Transmission Charging Methodologies Forum & CUSC Issues Steering Group







11th April 2018

Welcome

Jon Wisdom, National Grid

Housekeeping

- Fire alarms
- Facilities
- Red Lanyards







Actions

TCMF Mor	Request T	Agenda Item	Action	Owner 🔻	Notes	Target Date	Status T
					We are planning to get get all archived		
					modifications available on the website,		
					however this will take some time due to the		
					volume of material. Proposal forms,	Oct 10	
			Make enquiries re missing website content		Workgroup reports, FMRs and decision	Oct-18	
			specifically in relation to previous mods (TCMF		letters will be uploaded. In the meantime		
			members asked to advise when they come across		any specific requests can be sent to the		
Dec-17	РВ	AOB	any additional missing content)	RT	cusc.team@nationalgrid.com.		On-going



Today's TCMF

CUSC Modifications Update

ESO Incentives 2018-2021 Modification Proposal Update



Today's CISG

Updating the Statement of Works Process

Introducing new contractual arrangements for Aggregators

Emergency Disconnection of Embedded Gen

AOB

CUSC Modifications Update

Joseph Henry, Code Admin

New Modifications

■ No new Modifications tabled at the March 2018 CUSC Panel



Ofgem decisions

Ofgem decisions and pending decisions since last TCMF:

There have been no decisions made this month



Mod Ref	Mod area	Customer impacted	Proposal raised by	Process stage	Key activities since last update	next steps
CMP271	Improving the cost reflectivity of demand transmission charges	Generators, Suppliers, Embedded Generators	RWE		WG received update on impact of SCR on CMP271	
CMP274	Winter TNUoS Time of Use Tariff (TToUT) for Demand TNUoS	Generators, Suppliers, Embedded Generation, Transmission Network Operators, HH Demand Customers	UK Power Reserve	Workgroup meetings ~ suspended	WG received update on impact of SCR on CMP274	Ofgem published further clarity to the industry on the scope of the SCR/TCR on 6 November 2017 and Code Admin discussed impact with the Proposers and the WG. The CUSC Panel at its November 2017 meeting agreed to a further extension to the point that Officer issues its minded to
CMP276	Socialising TO costs associated with 'green polices' (reduction in the demand residual element of the TNUoS £/kW ("Triad") charge by creating two new charge lines for all demand offtakes	Parties that manage demand during Triad periods, i.e. embedded generators and those half hourly metered consumers who respond to Triad	Alkane Energy		WG received update on impact of SCR on CMP276	point that Ofgem issues its minded-to position or another event means that the WG should be re-convened.



Mod Ref	Mod area	Customer impacted	Proposal raised by	Process stage	Key activities since last update	next steps
CMP275	Preventing BM units from accessing multiple sources of duplicate and overlapping revenue from ancillary services on the same asset	Generators, Transmission Company and Ancillary Service Providers	UK Power Reserve	WG report sent to WG members for review	WG voted on proposal and new WACM against baseline. WG decided that Baseline currently working better	CUSC Panel extended timetable by 1 month in March, and further extension will be requested at April CUSC panel. WG hope to bring modification vote before April CUSC panel.

Mod Ref	Mod area	Customer impacted	Proposal raised by	Process stage	Key activities since last update	next steps
CMP280	TNUoS: remove liability from Generators for the Demand Residual element of the TNUoS tariff.	Suppliers, Generators	Scottish	WG to continue developing the	WG issued a draft of the WG reports for review 7 March 2018 for a two	Consolidate comments received by the WG on the WG report – will either agree comments ex-committee or arranged a WG to agree.
CMP281	BSUoS: remove liability from Generators BSUoS charges on imports	and NGET	Power	Proposal	week review period. Comments currently being reviewed.	Note WG Consultation due to be issued April/May 2018

Mod Ref	Mod area	Customer impacted	Proposal raised by	Process stage	Key activities since last update	next steps
CMP285	CUSC Governance Reform – Levelling the Playing Field	All CUSC Signatories	UKPR	WG to continue developing the Proposal	WG reviewing draft of WG report	Legal text currently being reviewed. Note WG Consultation due to be issued May 2018



Mod Ref	Mod area	Customer impacted	Proposal raised by	Process stage	Key activities since last update	next steps
CMP286	Improve the predictability of TNUoS demand charges by bringing forward the date at which the target revenue used in TNUoS tariff setting is fixed to allow customer prices to more accurately reflect final TNUoS rates.	Suppliers, Generators, embedded generators and National	Npower	WG to continue developing the Proposal	WG Report Issued	WG Consultation report scheduled to be issued at start of May 2018 – this is at risk but until WG meetings held no extension to be requested
CMP287	Improve the predictability of TNUoS demand charges by bringing forward the date at which certain parameters used in TNUoS tariff setting (such as demand forecasts) are fixed to allow customer prices to more accurately reflect final TNUoS rates	Grid				



New Modifications

■ Five new Modifications tabled at the February 2018 CUSC Panel

Mod Ref	Mod area	Customer impacted	Proposal raised by	Process stage	Key activities since last update	next steps
CMP288	Introduce explicit charging arrangements to recover additional costs incurred by Transmission Owners and TNUoS liable parties as a result of transmission works undertaken early due to a User initiated delay to the Completion Date of the works, or to facilitate a backfeed. Consequential change to support the introduction of explicit charging arrangements for customer delays and backfeeds via CMP288.	Electricity Transmission Owners; Developers requiring new generation, interconnector or demand connections and Parties that pay TNUoS	NGET	Workgroup nominations received and agreed by CUSC Panel	n/a	1 st Working Group to be arranged late April/Early May



New Modifications continued

Mod Ref	Mod area	Customer impacted	Proposal raised by	Process stage	Key activities since last update	next steps
CMP291	Set out within the CUSC the obligations in the EU Connection Network Codes and System Operation Guideline as they relate to the harmonised rules for connection and system operation in GB.	Transmission Owners (including OFTOs and Interconnectors), Distribution Network Operators, Transmission System Users, System Operator, Generators, Demand customers and providers of services	SSE	Workgroup nomination s open ~ proposer asked to source extra workgroup members	n/a	Proposer to souce extra Working Group Members. Once this is arranged, 1 st WG to be organised
CMP292	Ensure that the charging methodologies (all Charging Methodologies as defined in the CUSC) are fixed in advance of the relevant Charging Year to allow The Company – as Electricity System Operator - to appropriately set and forecast charges. Introducing a cut-off date for changes to the methodologies will help to reduce the risk of charges out-turning differently to the forecasts produced by the Company and created by Users	CUSC Parties, NGRID	NGET	Workgroup nomination s closed	n/a	1 st WG to be arranged

CUSC Modifications

Plan on a Page and other CUSC Panel related material can be accessed using the following link:

https://www.nationalgrid.com/uk/electricity/codes/connection-and-use-system-code?meetingdocs

With Authority, awaiting decision - please refer to the following link for further information; https://www.ofgem.gov.uk/system/files/docs/2017/04/indicative decision dates for modification with ofgem.pdf

CMP251 - Remove error margin cap on TNUoS compliance with EU (British Gas)

WG - Workgroup ConS - Consultation * Timetable at risk/to be confirmed by

	April	May	June	July	August	September	October
		Modifications					
CMP250 - Stabilising BSUoS with 12 month notice period (Drax Power)	With Autho						
*CMP271 - Improving the cost reflectivity of demand tx charges (RWE) and CMP274 - Winter TNUOS Time of Use Tarriff for Demand TNUOS (UK Power Reserve) and CMP276 - Socialising T costs associated with "green policies" (Alkane)			WG Mod Dev o	n hold pending	outcome from S	GCR/TCR	
CMP275 - Transmission generator benefits in the provision of ancillary and balancing services – levelling the playing field.		CA Cor	nS M	With .	Authority		
CMP280 - New Generator TNUoS Demand Tariff which Removes Liability for TNUoS Demand Residual Charges from Gen and Storage Users' and CMP281 - Removal of BSUoS Charges From Energy Taken From the National Grid		WG	/G ConS		WG ConC		CA ConS
System by Storage Facilities (Scottish Power)							•—
CMP285 - CUSC Governance Reform - Levelling the Playing Field' (UKPR)		WG	WG ConS		WG ConC		CA ConS
*CMP286 - Improving TNUoS Predictability Through Increased Notice of the Target Revenue used in the TNUoS Tariff Setting Process.				WG Mod De	V		
(npower) and CMP287 - Improving TNUoS Predictability Through Increased Notice of Inputs Used in the TNUoS Tariff Setting Process. (npower)							

WG Report to CUSC Panel

FMR to Authority

CUSC Modifications

Plan on a Page and other CUSC Panel related material can be accessed using the following link: https://www.nationalgrid.com/uk/electricity/codes/connection-and-use-system-code?meeting-docs With Authority, awaiting decision – please refer to the following link for further information; https://www.ofgem.gov.uk/system/files/docs/2017/04/indicative_decision_dates_for_modification_with_ofgem.pdf

CMP251 - Remove error margin cap on TNUoS compliance with EU (British Gas)

WG - Workgroup
ConS - Consultation
WG ConC - Workgroup Conclusion
CA - Code Administrator Consultation
DRMR - Braft Final Modification Report
* Timetable at risk/to be confirmed by

	April	May	June	July	August	September	October	
		Modifications						
CMP288 - Introduce explicit charging arrangements to recover additional costs incurred by Transmission Owners and TNUoS liable parties as a result of								
ransmission works undertaken early due to a User nitiated delay to the Completion Date of the works, or to acilitate a backfeed (NGRID)				WG Mo	d Dev			
and CMP289 - Consequential change to support the ntroduction of explicit charging arrangements for customer delays and backfeeds via CMP288.								
CMP290 Housekeeping change to CUSC Section 14 equired as a result of the implementation of CMP264, CMP265, CMP268 and CMP282 (NGRID)	Implement							
CMP291 - Set out within the CUSC the obligations in the EU Connection Network Codes and System								
Operation Guideline as they relate to the harmonised rules for connection and system operation in GB (SSE)	WG nominations	WG Mod Dev						
CMP292 - Ensure that the charging methodologies are fixed in advance of the relevant Charging Year to allow The Company to appropriately set and forecast charges.								
NGRID)				WGN	lod Dev			

WG Cons

WG Conclusion

CA Cons

WG Report to CUSC Panel

DFMR

Panel recommendation / determination vote

FMR to Authority

Indicative decision from Authority

WG Mod Developmen

national**grid**Code Governance Team – who to contact

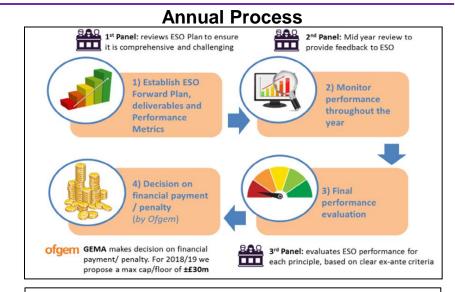
- For **CUSC** related matters Email: <u>cusc.team@nationalgrid.com</u>
- For **Grid Code** related matters Email: <u>Grid.Code@nationalgrid.com</u>
- For **STC** related matters Email: <u>STCTeam@nationalgrid.com</u>
- For **SQSS** related matters contact Email: box.SQSS@nationalgrid.com
- For **JESG** related matters Email: <u>box.europeancodes.electricity@nationalgrid.com</u>

ESO incentives 2018-2021 **Modification Proposal Update**

Urmi Mistry, National Grid

Recap

- The ESO regulatory and incentive framework for 2018-21 has been revamped
- There is now a single evaluative incentive covering all of the ESO's activities
- This is worth ±£30m per year
- There is no more BSIS



Performance criteria

- Evidence of delivered benefits
- Evidence of future benefits / longer term initiatives
- Wider stakeholder evidence
- Plan delivery
- Performance metrics and justifications

Reason for Change

- New Incentive framework has gone live (1st April 2018).
 - Reflecting Licence changes that have already been agreed.
 - New special Licence Condition 4M.
- Change to how external incentive scheme payment element is generated.
- Move from a mechanistic approach to an evaluative approach.

Ofgem's Decision

- On 28th March Ofgem published their consultation decision letter.
- Going ahead with changes consulted on with minor typographical changes.
- Suggested NG change (on next slide) not appropriate at this time.
- Ofgem are happy to work on this with the ESO and industry to determine method for future years.

Reason for Updated Proposal

- Reconciliation BSUoS volatility
- NG response to Licence change consultation
 - Licence should allow for an adjustment in relevant year t+1.
 - Suggestion of a TotAdj_t term
 - Will work with Ofgem and industry to determine a suitable approach.



The Proposal (Updated)

DRAFT LEGAL TEXT Changes

External BSUoS Charge for each Settlement Period (BSUoSEXT_{id})

14.30.6 The External BSUoS Charges for each Settlement Period (BSUoSEXT_{jd}) are calculated by taking each Settlement Period System Operator BM Cash Flow (CSOBM_j) and Balancing Service Variable Contract Cost (BSCCV_j) and allocating the daily elements on a MWh basis across each Settlement Period in a day.

[Need to amend equation below from Incpayext_d to incpayext_t and remove LBS]

$$BSUoSEXT_{jd} = CSOBM_{jd} + BSCCV_{jd} \\ + \left[\text{IncpayEXT}_{j} + BSCCA_{d} + ET_{d} - OM_{d} + FIIR_{d} + BSC_{d} + SOTOC_{d} + LBS_{d} \right] \\ * \left\{ \left| \sum_{j \in d}^{+} (QMBSUoS_{ijd} * TLM_{ijd}) + \left| \sum_{j \in d}^{-} (QMBSUoS_{ij} * TLM_{ij}) \right| \right\} \right] \\ \sum_{j \in d}^{+} \left\{ \left| \sum_{j \in d}^{+} (QMBSUoS_{ij} * TLM_{ij}) \right| + \left| \sum_{j \in d}^{-} (QMBSUoS_{ij} * TLM_{ij}) \right| \right\} \right]$$

The Proposal (Updated)

DRAFT LEGAL TEXT

External Incentive Payment (IncPayExt,)

14.30.7 In respect of each settlement d, IncPayExt_t will be determined in line with Transmission Licence Special Condition 4M.

- Remove original 14.30.7 to 14.30.13 and removal of section 14.32.
- Update acronyms in 14.31.8
- Removal of section 14.32 (worked example)

We have removed our proposed text 14.30.8 which can be found in March's TCMF slide pack.

New Proposal

- Recommend straight to Code Admin Consultation:
 - WHY...?
 - Confirmation from Ofgem on actual changes.
 - National Grid Circular document
 - Reduction in scope of CUSC Change (no change to reconciliation process)

CUSC Issues Steering Group (CISG)

Updating the Statement of Works Process

Rachel Tullis, National Grid

Statement of Works

- Statement of Works Process outlined in CUSC section 6.5 (Obligations of Users Who Own or Operate Distribution Systems)
 - Process between National Grid and Distribution Network Operators (DNO)
 - Does not cover any processes between DNOs and Distributed Generators
- Designed to identify impact on the NETS of Distributed Generation wishing to connect to the Distribution System:
 - On receipt of request for connection to / use of Distribution System DNO to make a request for a Statement of Works to NGET
 - NGET will respond with a Statement of Works
 - DNO to return Confirmation of Project Progression

What is the issue?

- Current Statement of Works process considered not to be fit for purpose:
 - Can take up to 12 months to complete (from initial DG application)
 - Does not consider cumulative impact of DG making for an inefficient process

What has been done by industry?

- CMP238 (Application of Statement of Works process when a modification application is made)
 - Allowed DNOs to skip stage 1 of the Statement of Works process where the DNO already knows that there is a transmission system impact
 - Felt by industry to be only part of the solution and ENA Statement of Works Workgroup established to consider further improvements to the process
- Appendix G Trial (becoming known as Transmission Impact Assessment)
 - Facilitates assessment of DG on an aggregated basis
 - DNO updates SO with details of DG regularly
 - DNO able to make offers to DG customers without individual reference to National Grid in majority of cases

Scope of Modification Proposal

- Amendments to CUSC section 6.5 to facilitate Appendix G / Transmission Impact Assessment process
 - Retaining existing Statement of Works process for where single applications are still appropriate
 - Introducing option for aggregated applications as per Appendix G trials
 - High level process between National Grid and DNOs for Appendix G updates (currently outlined in BCAs) to be outlined in CUSC
 - Request for assessment
 - Timescales for response
 - Ongoing requirements and timescales for updates and confirmation

Out of Scope for Modification Proposal nationalgrid

- DNO / Distributed Generator Process
- Detailed internal processes
 - Appendix G, and therefore the **detailed** internal processes associated will continue to evolve. We do not want to include a level of detail in the CUSC that becomes onerous to maintain / keep up to date.
 - Happy to discuss the extent of detail around process required in the workgroup.
- Overly prescriptive Appendix G format
 - As above, the Appendix G format is continuing to evolve we would like a format which offers a framework to work within but is flexible enough that it doesn't become onerous to maintain as improvements are identified.



Recent Engagement & Next steps

- Presented at ENA Statement of Works Workshop in March
- Plan to submit modification to April CUSC panel



Introducing new contractual arrangements for Aggregators (Project TERRE)

Harriet Harmon, National Grid

Background

- P344 looks at the implementation of EU TERRE arrangements into the GB Market;
- Under this BSC change, non-BSC Parties can choose to become, "Virtual Lead Parties"
- These VLPs will accede to certain sections of the BSC such that they can participate in the BM;
- Relevant sites will be registered to a VLP's "Secondary BMU" and the Supplier's Base BMU;
- A VLP won't be a Trading Party, and won't submit Notifications;

VLPs as 'Aggregators'

- Under the BSC, a VLP will be able to aggregate multiple EGs to create a BMU;
- Those EGs will take instruction to provide Ancillary/Balancing Services via the VLP;
- The Supplier who has the SVA EG registration will bear the BSUoS & TNUoS liability;
- The VLP as the aggregator does not itself own the connection points and isn't the DNO's connection customer;
- 'Aggregator' could be a broader definition than the BSC-specific
 VLP future-proofing against market movements

Why Change?

- Concept of Aggregators doesn't exist in CUSC (pending S14/11 mods);
- EG normally would have BELLA or BEGA directly with NGET;
- Aggregator doesn't own or technically operate the EG plant no TEC requirements;
- Some technical requirements being delivered through GC0097;
- Some technical requirements would normally be in the F5 of BEGA;
- CUSC Accession ———— Grid Code compliance

Principles of change

- Limited to SVA any CVA EG must use extant arrangements;
- Aggregators don't need TEC;
- Aggregators aren't the User liable for UoS charges;
- The Operational Metering requirements rest with the aggregator;
- Incremental, minimal change to facilitate TERRE only;
- Ensure accession to S1, 5-8 & 11;
- No changes to Accession, BELL or BEG Agreements;

What's changing?

- Introduce & define new party category Aggregators (S1 & S11);
- Update application process to include new party (S1)
- Create a new or amend extant (tbd by WG) Application Form for new party category (non-'user') (Exhibit F);
- Create a new Agreement for Aggregators BELLA/BEGA hybrid utilise existing F5 (Schedule 2, new Exhibit);

Charging mod being raised separately - complete suite

For reference – areas covered by referenced sections (inter alia)

- Section 1 application of sections, User categories
- Sections 5 8 GC compliance, governance, de-en, discon, disputes & general provisions;
- Section 11 definitions and interpretation;
- Exhibit F Supplier/Interconnector application form;
- App F5 appendix to BEGA which contains site-specific tech requirements;

Emergency Disconnection of Embedded Generation

Bieshoy Awad, National Grid

Contents

- High Level Objective
- Wider Access to BM
- Emergency Instructions
- Emergency Disconnection of Embedded Generation
- Next Steps



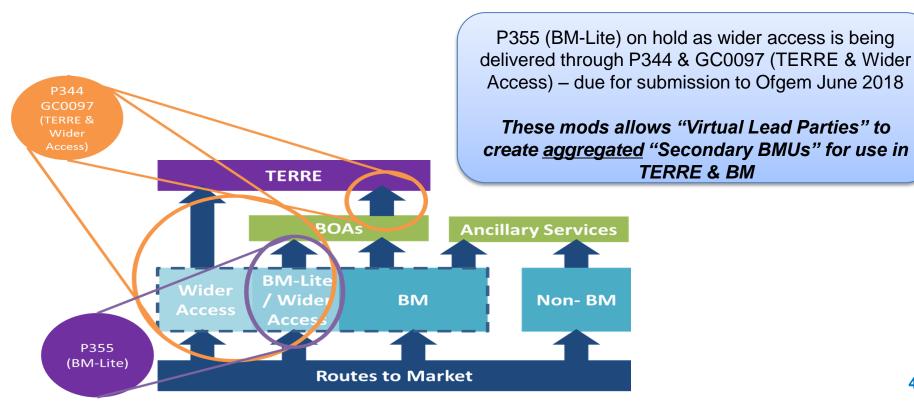
High Level Objective

As the capacity of embedded generation increases we need to ensure that we have the tools to manage the networks in emergency situations as well as normal operating conditions.

Wider Access to BM Overview of Current Mods

- Access routes to the BM and TERRE for Distribution connected participants are being developed through BSC modification P344 and corresponding Grid Code modification GC0097.
- These modifications are due to be submitted to the Authority for decision June 2018.
- Proposed implementation Q4 2019.
- If approved, will provide a mechanism for call off and compensation of Distribution connected generation through the BM.

Wider Access to BM Overview of Current Mods



Wider Access to BM Potential issues for consideration

- P344 and GC0097 provide a mechanism through which aggregated BMUs will be able to be called for Balancing Services, including the BM.
- This gives a potential call off and compensation route for distributed participants without having to use Emergency Instructions.
- However, still uncertainties around how aggregation will work with this in terms of systems. It may be that a whole aggregated BMU (which could be across a whole GSP group) would need to be called as a single unit rather than by sub-unit.
- Also, participation will be optional rather than mandatory so not all distributed participants captured.

Emergency Instructions: Background Material

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■ The Grid Code: BC2.9, OC6

Balancing Principles Statement: Part B Section 5 – available online at https://www.nationalgrid.com/sites/default/files/documents/Balancing%20Principles%20Statement%20v15%20Effective%20from%201%20April%202017.pdf

CUSC:5.2 and the associated definition

Emergency Instructions: Utilisation



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Events

Demand Control

System and Localised Negative Reserve Active

Power Margin

Black Start

Max Gen

Frequency Sensitivity

Communication Failure

Sequence of Disconnection

Most effective units

Price (Bid-Offer)

Contribution to losses

Reserve/ response capability

Reactive capability

Dynamic parameters

If a commercial option is available within the timescales required we would take commercial actions first

Emergency Instructions: Post Event



Restoration:

Reverse order of disconnection

Compensation:

Generation: In line with Access Rights and BM Participation

Demand: No compensation offered

Reporting:

Immediate: Balancing Mechanism Reporting Service

Annual: Balancing Principles Statement Report –

Audited by an independent consultant

Emergency Instructions: Plant covered

Plant	Covered or not				
Transmission Connected					
Generation	✓				
Demand	✓				
Grid Supply Point	✓				
Distribution Connected					
Demand	✓				
Large Power Station	✓				
"An item of Plant or Apparatus"	✓				
Medium/Small Power Station	Not explicitly				

Emergency Instruction for EG Why Change

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Issue:

Ability to issue emergency instructions to DNOs to disconnect embedded small and medium power stations is subject to interpretation

Risk:

Inability to manage emergency situations that are caused or exacerbated by an embedded small or medium power station



Interim Solution:

Through the SoW process, impose emergency disconnection requirements, via the DNO, on new embedded generation (generally listed in the BCA)



Enduring Solution:

Modify the Grid Code, Distribution Code, CUSC, and BSC – if required – to provide clarity



Emergency Disconnection of EG What Needs to Change

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Clear and transparent requirements – potentially a new OC or a change to OC6

Set of equitable rules to reduce the risk on any specific Generator

Generic process

Relevant data submissions

Any relevant changes to the legal and commercial frameworks

Emergency Disconnection of EG What Needs to Be Agreed

Should we have the capability?	If not, need to justify why embedded generation receives preferential treatment to everyone else.		
Affected plant:	All embedded generation?		
·	Above certain MW capacity?		
	After certain date?		
	 Reopener for revision 		
Process	We have a process agreed with some DNOs. This can be rolled out unless there are any concerns.		
■ Week 24 Submissions	Can we tailor this on emergency demand disconnection?		

Emergency Disconnection of EG Risks to EG

■ Minimal risk – only 13 Emergency Instructions in the last 4 years.

Impact is less sever than the consequence of the emergency situation materialises.

Rules will be developed to ensure equitable impact on all parties.

Opportunity for embedded generation to join the BM.

Emergency Disconnection of EG Legal and Commercial Issues

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- Embedded Medium and Small Power Stations are generally not CUSC or BSC Parties
- CUSC

Section 5.2 covers emergency disconnection for embedded Large Power Stations (Users). Could this be extended to cover all embedded power stations?

Any other impact?

Distribution Code

What rights do DNOs have?

Could these be extended

BSC

Any views on this?

BCAs

Changes to any BCAs as a part of this Grid Code modification should be minimal—if at all required.

Next Steps

Agree the impact on the Grid Code;

Identify potential consequential changes to other codes, policies, and industry frameworks;

Agree timescales for submission of these proposals;

Develop a proposal for a Grid Code modification and submit it to the GCRP;

Propose any consequential modifications in accordance with the governance of the affected code/policy/framework.

AOB

Jon Wisdom, National Grid

Next meetings

May
June

9
13
Wednesday
Wednesday

Will be an 10:30am start unless otherwise notified.

national grid We value your feedback and comments

If you have any *questions* or would like to give us *feedback* or share *ideas*, please email us at:

cusc.team@nationalgrid.com

Also, from time to time, we may ask you to participate in surveys to help us to improve our forum – please look out for these requests

LUNCH





Close