

CAP149: Transmission Entry Capacity with restricted access rights

CUSC Amendment Panel Vote

CAP149 Proposed amendment

Scottish and Southern Energy

- ◆ Amend CUSC to formalise access arrangements whereby some Users, through non-standard variations to their Bilateral Agreement, have restricted access to transmission system
- ◆ Establish new access product for existing and future Users with restricted access (“TEC-lite”)
- ◆ Only difference between TEC and “TEC lite” is User’s right to export power
 - ◆ Proposer suggested TNUoS charge for TEC-lite be lower than for TEC to reflect:
 - ◆ Lack of incentive to request connection design variation
 - ◆ Lesser right of access

CAP149 Working Group Alternative

- ◆ Key objectives of original are met with:
 - ◆ Changes to connection application form to allow User to request details of standard and design variation connection
 - ◆ Obligations for NG to provide:
 - ◆ Design variation connection offer
 - ◆ If requested, information to allow User to assess prob of access restrictions
 - ◆ Restricting to new connection applications (but existing Users could apply for Mod App)
 - ◆ Further development of notification process for outages of “named circuits”

CAP149 Consultation Alternative 1

Scottish and Southern Energy

- ◆ Proposer states that WGAA1 addresses access rights aspect of defect but not charging aspect
- ◆ CAA1 seeks to address this by differentiating between connection design variation Users that qualify for a TNUoS discount and those that pay full TNUoS
- ◆ Those that pay full TNUoS are entitled to equal access rights in the form of Interruption Payments for loss of access
- ◆ In all other respects, CAA1 is identical to WGAA1

CAP149 Consultation Alternative 2

National Grid

- ◆ Based on WGAA, with the following changes:
 - ◆ Includes mechanism to allow National Grid to make changes to outage conditions to maintain SQSS compliance
 - ◆ Additional step to allow User to justify multiple access restriction breaches, and reduce TEC if necessary to avoid further impact on system and other Users until remedied
 - ◆ Make changes to Grid Code OC2 process to improve communication of outages of “named circuits” instead of introducing dedicated CUSC process

CAP149 views and representations

- ◆ The Working Group supported the WGAA
- ◆ 9 responses to consultation were received, all supportive of WGAA
- ◆ 7 responses to the consultation alternative consultation were received:
 - ◆ 2 supportive of CAA1 and CAA2;
 - ◆ 2 supportive of CAA1 only;
 - ◆ 1 supportive of CAA2 only; and
 - ◆ 2 that did not support CAA1 or CAA2
- ◆ 1 response to the publication of the draft amendment report was received which included extensive comments and details of process concerns associated with CAA2

CAA2 process concerns

- ◆ Why does NG have to submit CUSC mod in appropriate format but, unlike other CUSC parties, not have to do the same for CAAs?
 - ◆ “clear case of discrimination”
 - ◆ “Non-NG CUSC parties at a clear disadvantage”
 - ◆ “Authority (& other CUSC parties) cannot be certain what NG CAA changes are”
- ◆ NG response
 - ◆ CAA form introduced to address issues with CAAs
 - ◆ NG having difficulty determining:
 - ◆ Whether CUSC Party was raising CAA
 - ◆ Ensuring necessary details were provided (CUSC 8.19.6)
 - ◆ NG has not historically responded to own consultations therefore need for CAA form not envisaged
 - ◆ Happy to do this if it aids clarity?
 - ◆ However, CAA2 is valid and is fully compliant with CUSC 8.19.6