

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
Respondent name:	Tom Chevalier
Company name:	Association of Meter Operators
Email address:	AMO@PowerDataAssociates.com
Phone number:	01525 862870

CMP363 - For reference the Applicable CUSC (charging) 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 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).*

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?	If Ofgem require mixed use sites to be treated differently, then yes.
2	Do you support the proposed implementation approach?	No comment
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No

CMP364

Standard Workgroup Consultation questions – CMP364		
1	Do you believe that the CMP364 Original Proposal better facilitates the Applicable Objectives?	If Ofgem require mixed use sites to be treated differently, then yes.
2	Do you support the proposed implementation approach?	No comment
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No

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 changes are required to facilitate this change? Please provide the rationale for your response.	Not sure
6	The Workgroup has assessed the practicalities of the proposed solution against a number of different scenarios, which are represented diagrammatically in	They cover the broad scenarios. There will be sites with a combination of these scenarios. The use of Settlement quality metering would result in a series of BSC Dispensation requests as many of the existing metering point of connection metering embedded within a site will not meet the BSC requirements. In addition, many of these connections will be at a different voltage to the

	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?	boundary point supply, which will require further complexity to adjust the losses to the boundary point. The requirement of the TCR to put the site into Bands does not justify this addition cost or complexity.
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>The provision of data from the operational metering equipment should be sufficient to allow the determination of which band to allocate the site. The boundary metering is then used to determine the site costs. How the boundary point stakeholder and their embedded customer determine their respective costs is a commercial issue for them to determine. There should be no need to increase the costs for participants to require expensive and complex metering (and associated data collection) to satisfy the TCR objectives.</p> <p>The BSC metering option will impose costs on the BSC Parties for managing, auditing and considering Dispensations to the BSC obligations. This seems an unfair cost to share when the benefits of the proposal rest with a smaller number of sites (70). The operational metering solution allows for the Sites to bear the costs directly and to provide sufficient evidence the ESO to demonstrate the appropriate banding. The 'trust model' is already being used for final demand declarations so should be equally applicable to the banding.</p> <p>The site operator can be tasked with providing behind the boundary consumption data. Which is not time critical as the only use of the data is the allocation of banding. The behind the meter consumption data is not used directly for any Transmission charge billing.</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>The workgroup discussed inclusion of the consequences of an incorrect statement on the Declaration such that the Direct is fully aware of the need for accuracy.</p> <p>Similarly there should be a 'hook' to allow for subsequent audit/validation or evidence to emerge which brings the Declaration into challenge. The ESO should retain the ability to investigate and change their view based on any new information. The DUoS and TUoS are fundamentally different so there will not be absolute consistency of approach.</p>
9	The Proposer has set out what they believe	See answer to Q8

	should be contained in any Declaration. Do you agree? Please provide the rationale for your response.	
10	Will the CMP363 and/or CMP364 Original Proposal impact your business. If so, how?	Not as a trade association