

CUSC Code Administrator Consultation Response Proforma**CMP335 & CMP336 - Transmission Demand Residual, billing and consequential changes to CUSC**

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 **22 September 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 paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details
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CMP335

For reference the applicable CUSC non-charging objectives are:

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- 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;*
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- Promoting efficiency in the implementation and administration of the CUSC arrangements.*

**Objective (c) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).*

CMP336

For reference the applicable CUSC Charging 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);

- 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;*
- 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*
- e. Promoting efficiency in the implementation and administration of the use of system charging methodology.*

**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.

CMP335 - Standard Code Administrator Consultation questions		
1	Do you believe that the CMP335 Original solution better facilitates the Applicable CUSC Objectives?	<p>Yes. We believe CMP335 will have a positive impact against the non-charging CUSC applicable objectives (A) and (D).</p> <p>Objective (A), CMP335 ensures that the CUSC remains in line with the Transmission Licence obligations following the Authority's TCR decision.</p> <p>Objective (D), CMP335 creates a process for the efficient integration of site data in timescales consistent with Ofgem's TCR decision together with a disputes process.</p>
2	Do you support the proposed implementation approach for CMP335?	<p>Whilst we support this approach in general, we do have concerns regarding implementing the TCR in April 2022.</p> <p>Given the unforeseen and ongoing impacts of COVID-19 we know that our business customers will find it difficult to manage TCR implications within these timescales and would therefore strongly recommend a TCR implementation date of April 2023.</p> <p>We note the workgroup concern of potential interaction with CMP317/327. It may be necessary to raise future modifications, so believe it more appropriate and efficient for the implementation date of CMP317/327 to be April 2023 also.</p>

3	Do you have any other comments for CMP335?	No.
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CMP336 - Standard Code Administrator Consultation questions

1	Do you believe that the CMP336 Original solution, WACM1 or WACM2 better facilitates the Applicable CUSC Charging Objectives?	<p>Yes. We believe that the CMP336 Original solution has a positive impact against CUSC charging objectives A, B, C and E as the proposal ensures the CUSC remains in line with implementation of the Authority's TCR decision.</p> <p>We favour the simplicity of the Original Solution over WACM1 and question the need for a review given that there are only a small number of transmission sites to be monitored by NGENSO on an ongoing basis.</p> <p>With WACM 2, we are concerned with estimates being provided for the Final Demand Site to be used for the purposes of allocating the site to a Charging Band. This carries a risk of error/gaming and is inefficient because the National Grid ESO will need to monitor the actual metered data from the Final Demand Site.</p>
2	Do you support the proposed implementation approach for CMP336?	<p>Whilst we support this approach in general, we do have concerns regarding implementing the TCR in April 2022.</p> <p>Given the unforeseen and ongoing impacts of COVID-19 we know that our business customers will find it difficult to manage TCR implications within these timescales and would therefore strongly recommend a TCR implementation date of April 2023.</p>
3	Do you have any other comments for CMP336?	No.