

Code Administrator Consultation Response Proforma**CMP382: Amend the terminology used in CUSC Section 14 to align with the definitions of 'Financial Year' and 'Business Day' within CUSC Section 11**

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 11 March 2022**. 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 Paul Mullen Paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Lauren Jauss
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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;*

- 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.*

*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 CMP382 Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe the Original Solution each solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> </table> <p>No</p>	Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E
Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E			
2	Do you support the proposed implementation approach?	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>We agree it is very important to provide clarity to CUSC parties by clearly defining CUSC terms.</p> <p>We agree with the proposed definition and use of the term “Business Day”.</p> <p>However, we believe using the term “Financial Year” to describe charging years will be confusing for CUSC parties and do not agree with this part of the proposal.</p> <p>We believe it would be clearer to continue to use the term Charging Year (from Section 14.3.21 onwards) to describe the period over which annual charges to CUSC parties are fixed, and that this should be properly defined.</p> <p>Even though the charging year for TNUoS happens to be aligned with National Grid’s financial year and the RIIO-2 periods of allowed revenue, it does not appear to be aligned with Scottish Power’s financial year. The Gas Charging Year is also not aligned with National Grid’s financial year. Hence we think it is confusing to interchange charging year for Financial Year in the CUSC.</p> <p>Also, Financial Year is a very commonly used term, and financial years differ depending on which entity is being</p>						

		referred to. This means that whenever the term “The Financial Year” is used in an industry context, it would need to be accompanied with a note to explain which one. However the “Charging Year” will have a common and immediately understandable meaning within the electricity industry.
3	Do you have any other comments?	No