

## Meeting report

<b>Meeting name</b>	Transmission Charging Methodologies Forum and CUSC Issues Steering Group 83
<b>Date of meeting</b>	Wednesday 11 <sup>th</sup> April 2018
<b>Time</b>	10:30 – 12:30
<b>Location</b>	National Grid House, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA

<b>Name</b>	<b>Initials</b>	<b>Company</b>
Jon Wisdom	JW	National Grid (Chair)
Urmi Mistry	UM	National Grid (TCMF Technical Secretary)
Rachel Tullis	RT	National Grid (Presenter)
Harriet Harmon	HH	National Grid
Bieshoy Awad	BA	National Grid (Presenter)
Joseph Henry	JH	National Grid (Presenter)
Shazia Akhtar	SA	National Grid
Jennifer Groome	JG	National Grid
Robert Longden	RL	Cornwall Insight
Grace Smith	GS	UKPR
Colin Prestwich	CP	Smartest Energy
Paul Youngman	PY	Drax
Garth Graham	GG	SSE
Andrew Ho	AH	Orsted
Simon Vicary	SV	EDF Energy
Franck Latremoliere	FL	Reckon LLP
Nicola Percival	NP	Innogy
Kyran Hanks	KH	Waters Wye
Daniel Hickman	DH	npower
James Anderson	JA	Scottish Power
Paul Mott	PM	EDF Energy
James Thomson	JT	Ofgem
Kyle Martin	KM	Energy UK

All presentations and supporting papers given at the TCMF meeting can be found at:  
<https://www.nationalgrid.com/uk/electricity/charging-and-methodology/transmission-charging-methodology-forum-tcmf>

## Actions Review – Jon Wisdom, National Grid

1. JW reviewed the open actions and informed attendees that the website update deadline has been extended to October 2018 to account for the workload involved in getting all the material on the website. PY raised a point regarding National Grid's Data Retention Policy in light of GDPR (General Data Protection Regulation) regarding details held by National Grid on Workgroups etc. GG asked whether it could be confirmed that TAR modifications were available on the CUSC website considering the SCR/TCR. JW noted that the TAR modifications had been uploaded previously so understanding was that they were available. **Action: JH took an action to check and confirm if/when these modifications would be available on the website.**

## 1 CUSC Modifications Update – Joseph Henry, Code Admin

2. JH gave an update on all CUSC modifications. There were no new modifications raised in March. A workgroup was held for CMP275 on the 26<sup>th</sup> March and the workgroup report is due to go to April's CUSC Panel. Workgroups for all other modifications are being arranged.

## 2 ESO Incentive Scheme Modification Update – Urmi Mistry, National Grid

3. UM provided a recap of the new regulatory framework and reasons for this change. The new framework went live on the 1<sup>st</sup> April 2018 and the modification proposal aims to reflect licence changes. Since last month's presentation, Ofgem published their consultation decision letter, where all suggested changes will be taken forward. Reconciliation came up as area of concern for attendees in March due to the further impact on volatility of BSUoS. This process has now been removed from the proposal and the enduring CUSC arrangements will continue.
4. NGENSO responded to Ofgem's consultation suggesting detailing the reconciliation process within the Licence. This will be worked on with stakeholders to determine suitable approach. NG has also published a document detailing how the incentive payment will be recovered for the current financial year (2018-19).
5. One attendee stated that he was of the view that the performance criteria by which NGENSO were to be measured was missing from this CMP, and that he considered them to be vague/overly-simplified; it was confirmed by NGENSO that this had been deemed as out of scope and that should any CUSC party or (Designated) Materially Affected Party wish to raise a separate modification to address any concerns they might have with the incentive scheme they were able to raise a separate CMP, as this particular CMP focussed on ensuring that the NGENSO SLCs and the CUSC S14 were aligned insofar as they relate to BSUoS incentives.

## CUSC Issues Steering Group

## 3 Updating the Statement of Works Process – Rachel Tullis, National Grid

5. RT introduced this section with the aim of updating attendees with progress since the topic was last presented in January and provided an overview of the current

Statement of Works (SoW) process. PM asked questions around applicable charging arrangements, such as securities, connect and manage and connection assets. RT advised that some of the questions were quite specific to charging and not to the modification proposal being discussed asking to follow up with PM outside of the forum.

6. RT then presented on what has been done so far regarding SoW, such as CMP238 and Appendix G trials. Regarding the trials, PM asked if connect and manage applied such that embedded generation would have to wait for any enabling works. RT advised that the works required would depend on the GSP (Grid Supply Point). BA advised that for connect and manage the same principles applied. However, for non-BM generation, the scope of Enabling Works may exceed that required for a Power Station of the same capacity, at the same site, but is the subject of a BEGA. This is to ensure that NGET can operate the system in a safe manner (CUSC 13.2.4.3).
7. RT followed this by going through the scope of the proposal, which is to capture the high-level process that occurs between NG and the DNO (Distribution Network Owner). Topics that are out of scope are areas such as the DNO/Distributed Generator process, detailed internal processes etc. RT closed by going over engagement and next steps where the proposal is planned to be submitted to April's CUSC Panel.
8. GG raised a question around stakeholders being able to see details of the interactions between NG and DNOs. RT responded that this proposal was not looking to add detail as these are bilateral agreements between NG and the DNO but will note the high-level process within the CUSC. Any concerns attendees have with what the DNO is passing on to them needs to be discussed with their specific DNO. PM raised a query on a guidance document on NG's website which appeared to require updating. Action: **NG agreed to take away and look in to.**
9. PY asked whether there was documentation stating the assessment, success criteria etc. for the Appendix G trials and why they are being taken forward. RS confirmed that the ENA had [published slides](#) on their website detailing this rationale (these have been circulated to attendees). There was then some discussion around application fees and if there were any consequential impacts on them. This led onto question around the scope of the defect and CUSC applicability to relationships between the DNO and Embedded Generation.

## 4 Introducing new contractual arrangements for Aggregators (project TERRE) – Harriet Harmon, National Grid

10. HH introduced this topic, making attendees aware that this general topic has been presented previously and doesn't propose to revisit the specifics of TERRE or the BSC modification P344. HH then gave a brief background on P344 and what a VLP (virtual lead party) is. The proposal is suggesting to term VLPs as 'aggregators' as this will encompass a wider definition than the BSC-specific VLP which will be a future proof change.
11. HH then went over the reasons for change such as the concept of aggregators does not exist in the CUSC, the aggregator doesn't own or technically operate the embedded plant so there are no TEC requirements etc. HH then went through which sections in the CUSC would be changing as part of the proposal and she also

highlighted that the charging modification is being raised separately and so there is now a complete suite of modifications.

12. PY raised a question on the activity of a VLP and whether a specific Licence would be required in the future. HH responded that currently aggregation is not a licensable activity and the BSC will define the type of activity but fundamentally this is self-definition. GG then went on to discuss why this was limited to project TERRE and not encompassing wider European Network Codes (ENC). HH responded that TERRE and ENC changes are significant so they have been broken down to make them manageable, as has been done previously with large code changes. JW followed by emphasising that this is a clear and defined element of change that is needed to be made to the CUSC. A further discussion ensued which HH agreed to follow up with GG separately.

## 5 Emergency Disconnection – Bieshoy Awad, National Grid

13. BA presented on Emergency Disconnection, which is a tool the System Operator can use when the system is in emergency conditions and there are no more commercial options available. This was also presented at the GCDF (Grid Code Development Forum). Movement is needed in this area as there is an increasing amount of embedded generation (EG) on the network, therefore there is a need for different tools to be able to manage them. From this there is a need for the ESO to be able to operate the system under normal and emergency conditions.
14. There are also current on-going modifications which would give the ESO more commercial access to EG such as P344 and GC0097. However, there is also a need to make explicit arrangements for emergency instruction of EG. Emergency instruction, in general, is rarely used therefore this will be more of an insurance policy. The key clarification during this discussion was that emergency instructions will only be used where all commercial options available within the timescale have been used and there is no other commercial option.
15. BA then took attendees through post-event (after an emergency event) processes, where there will be restoration, compensation and reporting. GG asked if there was industry visibility of the instruction and to whom it was issued. BA responded that there is a report that publishes the instruction and how many times this is issued to that part of the system, however he cannot confirm if the specific generator is noted. GG followed that this could lead to a danger of NG using the same generator for these instructions that the market can't see, which could potentially lead to discrimination within an area. This led to discussion on contractual arrangements, in that if NG instructed a generator directly this could be possible but if NG instruct a DNO, which generation they disconnect is not visible to NG. BA said he would take this point away and consider if this sits in the CUSC.
16. BA then highlighted all the types of plant that are covered under the Emergency Instruction provision where he highlighted that only small/medium EG is not explicitly covered. GG asked how aggregators would be treated as they do not own or operate the plant. HH responded that it would be the DNO who was issued the instruction by the ESO, how the DNO chooses to fulfil this instruction is up to them. GG then raised the question as to how demand response would be instructed, referencing Project CLASS. BA took this away as something that needs to be considered.

17. As the only part that is not defined is regarding small/medium EG located on the distribution network, there is a need to introduce requirements for issuing Emergency Instructions to these parties. The reasoning behind this are factors such as the risk that NG cannot manage an emergency situation and the current ability to instruct EG is subject to interpretation. There is an interim solution where the ability to issue emergency instructions is agreed with the DNO and the DNO will instruct EG. GG requested clarity on this wording as any new EG (under the Statement of Works process) has an obligation within their connection agreement which covers Emergency instructions. Therefore, there is a need to agree a clear set of requirements within Codes, where appropriate, however this can be looked at further within a workgroup.
18. BA then described what needs to change for this to happen such as clear and transparent requirements, equitable rules and having a generic process amongst other things. Due to time constraints BA summarised what needs to be agreed going forward such as affected plant, should NG have this capability and what process should be followed. An attendee raised the point that a process needs to be agreed by all parties involved, not just the DNO. Lastly JW raised the point that a further requirement to consider is reporting.

## AOB

19. JW notified attendees that there were going to be multiple modifications raised at this month's CUSC Panel including legal separation and VLP charging as well as those discussed above.
20. JW also highlighted that there will be a meeting held in London during the summer, possibly July, but we will notify attendees of when this will be.

## Next meeting

**Next meeting: Wednesday 9<sup>th</sup> May 2018**

**Time** : **1030** (unless otherwise notified)

**Venue** : **National Grid House, Warwick** (unless otherwise notified)

## Appendix 1

### Actions List

TCMF Mor	Request	Agenda Item	Action	Owner	Notes	Target Date	Status
Dec-17	PJ	Co-location Guidance Note	Confirm if a spare bay would be considered a new or existing connection	SY	SY and MO are going to pull together a brief response which can be circulated to TCMF members in January.	Jan-18	Complete
Dec-17	GG	Co-location Guidance Note	Confirm if any sites are currently impacted by this guidance note.	SY		Jan-18	Complete
Dec-17	-	Co-location Guidance Note	SY to take away how the document is framed and set the tone according to feedback received	SY		Jan-18	Complete
Dec-17	NF	CMP261 - Update	Look into the possibility of creating some scenarios around outcomes of CMP261 appeal	JW	Not possible ahead of the conclusion of the appeal.	Jan-18	Complete
Dec-17	All	Tariff Update - 5 year forecast	Explore if there is a way to identify mailing lists in email communications such that people know which mailing list that they are on	JW & RT	Feedback and suggestion given to teams internally (including central customer team who have been asked to share more widely).	Mar-18	Complete
Dec-17	PB	AOB	Make enquiries re missing website content specifically in relation to previous mods (TCMF members asked to advise when they come across any additional missing content)	RT	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, Workgroup reports, FMRs and decision letters will be uploaded. In the meantime any specific requests can be sent to the <a href="mailto:cusc.team@nationalgrid.com">cusc.team@nationalgrid.com</a> .	Oct-18	On-going
Jan-18	-	Electricity System Operator Incentives 2018-2021	Circulate DB's contact details to attendees	UM		Jan-18	Complete
Apr-18	GG	CUSC Modification Update	Check that TAR Modifications are available on NG's website.	JH		Jun-18	On-going
Apr-18	PM	Updating the Statement of Works Process	Query was raised around a guidance document on small embedded generation, that is currently available on NG's website. NG was asked to look into the content.	RT	We will update the guidance document following modification process to reflect any changes to the CUSC.	End of CMP298 Mod Process	On-going