

Code Administrator Consultation Response Proforma**CMP288: Explicit charging arrangements for customer delays and backfeeds**

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 18 July 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 Jennifer Groome Jennifer.Groome@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Andy Vaudin
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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;*
- 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.*

***The Electricity Regulation referred to in objective (d) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.*

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 Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe Original 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>The Original Proposal <u>does not</u> better facilitate the objectives, because there is no detail on the delay charging methodology set out in the CUSC with this proposal. This proposal enables TO Charging Statements, or other means outside of the CUSC, to impose delay charging methodologies. These TO Charging Statements have very different levels of detail on delay charges for each TO, and importantly are not subject to open-governance.</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 do not support the current implementation approach, for the following reasons:</p> <ul style="list-style-type: none"> • Detail on the delay charging methodology should be set out in the CUSC, which is subject to industry open-governance. • This approach would leave it for TO Charging Statements, or other means, to impose delay charging methodologies. • These TO charging statements are amended annually by the individual TO. They are not subject to industry review. • The Scottish and England/Wales TOs currently have very different levels of detail on delay charges in their Charging Statements. • There should be a mechanism to address delay charges associated with shared and wider works. Ideally the charges should be “shallow” and only reflect a user’s contribution to the need for the works. In this proposal, the first party to delay would be hit with delay costs associated with all of the works. • Detail should be provided in the CUSC on the degree to which charges might apply retrospectively following implementation of this modification. This is not clear in the proposal. • The proposal does not include a requirement for the TO/ESO to regularly inform users of actual and forecast 						

		spend on connection works, allowing the users to assess potential delay charge liabilities. This should be included in the CUSC text.
3	Do you have any other comments?	There should be a mechanism to address delay charges associated with shared and wider works. Ideally the charges should be “shallow” and only reflect a user’s contribution to the need for the works. In this proposal, the first party to delay would be hit with delay costs associated with all of the works.