

## 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](mailto: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.

<b>Respondent:</b>	Paul Mott
<b>Company Name:</b>	EDF Energy
<b>Do you believe that the proposed original or any of the alternatives better facilitate the Applicable CUSC Objectives? Please include your reasoning.</b>	<p>EDF Energy believes that either of the original and WACM2 would better facilitate applicable CUSC objective (b), that compliance with the use of system charging methodology results in charges which reflect the costs. This is because in their absence, where a MITS node is created at the end of a circuit which is single circuit in nature, the charge calculation method used in the Transport Model will by default apply the global security factor of 1.8, based on an assumption of redundancy that isn't, in fact, there, and from which relevant connected generators will not benefit as their export is dependent on a single circuit, yet, via the signing of a "transmission related agreement", there is no financial firmness to use of the export route that depends on this single circuit. Either of the original or WACM2 would remove the over-charge.</p> <p>By avoiding the overcharge of 1.8 as described, either of the original or WACM2 would better facilitate (c), as they would take account of developments in transmission licensees' transmission businesses – specifically, the creation of MITS nodes in these circumstances is a new development that hasn't yet come to pass anywhere.</p> <p>WACM2 has the nominal advantage that it is not discriminatory in that it can apply to any relevant circuit, whereas the original solution is limited to island situations. The reference to remote island generation within the statement of defect reads naturally as an example of the defect; it doesn't seem to limit the defect itself to remote island generation situations. However, WACM2 may not be quite as good, as the alternative approach of passing the original and adding future mainland developments in to a mod with a similar effect as and when examples of mainland developments with these characteristics are identified, due to the need to check that generators at the more distant end of such a mainland connection have all signed a transmission related agreement/don't have financially firm connection rights before applying this type of solution. This is because if they did have such rights (which wouldn't, however, normally be the case), they'd receive bid compensation when that non-redundant circuit</p>

	<p>failed - so it would be as if there were redundancy in financial terms, which due to the effect of WACM2 they'd not be paying for.</p> <p>The proposer of WACM1 has suggested that it could promote efficiency in the implementation and administration of the CUSC arrangements better than the original, through a simpler approach. However, to rigidly state that a MITS node cannot come to exist on an island when it otherwise meets the criterion, without consideration as to the configuration of the network assets, seems to be geographically-discriminatory for no clear reason. The legal text to give effect to the original and WACM2 does not seem to be particularly complex or long. We don't, therefore, on reflection, see merit in WACM1.</p>
<b>Do you support the proposed implementation approach? If not, please state why and provide an alternative suggestion where possible.</b>	<p>We note that Ofgem declined the proposer's request for urgency. The modification has nonetheless proceeded at a reasonable pace, if not an accelerated one. The Workgroup proposes implementation for Original, WACM1 or WACM2 (whichever Ofgem may select) to be applicable from 1<sup>st</sup> April 2021, assuming an Ofgem decision by 1<sup>st</sup> October 2020. This seems ample; there won't be any relevant circuits in existence by then.</p>
<b>Do you have any other comments?</b>	No