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Final Modification Report		
CMP472: Large Embedded Generators Original Red Line Boundary Sharing Without Customer Consent Overview: This proposal seeks to introduce a new clause in Section 17 of the Connection and Use of System Code (CUSC) to permit the National Energy System Operator (NESO) to share the Original Red Line Boundary (ORLB) submitted by Large Embedded Generators (LEGs) with the relevant Distribution Network Operators (DNOs) without requiring explicit customer consent.	Modification process & timetable 1 2 3 4 5 Proposal Form 09 April 2026 Code Administrator Consultation 27 April 2026 – 19 May 2026 Draft Final Modification Report 20 August 2026 Final Modification Report 11 September 2026 Implementation 10 BD following Authority Decision	
	Have 5 minutes? Read our Executive summary Have 60 minutes? Read the full Final Modification Report Have 120 minutes? Read the full Final Modification Report and Annexes.	
	Status summary: This report has been submitted to the Authority for them to decide whether this change should happen.	
	Panel Recommendation: The Panel has recommended unanimously that the Proposer’s solution better facilitate the CUSC Applicable Objectives.	
	This modification is expected to have a: Low impact on Large Embedded Generators	
Governance route	Standard Governance modification to proceed to Code Administrator Consultation	
Who can I talk to about the change?	Proposer: Muki Liu Muki.liu@neso.energy 07709840676	Code Administrator Contact: lurrentia.walker@neso.energy

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What is the issue?

Under Connection and Use of System Code (CUSC) 17.7.3.1, Large Embedded Generators (LEGs) applying for a Gate 2 offer must submit their Original Red Line Boundary (ORLB) to National Energy System Operator (NESO). While Distribution Network Operators (DNOs) remain responsible for distribution-side connection compliance and contract validity, they do not automatically receive the ORLB information submitted to NESO.

At present, NESO may only share ORLB data with DNOs where customer consent has been provided. Where consent is not given, this creates a structure gap whereby DNOs are unable to:

- verify whether the ORLB submitted to NESO aligns with their distribution records; or
- confirm whether any changes to the ORLB remain within allowable limits under the Distribution Connection Agreement.

This creates a material risk that projects with invalid or non-compliant distribution contracts could continue through the Gate 2 process. As a result, the LEGs or DNOs would only become aware of non-compliant distribution contracts at a later stage—through contract issuance and DNO studies. This will create inefficiency and avoidable waste in the process.

Why change?

For LEGs to be eligible for a Gate 2 offer, they must hold a valid Distribution Connection Agreement. DNOs are therefore required to assess ORLB data to confirm:

- consistency between the ORLB held by the DNO and the ORLB submitted to NESO; and
- that any ORLB changes proposed by the applicant remain within allowable limits.

However, under the current CUSC framework, where customer consent is withheld:

- DNOs cannot complete these checks;
- NESO may progress projects that ultimately fail distribution compliance; and
- Significant network design, assessment, and queue management effort may be undertaken unnecessarily.

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This creates:

- unfair and inconsistent treatment between applicants;
- inefficiency in the gated design process; and
- avoidable diversion of NESO, Transmission Owners (TOs), and DNO resources.

Early identification of ORLB inconsistencies allows ineligible projects to be removed from the Gate 2 process before queue formation, ensuring capacity and resource are directed toward projects that are ready and compliant.

Benefits and impacts of the proposal

This modification proposal is expected to have a low impact on LEGs. It would apply only to future connections and would have no impact on projects that are already connected.

In addition, the introduction of permitted capacity requirements for generation means that the number of LEGs able to apply for a Gate 2 offer under the capacity allowance by technology would be lower than under the Gate 2 to Whole Queue Process, under which 239 LEGs secured Gate 2 offers.

The proposal is expected to have a positive impact on NESO, TOs and DNOs, namely:

- Efficiency and resource optimisation
 1. Enables early removal of projects holding invalid distribution contracts, avoiding unnecessary network design and assessment work.
 2. Allows NESO and TOs to better forecast and allocate resources during and after application window closure.
- Fairness and consistency
 1. Ensures equal treatment of transmission-connected and embedded applicants.
 2. Prevents compliant distribution customers from being disadvantaged by projects that cannot ultimately connect.
- Queue confidence and system planning
 1. Supports a more accurate and robust gated design process.
 2. Enables a clearer view of deliverable capacity aligned with Clean Power 2030 objectives.
- Legal clarity and dispute avoidance

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1. Explicitly codifying ORLB data sharing in the legally binding CUSC reduces ambiguity and limits the potential for customer dispute.
2. Avoids avoidable regulatory and legal resource diversion for NESO and industry parties.
 - Contribution to fair and effective market competition
1. Sharing LEG ORLB data is essential to ensuring that only Gate 2-compliant projects progress, enabling effective delivery of Connections Reform and supporting fair and effective competition in electricity generation and supply.

April Transmission Charging Methodologies Forum (TCMF) Feedback and the Proposer's response

1. Why CUSC is the appropriate vehicle

At the April TCME, feedback from industry participants suggested alternative routes for this modification proposal. The following alternative solutions were considered but discounted.

- Connections application forms cannot create legally binding data-sharing rights and would make ORLB sharing voluntary, undermining consistency.
- The Grid Code is not the appropriate instrument for governing gated application data requirements, which are set out in CUSC Section 17.
- Technical data submission documents do not have contractual force and cannot override the consent requirements implied under the current CUSC drafting.

A CUSC modification is therefore the only mechanism that can provide the necessary legal clarity and enforceability.

2. Overall feedback

April TCMF members were supportive of the proposal, with explicit industry support for NESO sharing ORLB data with the relevant DNOs.

While commercial sensitivity of customer data has been raised in other modification workstreams, ORLB information remains confidential and subject to appropriate data-handling controls by both NESO and DNOs. The proposed sharing of LEG ORLB data is proportionate, necessary, and limited to enabling Gate 2 compliance checks.

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What is the Proposer's solution?

Introduce a new clause in CUSC Section 17 to explicitly permit NESO to share ORLB data submitted by LEGs with the relevant DNOs without requiring customer consent, solely for the purpose of verifying ongoing distribution contract compliance.

Legal text

CUSC 17.7.3.3

The Original Red Line Boundary submitted by a Large Embedded Power Station as part of a Gate 2 Application or Gated Modification Application shall be shared by the Company with the relevant Distribution Network Operator for the purpose of verifying continued compliance with Distribution system connection requirements.

What is the impact of this change?

Proposer's assessment against CUSC Connection Charging Objectives	
Relevant Objective	Identified impact
(a) means the Use of System Charging Objectives, as if references therein to the Use of System Charging Methodology were to the Connection Charging Methodology and in addition, the objective (where consistent with the other objectives) of facilitating competition in the carrying out of works for connection to the National Electricity Transmission System.	Neutral

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*;	Positive The proposal improves NESO's ability to discharge its obligations efficiently by ensuring only

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	Gate-compliant projects progress through the connections process. This supports a more coordinated, economic, and efficient transmission system, reducing unnecessary network build and costs ultimately borne by consumers.
(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;	Positive By ensuring scarce network capacity is allocated only to projects that meet Gate 2 and distribution compliance requirements, the modification promotes fair competition and reduces speculative queue occupancy, increasing confidence for investors and delivery-ready projects.
(iii) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency **; and	Neutral
(iv) Promoting efficiency in the implementation and administration of the CUSC arrangements.	Positive The proposal directly supports the efficient administration of CUSC arrangements by

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	reducing avoidable work, streamlining the gated design process, and focusing NESO and TO effort on projects most progressed and needed by the system.
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* See Electricity System Operator Licence

**The Electricity Regulation referred to in objective (c) 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	Positive The proposal will promote the efficiency of the implementation of the Connections Reform, which supports accelerated decarbonisation by connecting projects that are ready and needed. This will increasingly insulate GB electricity consumers from the future risk of further fossil fuel driven price spikes, enhances security of supply and contributes towards sustainable development.
Lower bills than would otherwise be the case	Positive As part of the Connections Reform package, the proposal enables rapid and efficient decarbonisation of the energy system. It helps avoid unnecessary

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	network overbuild and associated costs to consumers, by focusing network investment on projects that are demonstrably ready and needed to deliver Clean Power 2030 and a clean, secure and affordable energy system.
Benefits for society as a whole	Positive As part of the Connections Reform package, this proposal improves quality of service for end consumers by enabling more efficient interactions across the industry value chain. By focusing connections on ready projects needed for Clean Power 2030, it supports timely delivery, avoids unnecessary network overbuild, and reduces costs ultimately borne by consumers.
Reduced environmental damage	Positive The proposal supports a more efficient and fairer implementation of the Connections Reform package. It will protect the interests of consumers (both current and future) which includes their interests in the Secretary of State's compliance with the duties in sections 1 and 4(1)(b) of the Climate Change Act 2008 (net zero target for 2050 and five-year carbon budgets).
Improved quality of service	Positive By facilitating the implementation of Connections Reform, this proposal will also help secure a diverse and long-term energy supply (less reliant on fossil fuels) and promote economic growth, e.g. through enabling timely connections for more projects.

Code Administrator Consultation Summary

The Code Administrator Consultation was issued on the 27 April 2026 and closed on 19 May 2026 and received 9 non-confidential responses. A summary of the responses can be found in the table below, and the full responses can be found in **Annex 03**.

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Code Administrator Consultation summary

Question

Do you believe that the CMP472 Original Proposal better facilitates the CUSC Applicable Objectives?

Five respondents believe that CMP472 better facilitates CUSC Applicable Objectives (i), (ii), (iii) and (iv).

Two respondents believes that CMP472 better facilitates CUSC Applicable Objectives (i), (ii) and (iv).

One respondent believes that CMP472 better facilitates CUSC Applicable Objectives (ii) and (iv).

One respondent believes that CMP472 better facilitates CUSC Applicable Objective (iv).

Do you support the proposed implementation approach?

All respondents support the proposed implementation approach.

Do you have any other comments?

Respondents agree that the modification enables more efficient and accurate delivery of Connections Reform, reducing administrative burden for NESO and DNOs.

Respondents agree that sharing Original/Red Line Boundary (ORLB/RLB) data is critical for Gate 2 compliance, early validation, and consistency across transmission and distribution networks.

Respondents see CMP472 as improving queue management by identifying and removing ineligible or non-compliant projects earlier, reducing unnecessary costs and design work.

Agreement that data sharing is appropriate under existing arrangements, with safeguards in

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	place; most support sharing without requiring additional customer consent. Viewed as supporting cost efficiency by avoiding unnecessary network build and improving system coordination. Multiple respondents recommend clearer implementation detail, including defined SLAs (typically ~5 working days) for data sharing and use of accessible PDF formats rather than alternative file types. Additional suggestions include mandating inclusion of Point of Supply within ORLB, clarifying treatment of non-gated applications, and ensuring applicants are informed of data sharing. Consensus that the modification does not impact Electricity Balancing Regulation (EBR) Article 18 provisions.
Legal text issues raised in the consultation	
The legal text issues raised in the Code Administrator Consultation can be found in Annex 05.	
EBR issues raised in the consultation	
No EBR issues were raised	

Panel Recommendation

The Panel met on the 28 August 2026 to carry out their recommendation vote.

They assessed whether a change should be made to the CUSC by assessing the proposed change and any alternatives against the Applicable Objectives.

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Panel comments on Legal text

Ahead of the vote taking place, the Panel considered the legal text amendments proposed as part of the Code Administrator Consultation and agreed that they were typographical/ that they were not required. The changes made can be found in **Annex 05**.

Vote 1: Does the Original facilitate the Applicable Objectives better than the Baseline?

Panel Member: **Andrew Enzor, Users Panel Member**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Yes	Yes
The Original solution makes a small incremental improvement to the efficiency of the gated connections process. I don't consider it to have a material impact on the remaining objectives.					

Panel Member: **Dan Arrowsmith, NESO Panel Member**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Yes	Yes	Neutral	Yes	Yes
This proposal would introduce a new clause in Section 17 of the CUSC allowing NESO to share the Original Red Line Boundary (ORLB) submitted by Large Embedded Generators (LEGs) with the relevant DNOs without requiring explicit customer consent.					
NESO considers that, if implemented, the modification would have a positive impact on CUSC objective (i) by improving NESO's ability to discharge its obligations					

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efficiently, ensuring only Gate-compliant projects progress through the connections process.

Panel Member: **Garth Graham, Users Panel Member**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Neutral	Yes	Neutral	Yes	Yes
This proposal does better facilitate Applicable Objectives (ii) and (iv), when compared to the baseline, whilst being neutral in terms of (i) and (iii). This is because it will enable a more accurate and thus more efficient delivery of the Connection Reform related Original Red Line Boundary process which will reduce the administrative burden for NESO (and, whilst not directly an item (iv) matter per se, but nevertheless important in keeping costs down, less burden for DNOs). In addition, it will lead to an overall, incremental, improvement in the management of the connection queue in terms of projects that should not have proceeded being quickly identified (and acted upon, by the DNO) which will lead to a better competitive outcome. The Original is 'Best'.					

Panel Member: **Joe Colebrook, Users Panel Member**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Yes	Yes	Neutral	Yes	Yes
Objective (i) - Positive - I believe this modification will help NESO carry out its duties more effectively by ensuring that only projects which have met the relevant Gate requirements continue through the connections process. This should improve the overall efficiency of managing the queue and network resources. Objective (ii) - Positive - By requiring projects to satisfy both Gate 2 and distribution compliance criteria before progressing, the proposal helps ensure that limited					

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network capacity is reserved for credible and committed projects. In my view, this supports a fairer and more competitive environment for developers.

Objective (iii) – Neutral – No impact on the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.

Objective (iv) – Positive – The proposal should support the more efficient administration of the CUSC by reducing unnecessary processing work and allowing NESO and Transmission Owners to focus their efforts on projects that are sufficiently advanced and capable of delivering system benefits.

Panel Member: **Joe Dunn, Users Panel Member**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Yes	Yes	Neutral	Yes	Yes
I consider the Original proposal better facilitates the Applicable CUSC Objectives by enabling a more consistent and efficient validation of the distribution contractual arrangements supporting Large Embedded Generator Gate 2 applications. This should improve the integrity and administration of the connections process, provided the information sharing remains proportionate and appropriately controlled.					

Panel Member: **Nick Sillito, Users Panel Member**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Yes	Yes	Neutral	Yes	Yes
The sharing of the ORLB facilitates the connection application process. The revised readiness declaration application form will cover the consent issues.					

Panel Member: **Paul Jones, Users Panel Member**

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	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	Yes	Yes
The modification should help NESO and the DNOs to process some Gate 2 applications more effectively and efficiently, and therefore better manage the connections queue, meeting objectives i and iv. The modification seems largely neutral against the other objectives. The addition of the wording into the Readiness Declaration form should ensure that generators are aware and have effectively consented to the information being provided as part of that process. Generators are likely to be content to do this as it would facilitate the progression of their application as provided under the CUSC. Additionally, as CUSC Parties, DNOs would be covered by the confidentiality provisions in the code when handling this information.					

Panel Member: **Robert Newton, Consumers Panel Member**

	Better facilitates AO (i)?	Better facilitates AO (ii)?	Better facilitates AO (iii)?	Better facilitates AO (iv)?	Overall (Y/N)
Original	Yes	Yes	Neutral	Yes	Yes
We think that the proposed modification will identify and remove non-compliant projects from the queue earlier, through more efficient data sharing. This will better facilitate the ACOs than the baseline.					

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Vote 2 – Which option best meets the Applicable Objectives?

Panel Member	Best Option	Which objectives does this option better facilitate? (If baseline not applicable).
Andrew Enzor	Original	(iv)
Dan Arrowsmith	Original	(i), (ii) and (iv)
Garth Graham	Original	(ii), (iv)
Joe Colebrook	Original	(i), (ii) and (iv)
Joe Dunn	Original	(i), (ii) and (iv)
Nick Sillito	Original	(i), (ii) and (iv)
Paul Jones	Original	(i) and (iv)
Robert Newton	Original	(i), (ii) and (iv)

Panel Conclusion

The Panel has recommended unanimously that the Proposer's solution better facilitate the CUSC Applicable Objectives.

When will this change take place?

Implementation date:

10 Business Days following an Authority Decision.

Date decision required by

As soon as practical.

Implementation approach

Once the code change is approved, an acknowledgement will be added to the form of Gated Applications and Gated Modification Applications, where LEG applicants would be

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informed that their ORLB submitted to NESO will be shared with respective DNOs as part of the Distribution compliance.

Interactions

☒CUSC ☐BSC ☐STC ☐SQSS
☐European Network ☐EBR Article 18 ☐Other ☐Other
 Codes T&Cs¹ modifications

This proposal is an effort in facilitating the effective implementation of the Connections Reform package ([CMP434](#): Implementing Connections Reform). No interactions with other Codes and regulations were identified.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
DNOs	Distribution Network Operators
EBR	Electricity Balancing Regulation
GC	Grid Code
LEG	Large Embedded Generator
NESO	National Energy System Operator
ORLB	Original Red Line Boundary
SQSS	Security and Quality of Supply Standards
STC	System Operator Transmission Owner Code
TCMF	Transmission Charging Methodologies Forum

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TO	Transmission Owner
T&Cs	Terms and Conditions

Annexes

Annex	Information
Annex 01	CMP472 Legal text
Annex 02	CMP472 Proposal Form
Annex 03	CMP472 Code Administrator Consultation responses
Annex 04	CMP472 Code Administrator Consultation response summary
Annex 05	CMP472 Proposer response to Legal Text queries raised through Code Administrator Consultation