

**CUSC Code Administrator Consultation Response Proforma****CMP343 & CMP340 - Transmission Demand Bandings and allocation (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](mailto:cusc.team@nationalgrideso.com) by **5pm on 22 September 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Panel.

If you have any queries on the content of this consultation, please contact [paul.j.mullen@nationalgrideso.com](mailto:paul.j.mullen@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com).

| Respondent details      | Please enter your details  |
|-------------------------|----------------------------|
| <b>Respondent name:</b> | Paula L Barham             |
| <b>Company name:</b>    | UK Atomic Energy Authority |
| <b>Email address:</b>   | Paula.barham@ukaea.uk      |
| <b>Phone number:</b>    | 01235 466933               |

**CMP343****For reference the applicable CUSC Charging objectives are:**

- 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;*
- 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);*
- 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;*
- 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*
- Promoting efficiency in the implementation and administration of the use of system charging methodology.*

*\*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).*

**CMP340****For reference the applicable CUSC non-charging objectives are:**

- 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 in the right-hand side of the table below, including your rationale.**

| <b>CMP343 - Standard Code Administrator Consultation questions</b> |   |  |
|--|---|--|
| 1  | Do you believe that the CMP343 Original solution, WACM1, WACM2, WACM3, WACM4, WACM5, WACM6, WACM7, WACM8 or WACM9 better facilitates the Applicable CUSC Charging Objectives? | <p>UKAEA is connected to the transmission system and therefore this modification will have a direct impact on our company.</p> <p>We are not overly familiar with the CUSC process and its Charging Objectives. Therefore, our response is based on our understanding of the principles set out by Ofgem in their determination of the Targeted Charging Review.</p> <p>We would expect that a number of solutions to attempt to recover residual transmission costs from would be tabled – given that there is likely to be differing views to collect a fixed residual cost. No one solution can benefit all sites.</p> <p>We would expect that Ofgem approve a fair and proportional recovery of these charges.</p> <p>We note that the 4 band option broadly allocates the same cost to a similar sized site in than band. This seems to be perfectly reasonable and proportionate.</p> <p>Given the other two solutions vary by the number of bands, 1 or 2, the breadth of different sizes of sites connected to the transmission system it seems inappropriate to allocate them to such a limited number of bands.</p> <p>Ofgem has mentioned that a similar concept that was adopted for Extra High Voltage sites connected to the</p> |

|   |   |  |
|---|---|--|
|   |   | distribution network might be appropriate. We agree with this.   |
| 2 | Do you support the proposed implementation approach for CMP343? | Yes, we support an April 2022 implementation.  |
| 3 | Do you have any other comments for CMP343?                      | <p>We only want to reinforce the point made in our answer to question 1.</p> <p>We expect similar sized sites should contribute a similar sized amount to the fixed overhead charge (residual). It seems perverse to take all sites connected to one part of the network, assume they are the same and divide contribution equally between them.</p> |

**CMP340 - Standard Code Administrator Consultation questions**

|   |   |             |
|---|---|-------------|
| 1 | Do you believe that the CMP340 Original solution, WACM1 or WACM2 better facilitates the Applicable CUSC Objectives? | No comment  |
| 2 | Do you support the proposed implementation approach for CMP340?   | No comment  |
| 3 | Do you have any other comments for CMP340?  | No comment. |