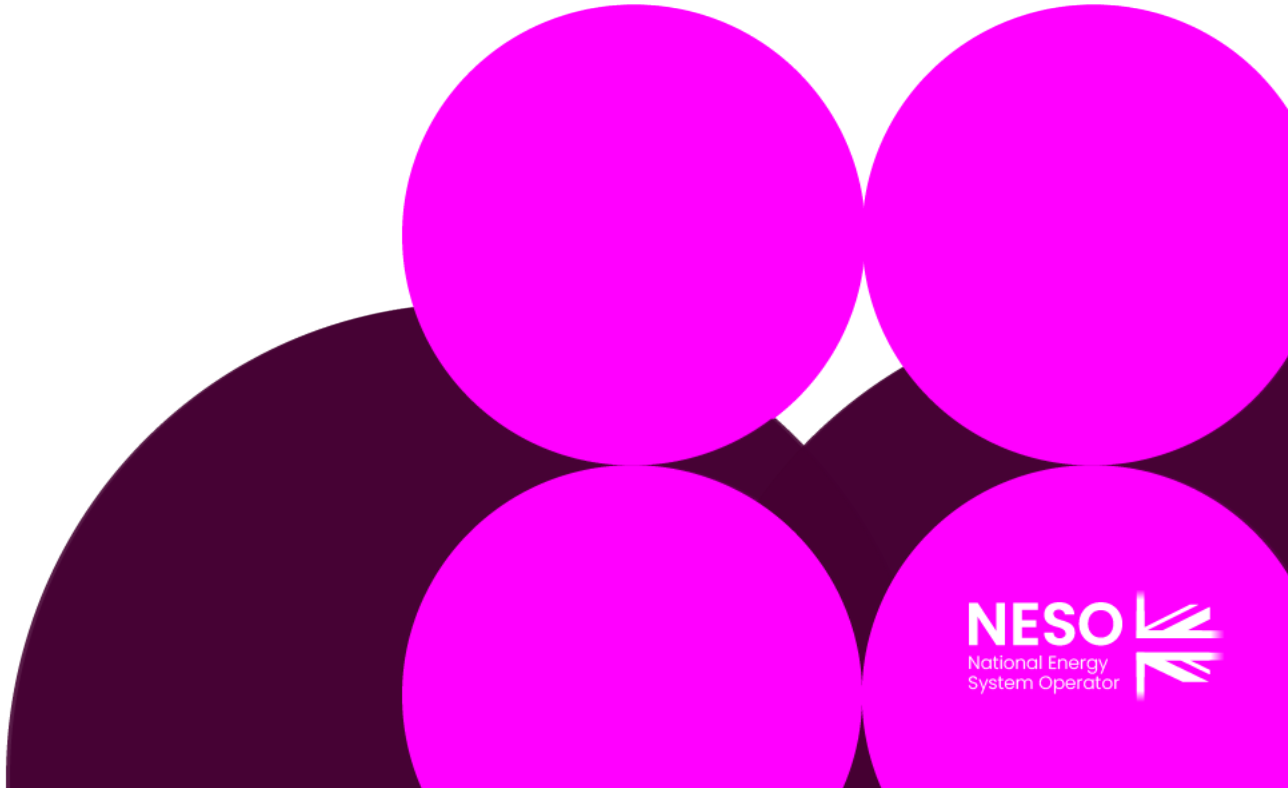
Any Other Business

Claire Goult – NESO Code Administrator

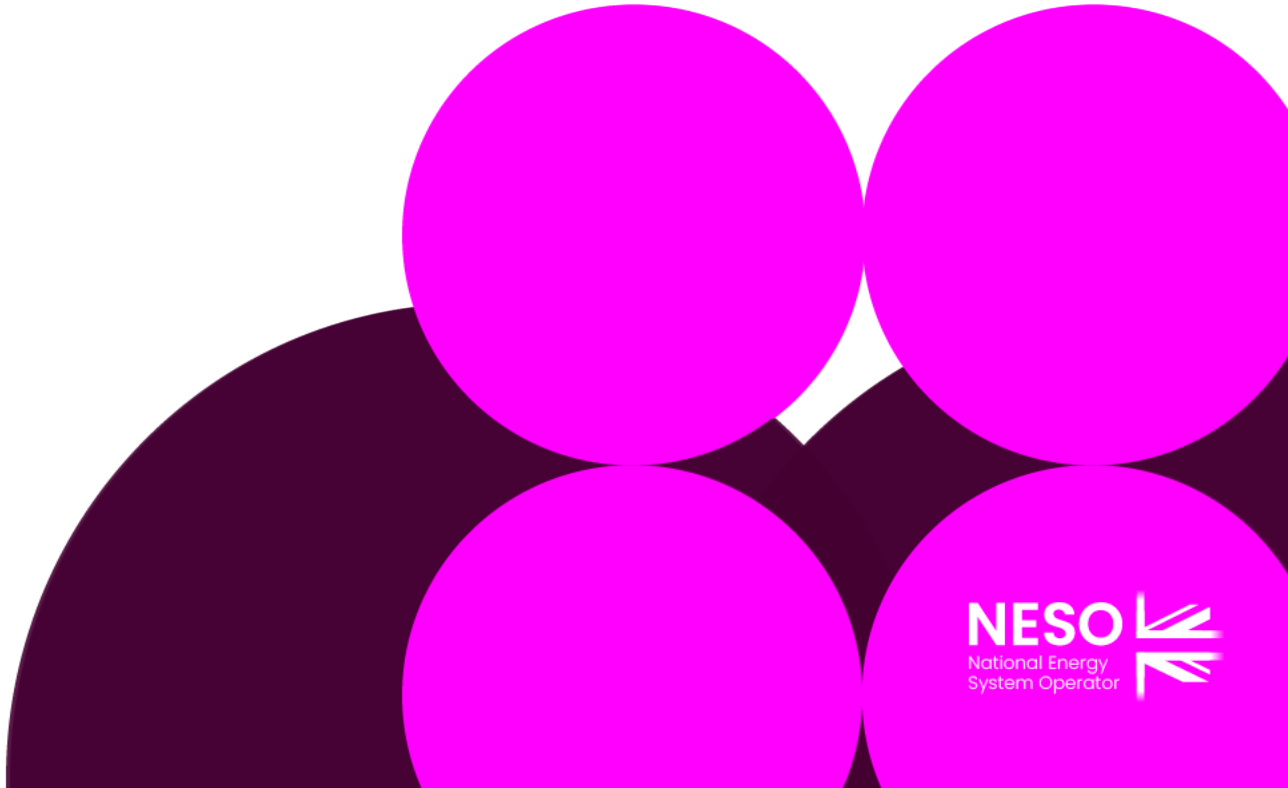


Next Steps

Claire Goult – NESO Code Administrator



Appendix



Terms of Reference

a) Consider EBR implications.
b) Consider the scope of work identified and whether this is achievable within the timeframe outlined in the Ofgem Urgency decision letter.
c) Consider how the de-activation process would work
d) Consider to whom any funds arising would be paid to, and how, if the OTCF was realised (for relevant projects).
e) Consider how the co-location process would be applied where one technology is oversubscribed and the other not.
f) Consider how the co-location process would be applied where both technologies are oversubscribed, but one technology was ahead of the other (so the £/MW level is at a different quantum).
g) Consider whether the targeted fee facilitates competition by assessing to what extent overall project viability (and hence cost of risk of incurring the fee) is related to economic competitiveness should a project become viable.
h) Consider whether the increased costs to Generators will be offset by the benefits in network planning resulting in a net benefit.
i) Consider whether the solution/s will bring the connection queue closer to the strategic capacity set out in CP30.

Alternative Requests and Workgroup Membership

Clarification on TO Workgroup Membership following liaison with Ofgem

CUSC 8.20.3 states that:

*A Workgroup **shall comprise at least five (5) persons (who may be Panel Members) selected by the CUSC Modifications Panel** from those **nominated by CUSC Parties, BSC Parties, the Citizens Advice or the Citizens Advice Scotland** for their **relevant experience and/or expertise in the areas forming the subject-matter** of the CUSC Modification Proposal(s) to be considered by such Workgroup (and the CUSC Modifications Panel shall ensure, as far as possible, that an **appropriate cross-section of representation, experience and expertise is represented** on such Workgroup) provided that there shall always be at least one member representing The Company and the CUSC Modifications Panel is of the view that if and only if a CUSC Modification Proposal is likely to have an impact on the **STC, the CUSC Modifications Panel may invite the STC committee to appoint a representative to become a member of the Workgroup**. A representative of the Authority may attend any meeting of a Workgroup as an observer and may speak at such meeting.*

Nomination of non-Schedule 1 organisations

- As NESO is a Party to both the CUSC (as the counterparty to Schedule 1 Users) and the BSC, **it is permissible for NESO to nominate TOs as a Workgroup member** if they have **relevant experience for a modification.** TO's must request this from NESO ahead of workgroups.
- TOs may also wish to seek a **nomination from the STC Panel**, ask to be designated as a **Materially Affected Party by Ofgem**, or to participate in this Workgroup as an **Observer.**
- TO members may be part of the CMP470 modification as workgroup members due to their relevant expertise in the connections space.

Alternative Requests

- 8.20.16 Any CUSC Party, BSC Party, the Citizens Advice or the Citizens Advice Scotland may (subject to Paragraph 8.20.20) raise a Workgroup Consultation Alternative Request in response to the Workgroup Consultation.
- TOs, **regardless of Workgroup member status, cannot raise an alternative as they are not a CUSC/BSC Party**, but other Workgroup members may wish to raise any ideas expressed by a TO as an alternative following workgroup discussion.