

Workgroup Consultation Response Proforma

CMP430 Adjustments to TNUoS Charging from 2025 to support the Market Wide Half Hourly Settlement (MHHS) Programme

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 24 April 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

Respondent details	Please enter your details	
Respondent name:	Tom Chevalier	
Company name:	N/A	
Email address:	Tom@Chevalier.me.uk	
Phone number:	07768 464223	
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 type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input checked="" type="checkbox"/> Other

I wish my response to be:
 (Please mark the relevant box)

- Non-Confidential** (*this will be shared with industry and the Panel for further consideration*)

- Confidential** (*this will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration*)

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.*

For reference, (for consultation questions 5 & 6) the Electricity Balancing Regulation (EBR) Article 3 Objectives and regulatory aspects are:

- a) fostering effective competition, non-discrimination and transparency in balancing markets;*
- b) enhancing efficiency of balancing as well as efficiency of national balancing markets;*
- c) integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
- d) contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;*
- e) ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;*
- f) facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;*
- g) facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.*

What is the EBR?

The Electricity Balancing Regulation (EBR) is a European Network Code introduced by the Third Energy Package European legislation in late 2017.

The EBR regulation lays down the rules for the integration of balancing markets in Europe, with the objectives of enhancing Europe's security of supply. The EBR aims to do this through harmonisation of electricity balancing rules and facilitating the exchange of balancing resources between European Transmission System Operators (TSOs). Article 18 of the EBR states that TSOs such as the ESO should have terms and conditions developed for balancing services, which are submitted and approved by Ofgem.

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 and/or any potential alternatives better facilitate the Applicable Objectives?	Mark the Objectives which you believe each solution better facilitates:
		Original <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/> E
		Not able to judge D
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
3	Do you have any other comments?	Click or tap here to enter text.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		Click or tap here to enter text.
5	Do you agree with the Workgroup's assessment that MOD430 does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the CUSC	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Unable to judge
6	Do you have any comments on the impact of MOD430 on the EBR Objectives?	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Unable to judge

Specific Workgroup Consultation questions		
7	Does the Original Proposal have an impact on your business and if so, to what extent? e.g., Consumers treated differently in new arrangements?	As a personal individual I believe that the for CT metered supplies the charges should be the same for Domestic and Non-Domestic customers. Similarly whole current customers should be charged on the same basis. Making a distinction for CT will lead to lots of customer/supplier discussions about whether they shall be perceived as domestic or non-domestic. There are many

		<p>customers which are not clear about whether they are domestic or non-domestic customer, such as:</p> <ul style="list-style-type: none"> • Farms – farm building and farm housing • Large ‘footballer’ houses – may be domestic use, but in the name of a management company • Landlord supplies to muti-occupancy dwellings • Single CT supplies to multi-occupancy domestic residences • Care homes, shelter accommodation, etc. <p>The BSC & DCUSA are creating schemes where energy can be shared between CT metered premises and whole current premises. Making these distinctions will further confusing the charging arrangements.</p> <p>If there is a material financial difference, then consultants will seek to exploit any benefit. Creating an administrative burden and potential conflict for customers and suppliers.</p>
8	<p>Does the Original Proposal have an impact on the systems and processes used by your organisation, and if so, to what extent? e.g., pricing, billing, settlement</p>	N/A
9	<p>Do you agree with the scenarios identified that could be subject to different charging arrangements as a result of CMP430?</p>	Not for the Domestic CT customers as stated above
10	<p>For suppliers only: How many sites does your organisation supply in the following scenario:</p>	<p><input type="checkbox"/> a) Sites that are settled as Measurement Class C pre-MHHS migration that will have Domestic Premises Indicator = True post-MHHS migration</p> <p><input type="checkbox"/> b) Sites that are settled as Measurement Class A pre-MHHS migration that will have a Connection Type Indicator = L or H (meaning they are CT Metered) and a Domestic Premises Indicator = False post -MHHS migration.</p> <p>N/A</p>

<p>11</p>	<p>Do you agree that the Original Proposal should be considered as enduring, or do you believe should it be time limited – e.g., Linked to Market Wide Half Hourly Settlement Milestones?</p>	<p>The application of TUoS charges is already subject wider review. The wider review should implement any further enduring changes. The framework proposed under CMP430 can exist until the outcome of the wider review. The wider review can then determine whether it is necessary to segment consumption/charges in these same segments which reflect historic practices which were constrained by the segmentation available in the pre-MHHS settlement arrangements. MHHS gives far greater opportunity to segment differently, such as the use of the Connection Type, or not at all.</p>
<p>12</p>	<p>Do you agree that the Original Proposal will not impact the delivery of the MHHS Programme delivery Milestones?</p>	<p>Yes agree</p>