

Code Administrator Consultation Response Proforma**CMP308: Removal of BSUoS charges from Generation**

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

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

Respondent details	Please enter your details
Respondent name:	Caroline Bragg
Company name:	Association for Decentralised Energy
Email address:	Caroline.bragg@theade.co.uk
Phone number:	Click or tap here to enter text.

I wish my response to be:

(Please mark the relevant box)

☒ Non-Confidential

☐ Confidential

Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

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.*

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 CMP308 Original Proposal better facilitates the Applicable Objectives?	The ADE supports removal of BSUoS from Generators alongside reform to move to a fixed tariff set in advance.
2	Do you support the proposed implementation approach?	<p>The ADE has concerns that this could create windfall gains for GB Generators if implemented too quickly. The ADE supports the view of workgroup members who have argued for Ofgem to assess fully the volume of contracts already in place by suppliers with generators that could be impacted by this. If this volume is significant, implementation should be pushed back beyond the proposed 1st April 2023.</p> <p>The ADE supports the workgroup's view that a final decision on this by Ofgem should only be taken once the impacts and any mitigating action on the price cap have been fully explored.</p> <p>Noting that there have been some difficulties with the non-final demand declaration submission this year, the ADE nonetheless supports using this existing process as far as possible for these changes. It would be overly onerous for participants if they were required to make non-final demand declarations separately for this modification.</p>
3	Do you have any other comments?	N/A