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Anthony Pygram

Independent Chair

CUSC & Grid Code Panel

National Energy System Operator

Faraday House, Gallows Hill,

Email: james.stone@ofgem.gov.uk

Warwick,

Date: 19 December 2025

CV34 6DA

Delivered by email.

Dear Anthony,

**Connection and Use of System Code ('CUSC') Modification Proposal CMP466:
'CMP456 consequential Charging Modification' – decision on urgency**

On 2 December 2025, RWE (the 'Proposer') raised CMP466¹ ('the Proposal'). The Proposer subsequently presented CMP466 to the CUSC Modifications Panel (the 'Panel') at its meeting on 12 December 2025, requesting that the Proposal be treated as an urgent CUSC Modification Proposal.

The Panel considered the Proposer's urgency request at its meeting on 12 December 2025. The Panel by majority agreed that CMP466 did not meet Ofgem's Code Modification Urgency Criteria² ('Ofgem's Urgency Criteria') and thus recommended that the Proposal should not be treated as an Urgent CUSC Modification Proposal. Following the Panel

¹ [CMP466: CMP456 Consequential Charging Modification](#)

² [Ofgem Guidance on Code Modification Urgency Criteria](#)

meeting, we³ received a formal request⁴ from the Panel as to whether CMP466 be treated as an urgent modification proposal.

We have considered both the Panel's and the Proposer's arguments. We have decided that CMP466 should not be progressed on an urgent basis. We set out our reasoning below.

Background

The National Energy System Operator ('NESO') performs system studies for both operational and planning purposes. These studies rely on technical modelling (including models provided by generators) to assess system behaviour and aim to ensure that the electricity transmission system remains secure, stable and reliable.

As the generation mix evolves, the network is transitioning from primarily large synchronous generation to a larger number of plants that connect to the grid through Electronic Power Converters (EPCs). This type of plant typically interacts with the network in a different way to that of older generation plant i.e. has different operating and performance characteristics.

On 5 March 2024, the NESO raised Grid Code Modification GC0168: 'Submission of Electromagnetic Transient (EMT) Models' which seeks to require certain users to provide the NESO with EMT models to allow it to assess system behaviour under a range of operating conditions including, system oscillations, inverter instability and voltage issues. While EMT models are typically developed for newer generation assets as part of the commissioning process, many existing transmission-connected generators were built under earlier technical standards and do not currently hold EMT models.

³ References to the "Authority", "Ofgem", "we", and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.

⁴ [CMP466: Urgency request letter](#)

On 29 October 2025, the Proposer raised CMP456⁵ to include a provision within the CUSC to ensure generators which may be required to provide EMT models retrospectively under GC0168 are able to recover these costs. On 12 December 2025, the Proposer subsequently submitted a request⁶ for CMP456 to be treated as an urgent CUSC Modification Proposal.

The Proposal

CMP466 seeks to amend the CUSC to facilitate the implementation of CMP456 by making a change to the Balancing Services Use of System ('BSUoS') 'Charging Methodologies' within Section 14 of the CUSC to allow any validated costs arising via the CMP456 solution to be recovered.

Urgency Request

In its urgency request, the Proposer explained why it was requesting urgency, highlighting one of the three urgency criteria: (a) a significant commercial impact on parties, consumers or other stakeholder(s). The Proposer considers that, without the timely progression of CMP466, generators could be exposed to significant costs arising from changes to the Grid Code that may require retrospective provision of EMT models.

The Proposer states that these costs could place legacy generators in financially unviable positions and that CMP466, together with CMP456, would mitigate this risk. The Proposer further asserts that progressing the Proposal is necessary to support security of supply by enabling the NESO to maintain an accurate system model and allowing generators to keep lower merit order plant in service. To achieve this, they are of the view that CMP466 should progress under an urgent timetable to ensure alignment with CMP456.

Panel View

⁵ [CMP456 Proposal Form.pdf](#)

⁶ [CMP456 Urgency Request Letter v2.0.pdf](#)

The Panel considered the request for urgency by reference to Ofgem's Guidance on Code Modification Urgency Criteria. At its meeting on 12 December 2025 the Panel by majority agreed to recommend to Ofgem that CMP466 should not be progressed as an Urgent Modification Proposal. The full arguments for and against urgent treatment are set out in the urgency request letter from the Panel.

Our decision

In reaching our decision on urgency we have considered the details within the Proposal, the justification for urgency, and the views of the Panel. We have also assessed the request against the urgency criteria set out in our published guidance and whether the Proposal is linked to an imminent or current issue that, if not urgently addressed, may cause a significant commercial impact on users.

We disagree with the Proposer that the Proposal meets the requirements set out in our urgency criteria. The Proposer claims that progressing CMP466 urgently is necessary to avoid a potential gap between the approval of GC0168 and the availability of a cost recovery mechanism, during which existing generators may be required to develop EMT models at cost. These arguments do not establish the existence of an imminent issue requiring urgent action, as CMP466 has no commercial effect in isolation and would only take effect if CMP456 establishes the governance framework and eligibility criteria for cost recovery in respect of an approval of GC0168. It should also be noted that the Proposer's view of the existence of any such gap appears to assume approval of a modification(s) prior to a decision being made.

We note from the information provided, that the GC0168 Proposal (dated 5 March 2024) states that implementation will take place "10 working days after Ofgem Decision" and does not specify a firm implementation date should it be approved. GC0168 also remains in Workgroup stage and based on the current timetable, the Final Modification Report (FMR) is not expected to be submitted to the Authority until June 2026 at the earliest, with the implementation date still to be confirmed and dependent on the Authority's decision. On this basis, it is not clear that CMP466 must be progressed urgently to align with

GC0168 and CMP456, or that there is an imminent risk that generators will incur EMT model costs before these modifications could conclude via a standard timetable.

The Proposer considers that the Proposal relates to an imminent or current issue that, if not urgently addressed, may cause a significant commercial impact. However, CMP466 is a consequential modification intended to introduce a mechanism to recover costs through BSUoS charges if CMP456 and GC0168 are approved. As set out in our decision on urgency for CMP456, we do not consider that the Proposer has quantified or evidenced the materiality of the commercial impact to affected parties. The justification raised in the Proposers urgency instead relies on general statements of potential exposure without supporting analysis being provided and as such has not sufficiently demonstrated that significant commercial impact would arise specifically because of the Proposal following the standard timeline.

We have also considered whether the issue raised in the Proposal was foreseeable. Evaluating whether the Proposal could have been raised sooner and without the need for the urgency process helps us understand whether a matter is truly urgent. As with our decision on CMP456, we note from the information provided that the need for a CUSC modification was identified during the GC0168 Workgroup consultation, indicating that the interaction with the CUSC and requirement for further potential cost recovery modification(s) was recognised at a very early stage. We consider that the Proposer could have therefore raised this modification Proposal at an earlier stage, potentially negating the need for a request for urgency, and the circumstances presented as requiring urgent treatment arise from the timing of the Proposer's actions rather than from an inherent urgency in the issue itself.

We therefore do not grant the Proposal urgency and consider that CMP466 should follow the standard timetable set out in the Panels letter.

For the avoidance of doubt, in making our decision on whether to grant the modification proposal urgent status, we have made no assessment of the merits of the proposal and nothing in this letter in any way fetters our discretion in respect of the proposal.

Yours sincerely,

James Stone

**Head of Electricity Network Charging
Energy Systems Management and Security**

Duly authorised on behalf of the Authority