

Workgroup Consultation Response Proforma**CMP363: 'TNUoS Demand Residual charges for transmission connected sites with a mix of Final and non-Final Demand & Definition changes for CMP363'****CMP364: Definition changes for CMP363**

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 1 June 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation, please contact Paul Mullen paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
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CMP363 - 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);*
- 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; and*
- Promoting efficiency in the implementation and administration of the 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).*

CMP364 - For reference the Applicable CUSC (non-charging) Objectives are:

- a) *The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- b) *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;*
- c) *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- d) *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).*

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

CMP363

Standard Workgroup Consultation questions – CMP363		
1	Do you believe that the CMP363 Original Proposal better facilitates the Applicable Objectives?	<p>Yes. Specifically the following two objectives.</p> <p>Objective a) Positive. This proposal delivers on Ofgem's intent to allow more effective competition in the generation and supply of electricity</p> <p>Objective e) Positive. This proposal satisfies the clarity of the TNUoS charge liabilities applicable to complex site configurations.</p>
2	Do you support the proposed implementation approach?	<p>Yes.</p> <p>The various scenarios tested on complex site configurations shows that the implementation approach has been robustly considered.</p> <p>It delivers to Ofgem's complex charging reform intent that any site that can demonstrate that it has "non-final demand" will not have this volume included as a chargeable component towards their TNUoS liability. (i.e. Final Demand Sites will be allocated to a Charging Band based only on their combined Final and Mixed Demand, with 'pure' Non-Final Demand excluded from the calculations).</p>
3	Do you have any other comments?	Click or tap here to enter text.
4	Do you wish to raise a Workgroup	No.

	Consultation Alternative Request for the Workgroup to consider?	
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CMP364

Standard Workgroup Consultation questions – CMP364		
1	Do you believe that the CMP364 Original Proposal better facilitates the Applicable Objectives?	Click or tap here to enter text.
2	Do you support the proposed implementation approach?	Click or tap here to enter text.
3	Do you have any other comments?	Click or tap here to enter text.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Click or tap here to enter text.

CMP363 and CMP364 Specific questions

Modification Specific Workgroup Consultation questions		
5	The Workgroup does not believe there are any Grid Code or BSC requirements that would prohibit the CMP363/364 Original Proposal. Do you agree or do you believe that any other consequential code	We agree, that we are unaware of any other code requirements that will prohibit these proposals.

	changes are required to facilitate this change? Please provide the rationale for your response.	
6	The Workgroup has assessed the practicalities of the proposed solution against a number of different scenarios, which are represented diagrammatically in Annex 4. Do you agree with the Workgroup's initial assessment and do you believe there are any other scenarios that need to be tested?	We believe the workgroup has been thorough in testing various scenarios.
7	Do you believe that the Metering should be Settlement Metering (as per the Original proposal) or Operational Metering? Please provide the rationale for your response including if possible, any implementation costs.	<p>We believe Settlement quality metering which is accurate should be the baseline.</p> <p>There may be some exception circumstances where operational metering may be required. Therefore we should not dismiss this out-right but strive for settlement quality metering when possible.</p>
8	The Proposer has noted that the definition of Declaration does not need to change. Do you agree? Please provide the rationale for your response.	<p>Yes.</p> <p>There is a practical and workable solution already available which can be adopted for declaration of "non-final" demand.</p>
9	The Proposer has set out what they believe should be contained in any Declaration. Do you agree? Please provide the rationale for your response.	Yes. We believe the information request is reasonable to provide the necessary assurance required.
10	Will the CMP363 and/or CMP364 Original Proposal	There will be nothing that will impact our business significantly. These proposals can be categorised as business as usual process changes.

	impact your business. If so, how?	
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