

16 May 2022

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To Whom It May Concern,

### **About Red Rock Power**

Red Rock Power Limited is an investor, owner, developer and operator of renewable energy projects, headquartered in Scotland. Our project portfolio currently includes five part and fully owned wind projects, with approximately 2GW installed or in late-stage development.

We are continuing to grow our UK wind portfolio and pursue development and acquisition opportunities. While our expertise lies in the UK wind sector, we are expanding further into the European market and other sustainable energy technologies.

### **Red Rock Power Submission to CMP315: TNUoS Review of the Expansion Constant and the Elements of the Transmission System Charged for and CMP375: Enduring Expansion Constant & Expansion Factor Review**

We believe that the current TNUoS charging regime is not fit for purpose – it was designed for a system comprising of large, centralised, fossil fuel power plants. This does not tally with the future of the GB electricity grid, which will include a higher percentage of variable renewable generation, and smart, decentralised generation assets. Currently TNUoS charges are too high (particularly for generators in Scotland and the North of England), too volatile, and too unpredictable. The TNUoS charging methodology is also too complex and is almost impossible for generators to understand without the support of the grid technical experts. The current regime will hinder investment in new renewables and slow our progress towards net zero.

We have concerns that the proposals of CMP315 and CMP375 could have material impacts on TNUoS which could potentially drive a significant increase in TNUoS for transmission connected generators in Scotland, which will widen any disparity which already exists under the current arrangements. With the complexity of the topic, it is difficult for us to estimate the financial impacts of CMP315 and CMP375 on our existing and development assets. We therefore believe that more detailed impact analysis should be provided to allow generators to understand the impacts of the various proposals on TNUoS tariffs, and on the differential in tariffs from north to south GB. The potential increase in TNUoS tariffs and in the charge disparity will further undermine investor confidence, particularly for generation assets in Scotland where the UK can harvest the rich wind resources to help reach the net zero target.

We believe that it is time to move to a simpler model of charging which delivers stable, proportionate charges, and which is better designed to ensure the optimal energy mix to deliver net zero at the lowest cost to consumers. We are supportive to a wider TNUoS reform. We would also urge any review to assess and address any distortions created for 132kV-connected generators in Scotland as a result of this voltage being categorised as transmission in Scotland but as distribution in England and Wales.

Yours sincerely,

*Michelle Fong*

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