

CUSC Code Administrator Consultation Response Proforma

CMP320 – Island MITS Radial Link Security Factor

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 by **20 January 2020** to cusc.team@nationalgrideso.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the CUSC Modifications Panel when it makes its final determination.

These responses will be included in the Final CUSC Modification Report which is submitted to the CUSC Modifications Panel.

Respondent:	<i>Grahame Neale</i>
Company Name:	<i>National Grid ESO</i>
Do you believe that the proposed original or any of the alternatives better facilitate the Applicable CUSC Objectives (ACO)? Please include your reasoning.	<p>For reference, the Applicable CUSC objectives (Charging) are:</p> <ul style="list-style-type: none"> (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. These are defined within the National Grid Electricity Transmission plc Licence under Standard Condition C10, paragraph 1 *; and (e) Promoting efficiency in the implementation and administration of the CUSC arrangements.

	<p>*Objective (d) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).</p> <p><i>We believe all the options presented as part of CMP320 are better than the current baseline as they more accurately align the TNUoS charges with the 'level of service' these generators receive from the Transmission System in the instances that there is only 'one route' between a MITS Node and the 'wider network' (such as a remote island), Therefore, all the options presented benefit ACO A, B and C. We don't believe CMP320 effects ACO D or E.</i></p> <p><i>In terms of the options directly, we believe WACM1 provides the most benefit as it solves the defect specifically for remote islands whilst also providing additional benefits beyond the scope of the defect.</i></p> <p><i>WACM2 and the Original provide an equivalent level of benefit however WACM2 does this in a way that does not positively discriminate for remote islands and so is marginally better than the Original.</i></p>
<p>Do you support the proposed implementation approach? If not, please state why and provide an alternative suggestion where possible.</p>	<p><i>Yes we support the implementation approach proposed by the workgroup.</i></p>
<p>Do you have any other comments?</p>	<p><i>Not at this time.</i></p>