

Alternative Request Proposal Form	At what stage is this document in the process?
<h1>CMP317/327:</h1> <p>‘Identification and exclusion of Assets Required for Connection when setting Generator Transmission Network Use of System (TNUoS) charges’ and ‘Removing the Generator Residual from TNUoS Charges (TCR)’</p>	<div> <div>01</div> <div>Proposed Alternative</div> </div> <div> <div>02</div> <div>Proposed Workgroup Alternative</div> </div>
<p>Purpose of Alternative:</p> <p>The definition of assets required for connection is</p> <p>as the Original, all local circuits and local substations.</p> <p>Amount to be targeted.</p> <p>As Original, to be within the range set out in EC838/2010.</p> <p>Error Margin</p> <p>Yes, as Original.</p> <p>Phased Implementation</p> <p>Implementation is to be phased over 3 years.</p> <p>Ofgem provided industry with a range of possible implementation dates and therefore it was impossible to reflect this uncertainty within commercial arrangements, specifically Capacity Market Auction bids. The proposed implementation date of 1st April 2021 was given in Ofgem’s November 2019 TCR Decision. This notice was too late for generators that had already been successful in the Capacity Market auction for the 2021/22 delivery year.</p> <p>It is appropriate to phase the implementation of this material change over 3 years, which is consistent to other material network charging reforms such as CMP264/5. Ofgem stated in their decision letter for CMP264/5 that “<i>Allowing a phased introduction of this significant change will provide time for investors and generators to adapt their despatch and business models.</i>”</p>	

There is also credible evidence from respectable trade/industry commentators that clearly shows participants failed to correctly understand Ofgem's determination to set TGR=0. This has led to underestimating the potential impact on generators.

BSC Costs

Yes

Congestion Costs

Yes

Two Step Ex Ante Adjustment





No, As Original

Date submitted to Code Administrator: 31/3/2020

You are: A Workgroup member

Workgroup vote outcome: WACM64

(Should your potential alternative become a formal alternative it will be allocated a reference)

Contents		 Any questions?
1	Alternative proposed solution for workgroup review	3
2	Difference between this proposal and Original	3
3	Justification for alternative proposal against CUSC Objectives	5
4	Impacts and Other Considerations	6
5	Implementation	6
6	Legal Text	6
		 email address
		 telephone
		Alternative Proposer(s): Simon Vicary
		 simon.vicary@edfenergy.com

1 Alternative proposed solution for workgroup review

The definition of assets required for connection is

as the Original, all local circuits and local substations.

Amount to be targeted is

as Original, to be within the range set out in EC838/2010.

Error Margin

Yes, as Original.

Phased Implementation

The implementation would be phased over 3 years, in a similar way to CMP264/5.

BSC Costs

Yes. In accordance with Ofgem's decision on P396, those BSC/Elexon costs which are considered to be network charges that are paid by generators shall be included for the purposes of calculating the annual average transmission charges paid by generators in GB in accordance with the limiting regulation.

'We consider the Main Funding Share and SVA (Production) Funding Share charges recovered via BSC Charges to be network access charges for the purposes of the Electricity Regulation.' ([Ofgem Decision Letter on P396](#)).

Congestion Costs

Yes. As set out in paragraphs 3.1-3.3 of Annex **X 'insert title & date'**, BSUoS costs that are charged to generators, excluding ancillary services, shall be included for the purposes of calculating the annual average transmission charges paid by generators in GB in accordance with the limiting regulation.

Ancillary services are defined in Regulation 2019/944 - Article 2: Definitions (48). 'Ancillary Service' means a service necessary for the operation of a transmission or distribution system, including balancing and non-frequency ancillary services, but not including congestion management. Note that this definition specifically excludes "congestion management".

2 step Ex-ante adjustment

No

2 Difference between this proposal and Original

Definition of assets required for connection.

As Original, all local circuits and local substations.

Amount to be targeted.

As Original, to be within the range set out in EC838/2010.

Error Margin

Yes, as Original.

Phased Implementation

The implementation would be phased over 3 years, in a similar way to CMP264/5.

- In the First Charging year following the implementation date of CMP 317/327 the TGR value used to set generator tariffs will be $\frac{2}{3}$ XTGR with a corresponding adjustment to TDR.
- In the Second charging year following the implementation date of CMP 317/327 the TGR value used to set generator tariffs will be $\frac{1}{3}$ XTGR with a corresponding adjustment to TDR.
- In the Third charging year following the implementation date of CMP 317/327 and every subsequent charging year the TGR value used to set generator tariffs will be zero.
- Where XTGR = Forecast value of generator residual (TGR) for the relevant charging year forecast by the ESO ('The Company') in March 2019 using the Limiting Regulation compliance calculation methodology that was in place in the year prior to implementation of CMP 317/327. i.e. for charging year 2021/22 XTGR = -£5.56/kW and for 2022/23 XTGR = -£6.66/kW BSC Costs

BSC Costs

- In accordance with Ofgem's decision on P396, those BSC/Elexon costs which are considered to be network charges that are paid by generators shall be included for the purposes of calculating the annual average transmission charges paid by generators in GB in accordance with the limiting regulation.
- 'We consider the Main Funding Share and SVA (Production) Funding Share charges recovered via BSC Charges to be network access charges for the purposes of the Electricity Regulation.' ([Ofgem Decision Letter on P396](#)).

Congestion costs

- As set out in paragraphs 3.1-3.3 of Annex X 'insert title & date', BSUoS costs that are charged to generators, excluding ancillary services, shall be included for the purposes of calculating the annual average transmission charges paid by generators in GB in accordance with the limiting regulation.
- Ancillary services are defined in Regulation 2019/944 - Article 2: Definitions (48). 'Ancillary Service' means a service necessary for the operation of a transmission or distribution system, including balancing and non-frequency ancillary services, but not including congestion management. Note that this definition specifically excludes "congestion management".

3 Justification for alternative proposal against CUSC Objectives

Mandatory for the Alternative Proposer to complete.

Impact of the modification on the Applicable CUSC Objectives (Standard):

Relevant Objective	Identified impact
a. That compliance with the use of system charging methodology facilitates effective competition in the generation and supply of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity;	Positive. It fulfils the SCR TCR direction from the Authority to remove the TGR whilst remaining compliant with the Limiting Regulation.
b. That compliance with the use of system charging methodology results in charges which reflect, as far as is reasonably practicable, the costs (excluding any payments between transmission licensees which are made under and accordance with the STC) incurred by transmission licensees in their transmission businesses and which are compatible with standard licence condition C26 requirements of a connect and manage connection);	neutral
c. That, so far as is consistent with sub-paragraphs (a) and (b), the use of system charging methodology, as far as is reasonably practicable, properly takes account of the developments in transmission licensees' transmission businesses;	Positive. It fulfils the SCR TCR direction from the Authority to remove the TGR whilst remaining compliant with the Limiting Regulation.
d. Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency. These are defined within the National Grid Electricity Transmission plc Licence under Standard Condition C10, paragraph 1 *; and	Positive. It fulfils the SCR TCR direction from the Authority to remove the TGR whilst remaining compliant with the Limiting Regulation.
e. Promoting efficiency in the implementation and administration of the CUSC arrangements.	neutral
*Objective (d) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).	

The Authority has directed CMP327 to be raised and implemented to enact their SCR TCR Decision in conjunction with CMP317.

4 Impacts and Other Considerations

This proposed alternative will impact the same parties, systems and processes as the original. Generators that pay TNUoS will be highly impacted, although less materially than the original solution.

Consumer Impacts

Consumer TNUoS values may be affected as where Generator TNUoS increases/decreases there is a commensurate decrease/increase in Demand TNUoS. This impact is likely to be less than the original.

5 Implementation

Phased Implementation

The implementation would be phased over 3 years, in a similar way to CMP264/5.

- In the First Charging year following the implementation date of CMP 317/327 the TGR value used to set generator tariffs will be $\frac{2}{3}$ XTGR with a corresponding adjustment to TDR.
- In the Second charging year following the implementation date of CMP 317/327 the TGR value used to set generator tariffs will be $\frac{1}{3}$ XTGR with a corresponding adjustment to TDR.
- In the Third charging year following the implementation date of CMP 317/327 and every subsequent charging year the TGR value used to set generator tariffs will be zero.
- Where XTGR = Forecast value of generator residual (TGR) for the relevant charging year forecast by the ESO ('The Company') in March 2019 using the Limiting Regulation compliance calculation methodology that was in place in the year prior to implementation of CMP 317/327. i.e. for charging year 2021/22 XTGR = -£5.56/kW and for 2022/23 XTGR = -£6.66/kW

6 Legal Text

To be drafted by the workgroup and ESO.