

**Workgroup Consultation Response Proforma****CMP418: Refine the allocation of Dynamic Reactive Compensation Equipment (DRCE) costs at OFTO transfer.**

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](mailto:cusc.team@nationalgrideso.com) by **5pm** on **22 JANUARY 2024**. 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 [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com)

| Respondent details                             | Please enter your details  |  |
|--|--|--|
| <b>Respondent name:</b>                        | Harvey Takhar  |  |
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| <b>Phone number:</b>                           | 07707 176265   |  |
| <b>Which best describes your organisation?</b> | <input type="checkbox"/> Consumer body<br><input type="checkbox"/> Demand<br><input type="checkbox"/> Distribution Network<br><input type="checkbox"/> Operator<br><input type="checkbox"/> Generator<br><input type="checkbox"/> Industry body<br><input type="checkbox"/> Interconnector | <input type="checkbox"/> Storage<br><input type="checkbox"/> Supplier<br><input checked="" type="checkbox"/> System Operator<br><input type="checkbox"/> Transmission Owner<br><input type="checkbox"/> Virtual Lead Party<br><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:**

- 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.*

*\*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 Workgroup Consultation questions |  |   |
|---|--|---|
| 1   | Do you believe that the Original Proposal better facilitates the Applicable Objectives?          | <div>Mark the Objectives which you believe the Original Proposal better facilitates:</div> <div>Original <input checked="" type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input checked="" type="checkbox"/>E</div> <div>This modification, if passed, would better facilitate than baseline for objectives A &amp; E, but would be neutral regarding objectives B, C &amp; D. The mod seeks to recognise in the approach to charging, the broader benefits that DRCE could provide to the onshore system.</div> |
| 2   | Do you support the proposed implementation approach?   | <div><input checked="" type="checkbox"/>Yes</div> <div><input type="checkbox"/>No</div> <div>In support of the implementation approach</div>  |
| 3   | Do you have any other comments?  | n/a   |
| 4   | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | <div><input type="checkbox"/>Yes</div> <div><input checked="" type="checkbox"/>No</div> <div>Click or tap here to enter text.</div>   |

| Specific Workgroup Consultation questions |  |   |
|---|--|---|
| 5   | In regard to the ongoing DRCE operation and maintenance costs, is a value of 1.5% the value used for onshore | <div><input checked="" type="checkbox"/>Yes</div> <div><input type="checkbox"/>No</div> <div>It was evident in workgroup discussions that there was a lack of data on these operation and maintenance costs specifically for DRCE. Using the 1.5% for other onshore</div> |

|   |  |  |
|---|--|--|
|   | price control, an appropriate value?   | transmission equipment that is the overhead factor in RIIO-T2, seems reasonable in the lack of better data.  |
| 6 | Do you agree the solution should apply to existing relevant windfarms from the implementation going forward from the next charging period after implementation, and should not be applied retrospectively? | <div><input checked="" type="checkbox"/> Yes<br/><input type="checkbox"/> No</div> <div>This avoids re-opening charges for any user for previous years to that described. The supporting analysis paper to the mod proposal as raised assumed the mod would only apply to brand new installations going forward, not to any existing relevant wind farms, so it will understate the costs relating to this mod as now developed/defined and as described in this question.</div> |