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## Code Administrator 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 **27 May 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>	Steve.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)	<input checked="" type="checkbox"/> <b>Non-Confidential</b> ( <i>this <u>will be shared</u> with industry and the Panel for further consideration</i> )
	<input type="checkbox"/> <b>Confidential</b> ( <i>this will be disclosed to the Authority in full but, unless specified, <u>will not be shared</u> with the Panel or the industry for further consideration</i> )

**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;*

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- 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*
- 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 Code Administrator Consultation questions				
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives against the current baseline.	<p>Mark the Objectives which you believe the proposed solution better facilitates than the current baseline:</p> <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 checked="" type="checkbox"/>f <input type="checkbox"/>g  <input type="checkbox"/>None </td> </tr> </table> <p>Improves consistency of liability allocation and fairness across users (including demand), supporting a more efficient and coordinated system operation.</p>	Original	<input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d <input type="checkbox"/> e <input checked="" type="checkbox"/> f <input type="checkbox"/> g <input type="checkbox"/> None
Original	<input type="checkbox"/> a <input type="checkbox"/> b <input type="checkbox"/> c <input checked="" type="checkbox"/> d <input type="checkbox"/> e <input checked="" type="checkbox"/> f <input type="checkbox"/> g <input type="checkbox"/> None			
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/>Original</p> <p><input type="checkbox"/>Baseline</p> <p><input type="checkbox"/>No preference</p> <p>It is:</p> <ul style="list-style-type: none"> <li>purely consequential to CMP417</li> </ul>		

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		<ul style="list-style-type: none"> <li>already aligned with CUSC intent</li> </ul> <p>No viable alternative improves alignment without:</p> <ul style="list-style-type: none"> <li>adding complexity or divergence</li> </ul>
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No
		Without CM093, there is a material risk of inconsistent interpretation and application across CUSC and STC frameworks, particularly at the point of CMP417 implementation.
4	Do you have any other comments?	<p>Need to ensure:</p> <ul style="list-style-type: none"> <li>alignment with CUSC definitions (e.g. Attributable Works)</li> </ul> <p>Avoid:</p> <ul style="list-style-type: none"> <li>unintended divergence between STC drafting and CUSC constructs (e.g. use of “as defined in CUSC”)</li> </ul> <p>Ensure clarity for:</p> <ul style="list-style-type: none"> <li>demand and hybrid site treatment</li> </ul>