

Proposer response to CAC consultation of CMP 472: Large Embedded Generators (LEGs) Original Red Line Boundary (ORLB) Sharing Without Customer Consent

Overview: This proposal seeks to introduce a new clause in Section 17 of the CUSC to permit NESO to share the Original Red Line Boundary (ORLB) submitted by Large Embedded Generators (LEGs) with the relevant DNOs without requiring explicit customer consent.

Feedback summary : Theme	Potential conflict between CMP 472 legal texts and existing BEGA/BELLA application form	ORLB file sharing timescale	Define the sharing timescale via Service Level Agreement	Can customers submit a new/updated ORLB alongside non-gated modification application	ORLB file format	Inclusion of Point of Supply in ORLB file
Proposer response	- LEGs are required to submit ORLB evidence through the Readiness Declaration application form, rather than via the BEGA/BELLA application process. - If CMP 472 is implemented, the Readiness Declaration application form will state that by making the application LEGs are deemed to have consented to the ORLB data being automatically shared with the relevant DNO in accordance with CUSC 17.7.3.3	Upon agreement with DNOs, to publish the timescale via relevant NESO guidance in Original Red Line Boundary guidance and Customer Readiness Declaration Handbook	A solution is currently being developed and will be communicated to, and agreed with, DNOs in due course, ahead of the next Connections Application Window and as part of WS1b discussions.	- ORLB amends will form part of the Gated Mod app process - On-going compliance of an RLB is part of existing compliance processes between either DNOs and Embedded Generator or between NESO and Directly Connected	Information is already covered in NESO ORLB guidance	
Action timeline	- Approval before the next window opens: processed in the next window. - Approval after the next window opens: processed in the following window.	Guidance publication (six weeks before next window opens)	Before the next connections application window opens	n/a	ORLB guidance publication (six weeks before next window opens)	