

Workgroup Consultation Response – Pro-Forma

CMP308: Removal of BSUoS charges from Generation

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 **8 May 2019** 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>Joe Dunn</i>
Company Name:	<i>ScottishPower Renewables</i>
Do you believe that the proposed original or any of the alternatives better facilitate the Applicable CUSC Objectives? Please include your reasoning.	<p>For reference, the Applicable CUSC objectives are:</p> <ul style="list-style-type: none">(a) the efficient discharge by the licensee of the obligations imposed upon it under the Act and by this 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.(d) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.
Do you support the proposed implementation approach? If not, please state why and provide an alternative suggestion where possible.	Yes
Do you have any other comments?	No

Do you feel it is more efficient for BSUoS to be handled by customers / suppliers rather than customers / suppliers and generators?	<i>We believe there will be an efficiency gain by reducing the administration and transaction costs currently handled.</i>
If CMP308 were to be implemented, what would your thoughts be in regards to combined/net risk premia?	-
What do you feel would be a sufficient lead time for the implementation of this modification? Would you support a non-April (i.e. October) implementation date in any given year? Please provide an explanation for your response	<i>We believe a minimum of two years will be sufficient lead time to implement this modification. We would support an April implementation date, over a non-April date, as it will align with other industry charging regimes that run over the financial year.</i>
Has the Analysis comprehensively considered consumer/system benefits, or can you identify any area which may need more consideration by the workgroup?	<i>No comment</i>
Are there any thoughts on the impact of CMP308 on the generation mix, be that short or long term? Will there be any significant IT costs to change your systems as a result of CMP308? If so please give detail.	<i>We do not foresee any significant IT costs to change systems</i>
Are there any unintended consequences of CMP308 which have not as yet been considered by the workgroup?	<i>Interaction with other BSUoS related modification proposals, CMP 281 and 307</i>
Will there be any specific	<i>We believe there will be a positive impact to help generation</i>

<p>impact on renewable or distributed generation, be that long or short term?</p>	<p><i>compete in future European Balancing markets, where the majority of European generators are not liable for BSUoS charges.</i></p>
<p>Will there be any significant IT costs to change your systems as a result of CMP308? If so please give detail.</p>	<p><i>We do not foresee any significant IT costs to changes systems.</i></p>