

CUSC Code Administrator Consultation Response Proforma**CMP324/5 Generation Zones – changes for RIIO-T2 and Rezoning – CMP324 expansion**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to cusc.team@nationalgrideso.com by **5pm on 24 June 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Panel.

If you have any queries on the content of this consultation, please contact Joe Henry joseph.henry2@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Christopher Granby
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For reference the applicable CUSC objectives are:

- 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;*
- 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);*
- 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;*
- 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*
- Promoting efficiency in the implementation and administration of the CUSC arrangements.*

**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).*

Please express your views in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions		
1	Do you believe that the CMP324/5 Original solution, WACM1, WACM2 or WACM3 better facilitates the Applicable CUSC Objectives?	<p>It is our belief that either the “original solution” or WACM3 provide the best opportunity to facilitate the Applicable CUSC Objectives.</p> <p>It is our belief that the CUSC and associated rules are already overly complex and anything which brings simplicity should be welcomed. As such we support the proposal that provides the most clarity and simplicity while retaining some measure of cost reflectivity</p> <p>We believe that WACM3 provides the identical outcome but can see that there is some merit in having a more orderly implementation over a long period rather than implementing in early 2021</p>
2	Do you support the proposed implementation approach?	We are comfortable with the proposed implementation approach
3	Do you have any other comments?	<p>We wish to be very clear that we believe that the baseline is an untenable and all four of the options provide a superior outcome than leaving the current system as is.</p> <p>We note strong support within the workgroup for WACM1 and we would also be content for this approach to be taken. We do have concerns that it is not “future proof” and that the same issue of excessive zones could re-appear in years to come.</p> <p>WACM2 feels more arbitrary and if we are to move to fixed zones, we would prefer that they aligned with the DNO areas.</p>