Workgroup Consultation Response Proforma

**CMP368 & CMP369**

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 **2 July 2021**. 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 Jennifer Groome Jennifer.Groome@nationalgrideso.com or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com)

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| --- | --- |
| **Respondent details** | **Please enter your details** |
| **Respondent name:** | Click or tap here to enter text. |
| **Company name:** | Click or tap here to enter text. |
| **Email address:** | Click or tap here to enter text. |
| **Phone number:** | Click or tap here to enter text. |

**I wish my response to be:**

|  |  |  |
| --- | --- | --- |
| (Please mark the relevant box) | Non-Confidential | Confidential |

*Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel, the Workgroup or the industry and may therefore not influence the debate to the same extent as a non-confidential response.*

**CMP368**

**For reference the Applicable CUSC (non-charging) Objectives are:**

1. *The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
2. *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;*
3. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*; and*
4. *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).*

**CMP369**

**For reference the Applicable CUSC (charging) Objectives are:**

1. *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;*
2. *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);*
3. *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;*
4. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency; and*
5. *Promoting efficiency in the implementation and administration of the 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).*

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

|  |  |  |
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| **CMP368 Standard Workgroup Consultation questions** | | |
| 1 | Do you believe that the CMP368 Original Proposal better facilitates the Applicable Objectives? | Click or tap here to enter text. |
| 2 | Do you support the proposed implementation approach? | 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? | Click or tap here to enter text. |

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| **CMP369 Standard Workgroup Consultation questions** | | |
| 5 | Do you believe that the CMP369 Original Proposal better facilitates the Applicable Objectives? | Click or tap here to enter text. |
| 6 | Do you support the proposed implementation approach? | Click or tap here to enter text. |
| 7 | Do you have any other comments? | Click or tap here to enter text. |
| 8 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | Click or tap here to enter text. |
| **CMP368 & CMP369 Modification Specific Workgroup Consultation questions** | | |
| 9 | The Proposer is proposing that the both the volumes and charges of Large Distributed Generators are excluded in the compliance calculation, whereas the potential alternative proposes that only the volumes are excluded. Which option do you support and why? | Click or tap here to enter text. |
| 10 | Station demand charges (TNUoS Triad charges on power station demand) would, with the original, be excluded, however the potential alternative would include them. Which option do you support and why? | Click or tap here to enter text. |
| 11 | The Original proposal would not change the current treatment of transmission charges or the associated volumes relating to storage when assessing compliance with the Limiting Regulation. Do you agree with this approach, and if so why? |  |
| 12 | Do you believe that both generation charges and volumes of storage assets should be included in the compliance calculation (page 11)? Does this depend on whether the storage is transmission or distribution connected? Please provide your rationale. |  |
| 13 | What do you think is the appropriate time stamp for defining whether a network asset is “pre-existing” (page 11)? E.g. when a generator wished to connect, was the network asset:   * 1. Already planned to be built   2. Already committed to be built   3. Already under construction   4. Finished construction   5. Commissioned and fully operational |  |
| 14 | Do you consider there to be any specific changes to a BCA that may trigger the reclassification of assets? If so, please provide your rationale. |  |
| 15 | Do you think an obligation should be placed on the ESO to publish the outturn value and transparently show the working for calculating the average transmission charge paid by generators (page 15)? Please explain your rationale. |  |
| 16 | How should charges be treated relating to upgrades to local assets? Please explain your rationale.   * 1. Only exclude charges for new upgrades that are paid by a new generator.   2. Exclude charges paid for the new upgrades that are paid by both existing and new generators.   3. Do not exclude any cost related to new upgrades because the upgrade to pre-existing assets was not required to connect the new generator.   4. Other |  |
| 17 | Four different options are given on page 22 of the Workgroup Consultation, two of which demonstrate different interpretations of “interconnectedness”. that the CMA identified. Figures 8-11 provide simple examples to help define what network assets should have their charges captured within the Connection Exclusion. Which of the two options (1 or 2) for “sufficient interconnectedness” do you agree with, and why? |  |
| 18 | Option 3 (page 22) notes that the CMA says there may be other relevant factors - do you think any other factors should be taken into account, and if so, what? |  |
| 19 | The Proposer is considering a potential alternative to utilise data that already exists within the onshore TOs’ Price Control Finance Models (PCFM) (page 25-26), attached in Annex 5. This based on the assumption that a portion of total onshore local charges is associated with non pre-existing assets, and that this portion can be derived by comparing the Generation Connections Volume Driver with the total revenue across all three onshore TOs. Do you support this option? Why? |  |
| 20 | Do you agree with the proposed definitions of non pre-existing assets ‘NPEA’ and pre-exiting assets ‘PEA’? |  |
| 21 | Do you agree that the legal definitions in the Original Proposal should be limited to TNUoS charges only or include all transmission charges? |  |
| 22 | Do you agree that the legal text delivers the intent of the Original Proposal? |  |