

Code Administrator Consultation Response Proforma**CMP315: TNUoS Review of the expansion constant and the elements of the transmission system charged for and****CMP375: Enduring Expansion Constant & Expansion Factor Review**

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 15 December 2023**. 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 Andrew Hemus Andrew.Hemus@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Graeme Vincent	
Company name:	SP Transmission	
Email address:	graeme.vincent@spenergynetworks.co.uk	
Phone number:	Click or tap here to enter text.	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input checked="" type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

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);

- 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.

****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	Please provide your assessment for the proposed CMP315 solution against the Applicable Objectives?	<div>Mark the Objectives which you believe the proposed solution better facilitates:</div> <div>Original <input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input type="checkbox"/>E</div> <div>As there are still gaps on what additional data is required to be provided by the Transmission Owners and the complexity of the revised methodology it is unclear whether these modifications provide an overall better solution.</div>
2	Please provide your assessment for the proposed CMP375 solutions against the Applicable Objectives?	<div>Mark the Objectives which you believe the proposed solutions better facilitates:</div> <div>Original <input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input type="checkbox"/>E</div> <div>WACM2 <input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input type="checkbox"/>E</div> <div>As there are still gaps on what additional data is required to be provided by the Transmission Owners and the complexity of the revised methodology it is unclear whether these modifications provide an overall better solution.</div>
3	Do you have a preferred proposed solution?	<div> <input type="checkbox"/>CMP315 Original <input type="checkbox"/>CMP375 Original <input type="checkbox"/>WACM2 <input checked="" type="checkbox"/>Baseline <input type="checkbox"/>No preference </div> <div>Click or tap here to enter text.</div>

4	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		The additional data requirements and process changes required from/by Transmission Owners is as yet unquantified and as such presents an additional but unknown resource requirement with potential additional cost impacts for TOs. Whilst these data exchanges will be identified through a consequential change to the System Operator – Transmission Owner Code (STC) – the data items required should be identified as part of these modifications and an assessment of the impact on affected parties considered. Otherwise, the TOs could be left with an obligation to provide this additional information with the additional overheads that this may attract. Raising the consequential STC modification following the development of the solution is too late in the process for the full impact of the CUSC modifications to the wider industry to be considered.
5	Do you have any other comments?	Click or tap here to enter text.