

CMP316 Workgroup Consultation Summary

Overview

- 8 non-confidential responses were received.
- 6/8 respondents believed that the modification better facilitates the applicable objectives, and supported the implementation approach. Positive effects on objectives A, B, C and E were seen.
- 2/8 did not believe the modification better facilitates the objectives. Negative effects on objectives A, B, C and E were seen.
- No alternative requests were made.
- 7/8 respondents thought it was appropriate for the MFSSTEC for each technology type to be published on the TEC register. 1/8 did not make a selection.
- 7/8 respondents preferred 'installed capacity' to be sourced from the connection agreement. 1/8 preferred the declarations route.

Comments on implementation

- Need clarity on implementation – how it affects existing and future co-located sites.
- Billing and invoicing of MFSSTEC needs to be clear.
- More clarity needed re obligations for separate BMU/Metering for each technology and the applicability of the MFSSTEC methodology.
- The proposed implementation date of 01/04/2023 is deemed reasonable as this aligns with the upcoming TNUoS charging year, however this will only leave NGESO 6 months from decision to implementation, which could be challenging.

Issues identified

- One respondent believed the current defect to not be as material as the defect the mod would create.
- Not clear that solution addresses the issue. There is an issue with the solution in respect of the peak charge when conventional and intermittent plant share TEC, plus the Not Shared Year-Round charge when low carbon and carbon plant share a TEC (example given in response).
- One respondent believed that this modification would introduce a new defect by giving some sites the opportunity to significantly reduce their TNUoS charges where site TEC can be shared across different co-located technology types. Concerned that the current TNUoS arrangements are well not designed for batteries which are used on most sites as the secondary technology. Concerned that this proposal will result in an increase in battery capacity liable for TNUoS Charges based on the current Conventional Carbon tariff. The mod would introduce complexity. Believes the charging arrangements for batteries and co-located generation sites should be reviewed through a TNUoS Review, the Taskforce and/or the SQSS Review.
- One respondent believed the mod will benefit co-located sites in Scotland (year round tariffs) with wind as the secondary tech.

Publishing MFSSTEC on TEC register

- It was generally agreed that publishing the MFSSTEC on the TEC register would be beneficial in terms of transparency. However, one respondent stated there would be confidentiality issues in relation to publishing the MFSSTEC for each tech type on the TEC register for co-located assets.

Declarations vs Contracts

- Most respondents believed the declarations route would lead to an increased admin burden and potential for less accurate data than sourcing from contracts.
- Suggested use of the unit CEC for installed capacity in Connection Agreement. Concern if there is not a suitable figure within the Connection Agreement to use.
- One believed that Registered Capacity is already available to the ESO to source 'installed capacity'.
- One respondent supported the declaration (and redeclaration) route to capture varying situations at a site which may be different to what was set out in the Connection Agreement originally.