

CUSC Workgroup Consultation Response Proforma**CMP334: Transmission Demand Residual – consequential definition changes (TCR)**

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 15 April 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation please contact Paul Mullen at paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Simon Lord
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For reference the applicable CUSC objectives are:

Relevant Objective
(a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;
(b) Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and
(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.
*Objective (c) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).

Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the CMP334 Original Proposal better facilitates the Applicable CUSC Objectives?	Yes
2	Do you support the proposed implementation approach for CMP334?	Yes
3	Do you have any other comments?	<p>Yes.</p> <p>CMP 281 and its definitions modification CMP 319 also contain a certification methodology, both this and CMP 319 are similar although have slight differences as the CMP 319 definitions are “common across” CVA and SVA sites. The definitions apply to storage only facilities (not demand for generation) and require import and export metering and a generation licence. For CVA both of these are existing requirements so do not need to be explicitly stated.</p> <p>It would be sensible for the proposer and the code administrator to review the legal text prior to final submission to ensure that if CMP 281 and CMP 319 were approved ahead of this proposal that there would not be any conflicting or incompatible definitions of if there were suggest how these could be resolved e.g. a simple housekeeping modification would resolve any conflict.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
Specific CMP334 Workgroup Consultation questions		
5	Based on the mapping table in Annex 3, does the proposed CMP334	Yes

	solution deliver Ofgem's TCR SCR Direction? Please identify any areas you believe need to be addressed?	
6	Do you agree with the proposed definition of "Single Site"? If not, why not.	Yes
7	Do you agree with the proposed definition of "Final Demand Site"? If not, why not.	See 3
8.	Do you believe the Certification process described in the legal text is fit for purpose? If not, why not?	Yes but see 3