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Email: connections@ofgem.gov.uk

Date: 22 January 2025

Dear Trisha,

**Connection & Use of System Code ("CUSC") Modification Proposals 434 & 435
(together "the CUSC Proposals")**

The System Operator Transmission Owner Code ("STC") Modification Proposal CM095: 'Implementing Connections Reform' ("CM095") has been sent back¹ to the STC Panel. This is to allow further targeted consideration against the updated Applicable STC Objectives ("ASOs") for completeness and to allow the Authority² to properly form an opinion on the Proposal. Given that CM095 is interrelated with the CUSC Proposals, we are writing to the CUSC Panel to share our position on the approach to the CUSC Proposals. If there are any objections to this approach, we expect these to be raised as a matter of urgency.

CM095 was sent back due to the Workgroup vote, Code Administrator consultation ("CAC") and the STC Panel recommendation vote not including reference to the New STC Objective³ and the Amended STC Objective.⁴ This is not the case for the Applicable CUSC Objectives ("ACOs"). Unlike the ASOs for the STC, there are **no additions** to the ACOs for the CUSC following the establishment of National Energy System Operator Limited ("NESO"). As such, we do not consider there to be any value in/need to send back the CUSC Proposals and do not therefore intend to do so. For completeness, we note that the Workgroup vote, CAC, CUSC Panel recommendation vote, and Final Modification Report in respect of the CUSC Proposals contained an inaccurate reference to ACO(a), in referring to "...the Transmission

¹ [Authority decision to send back System Operator Transmission Owner Code \("STC"\) Modification Proposal CM095: 'Implementing Connections Reform' \(CM095\)](#)

² References to the "Authority", "Ofgem", "we", and "our" are used interchangeable in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas Electricity Markets (Ofgem) supports GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.

³ As defined in the CM095 send-back direction.

⁴ As defined in the CM095 send-back direction.

Licence...” rather than “...*this licence [which in practical terms (post establishment of NESO) refers to NESO’s Electricity System Operator Licence] ...*”. We do not consider that this inaccurate reference warrants a send back and will make our assessment on the presumption that the relevant responses are based on ACO(a) referring to NESO’s Electricity System Operator Licence.

Whilst we do not expect there to be any concerns arising from our approach to the CUSC Proposals, if and to the extent that there are any concerns then we expect these to be highlighted to us no later than 29 January 2025 (in keeping with the timescales set out in the CM095 send-back direction).

Yours sincerely,

Jack Presley Abbott
Deputy Director – System Planning and Connections
Duly authorised on behalf of the Authority