

CUSC AMENDMENT PROPOSAL FORM & CONSULTATION ALTERNATIVE GUIDE

Please note: This is not mandatory and is only provided to assist proposers

These guidelines are to assist proposers when completing a CUSC Amendment Proposal Form; www.nationalgrid.com/uk/Electricity/Codes/systemcode/amendments and when considering submitting a Consultation Alternative.

This document states who and what should be completed in each section of the Form and whether it is mandatory or optional. It also provides guidance for the type of information that should be considered when completing the Form or submitting a Consultation Alternative. If you require further assistance please contact the Panel Secretary.

Beverley Viney
01926 653547
beverley.viney@uk.ngrid.co.uk

Amendment Form

CAP:###

- This is the unique reference number allocated to each individual CUSC Amendment Proposal and is completed by the Panel Secretary.

Title of the Amendment Proposal

- This is a mandatory section, which must be completed by the proposer. The title of the Amendment needs to be relevant to the detail and unique.

Handy Hints

- 👍 *Ensure the title is not too long*
- 👍 *Ensure it clearly identifies the Amendments and the issue being raised*
- 👍 *Ensure the title cannot be confused with previous Amendments*

Description of the Proposed Amendment

- This is a mandatory section to be completed by the proposer and should include a detailed description of the Proposed Amendment to ensure the nature and purpose of the Amendment is clear to other CUSC Parties and the Industry.

Description of issue or defect that the Proposed Amendment seeks to address

- This is a mandatory field to be completed by the proposer and should provide a description of the issue or defect in sufficient detail to ensure that is clear to CUSC Parties and the Industry.
- When completing the above sections; the **Description of the Proposed Amendment** and the **Description of the issue or defect**, the proposer should consider the following:
 - Background information and the circumstances surrounding the Amendment
 - Direct and indirect consequences of undertaking or not undertaking the Proposal
 - Identification of external drivers, eg legislation, Ofgem documents and work (i.e. best practice guidelines) and DTI documents
 - Technical aspects of the proposed change.
 - Scenarios or examples to highlight the issue or defect

- Linkages to previous modifications or Ofgem decisions that have been approved or rejected, stating the reasons for the linkage and why this Amendment is required in relation to the previous modification
- Identify any issues which may have an impact on Security of Supply

Handy Hints

- 👉 *Ensure you use clear and plain language*
- 👉 *Ensure the Description of the proposal and the issue/defect can be understood by parties outside the field of expertise*
- 👉 *Avoid the use of jargon and acronyms without a clear explanation*
- 👉 *Where possible, use Glossary's in an attachment*
- 👉 *Ensure What, Why, Benefits and Impact have been addressed*
- 👉 *Depending upon the complexity each section on average should be 3 paragraphs in length in order to provide the required detail*
- 👉 *Look at previous documents such as Amendment Form etc on the website for ideas and expectation of required length*

Impact on the CUSC

- This is an optional section of the Amendment Proposal Form, which should be completed where possible. The proposer should provide an indication of the sections and clauses of the CUSC that would require amendment. If this is not possible, the proposer should aim to indicate the general areas that may be affected.
- In addition, the proposer should aim to provide an overview of the nature of the amendment(s) and its affects.
- The proposer should consider:
 - Impact on relevant code section
 - New definitions within section 11
 - Amend definitions within section 11
 - Impact on Related Agreements – Bilateral, Construction and Mandatory Agreements
 - Impact on Exhibits
 - Providing indicative legal text, if possible **and** where you are confident all aspects and changes are included within the Amendment Proposal Form. To avoid Working Group or Consultation Alternatives just to correct legal text. In addition legal text also need to be comprehensive.

Handy Hints

- 👉 *If you are unsure about the relevant CUSC Section/Clause contact the CUSC Secretary for further assistance*
- 👉 *Look at previous documents such as Amendment Form on the website*

Impact on Core Industry Documentation

- This is an optional section of the form, which should be completed where possible by the proposer. It should include a list of any Codes or Industry Documents that the Amendment Proposal may affect. Where possible the proposer should provide brief details of how each document will be affected
- The proposer should consider impacts upon:
 - BSC
 - Grid Code
 - STC
- If there is an impact consider identifying the effected Sections and Clauses of the document. If this is not possible, the proposer should aim to indicate the general areas.

Impact on Computer Systems and Processes used by CUSC Parties

- This is an optional section of the form that should be completed where possible by the proposer. It should include an initial list of any relevant Computer Systems and Processes that may be affected by the Amendment Proposal. Where possible the proposer should provide brief details of how each System and/or Process may be affected.

Handy Hints

- 👉 *If possible, provide attachments with process flow diagrams explaining the current and new process*

Details of any Related Modifications to Other Industry Codes

- This is an optional section of the Amendment Proposal Form, which should be completed where possible when there are any simultaneous modifications being undertaken in other Industry Documents and Codes. It should include a list of any modifications with the reference number and title.

Handy Hints

- 👉 *Provide a copy of the Modification form etc as an attachment or the web link to the relevant Industry Web Site*

Justification for Proposed Amendment with reference to the Applicable CUSC Objectives

- This is a mandatory field where a proposer must describe how the Proposed Amendment would better facilitate the achievement of the current CUSC objectives compared with the current baseline. These can be summarised as follows:
 - (a) *the efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence; and*
 - (b) *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.*
- The proposer should apply the issue or defect and the proposed solution to one or both of the Applicable Objectives and clearly identify how the proposal will aid the achievement the objectives.

Handy Hints

- 👉 *Clear state how the Amendment will benefit CUSC parties/Industry in relation to the Objectives*
- 👉 *Look at previous documents such as Ofgem decisions, Amendment form etc on the website for ideas*

Attachments

- This is an optional section of the Amendment Proposal Form, which should be used where appropriate. The proposer should ensure all relevant documents and relevant supporting information is submitted with the Amendment Proposal Form.
- Where attachments have been included a list of titles and number of pages for each document should be provided. The attachments should be utilised when it would provide CUSC Parties and the Industry with additional information, which will aid understanding of the issue and/or defect.

For Example:

- Diagrams
- Legal text
- Processes or procedure maps
- Glossary
- Supporting Industry Documents or related modification proposals
- Relevant sections of any driving legislation

Working Group Alternatives Amendments

Working Group Alternative Amendments WGAA can be raised by any Working Group Member during the Working Group discussions and/or prior to the Working Group Report being submitted to the CUSC Amendments Panel.

When proposing WGAA, the proposer must send their Alternative to the Working Group Chairperson and for the avoidance of doubt clearly state that their response is a WGAA.

The WGG should include similar information contained within an Amendment Form.

For example:

- A description of the Alternative Amendment
- Why the proposer believes the original Amendment Proposal is lacking or fails to address the defect.
- Why the proposer believes their WGAA would better facilitate the CUSC Applicable Objectives compared with the original Amendment Proposal

Therefore the guidance and handy hints above for Amendment Form can be utilised, when proposing a WGAA.

Consultation Alternatives Amendments

Consultation Alternative Amendments CAA can be raised by any CUSC Party prior to the closing date for consultation upon any CUSC Amendment.

When proposing a CAA, the proposer must send their Alternative to the CUSC Panel Secretary and for the avoidance of doubt clearly state that their response is a CAA.

The CAA should include similar information contained within an Amendment Form.

For example:

- A description of the Alternative Amendment
- Why the proposer believes the original Amendment Proposal and/or Working Group Alternatives is lacking or fails to address the defect

- Why the proposer believes their CAA would better facilitate the CUSC Applicable Objectives compared with the original Amendment Proposal and/or Working Group Alternatives

Therefore the guidance and handy hints above for Amendment Form can be utilised, when proposing a CAA.