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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 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

Respondent details	Please enter your details	
Respondent name:	Harriet Eckweiler	
Company name:	SSE Transmission	
Email address:	Harriet.Eckweiler@sse.com	
Phone number:	N/A	
Which best describes your organisation?	<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 type="checkbox"/> System Operator <input checked="" type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

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(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*
- 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

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1	Do you believe that the Original Proposal better facilitates the Applicable Objectives versus the current baseline?	<p>Mark the Objectives which you believe the Original Solution better facilitates than the current baseline:</p> <table border="1"> <tr> <td data-bbox="617 555 866 680">Original</td><td data-bbox="866 555 1415 680"> <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"/>h <input type="checkbox"/>none </td></tr> </table> <p>We agree that the original proposal could better facilitate the applicable objectives than the current baseline. The proposal supports the goal of equitable treatment for all users when calculating securities and liabilities.</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"/> h <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"/> h <input type="checkbox"/> none			
2	Do you support the proposed implementation approach?	<p><input type="checkbox"/>Yes</p> <p><input checked="" type="checkbox"/>No</p> <p>We require a minimum of 2 months from approval date to provide the data NESO requires and update the TO Construction Agreements. Therefore 10 days from approval of the modification for the implementation will not be sufficient for us to do the studies and send the data to NESO. We suggest that the implementation period accounts for the time TOs require to make the changes in relation to the next securities/liabilities data submission deadline.</p>		
3	Do you have any other comments?	Click or tap here to enter text.		
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/>Yes (the request form can be found in the Workgroup Consultation Section)</p> <p><input checked="" type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>		

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5	Does the draft legal text satisfy the intent of the modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<p>Further amendments to the STC will be required as noted in the workgroup consultation report. Further discussions are required of what these changes are and when they will be made if CMP417 is to be approved in early Autumn.</p>

Specific Workgroup Consultation questions

6	Do any specific parts of the solution require additional clarification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>Further clarification is required on how hybrid sites will be handled if there is a cancellation of the site that has the lesser capacity (e.g. Demand 500MW/Generation 250MW). Since the higher MW (in the example above the Demand scheme) is the one that is used for calculating the securities and liabilities, what happens if the lesser scheme (Generation) is removed and there are attributable works already undertaken?</p>