

Workgroup 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 **26 April 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 Kavita Patel Kavita.Patel@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Michelle Fong
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For reference the Applicable CUSC Objectives are:

- 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;*
- 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);*
- c) *That, so far as is consistent with subparagraphs (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 *; and*
- e) *Promoting efficiency in the implementation and administration of the system charging methodology*

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

Standard Workgroup Consultation questions		
1	Do you believe that CMP308 Original proposal better	Yes. The proposed approach will better align the UK market arrangements with the EU countries where generation is typically not subject to such charges. It

	facilitates the Applicable Objectives?	<p>will harmonise the market conditions between the UK and EU countries thereby strengthening our ability to compete with the EU market.</p> <p>Further, the implementation of CMP308 will reduce the disparity currently prevalent within the UK internal market between distribution and transmission connected assets.</p> <p>The implementation of CMP308 will also reduce the administrative burden placed on each generation asset which is currently very high. This change will simplify the charging and billing arrangements, thus simplifying administration.</p> <p>Total BSUoS charges will still recover the same underlying costs, but will do so in a way that does not distort competition.</p> <p>The consumer impacts in the short-term would be neutral.</p>
2	Do you support the proposed implementation approach?	Yes.
3	Do you have any other comments?	Not at this time.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Not at this time.
Modification Specific Workgroup Consultation questions		
5	Please provide your thoughts on the Workgroup's discussions post reconvening after the outcome of the Second Balancing Services Charges Task Force. Is there anything else that the Workgroup may need to consider?	No comment.
6	What are your thoughts on the workgroup's discussions in regard	No comment.

	to final demand data? Do you think the suggested solutions are appropriate? Please provide your rationale	
7	What are your thoughts on the draft legal text outlined in Annex 3? Please provide any comments you may have.	No comment.