

Code Administrator Consultation Response Proforma**CMP415: Amending the Fixed Price Period from 6 to 12 months**

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 **13 September 2023**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact cusc.team@nationalgrideso.com

| Respondent details | Please enter your details | |
|--|---|---|
| Respondent name: | Damian Clough | |
| Company name: | SSE Generation | |
| Email address: | Damian.Clough@sse.com | |
| Phone number: | 07833087067 | |
| Which best describes your organisation? | <input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector | <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other |

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 or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

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

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- 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;*
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- Promoting efficiency in the implementation and administration of the CUSC arrangements.*

**The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity*

(recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.

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

| Standard Code Administrator Consultation questions | | | | | | |
|--|---|--|----------|---|-------|---|
| 1 | Please provide your assessment for the proposed solution(s) against the Applicable Objectives? | <p>Mark the Objectives which you believe the proposed solution(s) better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D</td> </tr> <tr> <td>WACM1</td> <td><input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D</td> </tr> </table> <p>Neither. These two options were raised to counter the original solution raised for CMP408 and to give Ofgem a more complete set of options from a governance point of view. Overall, the current baseline is better and has not yet been given sufficient time to be bedded in.</p> <p>.</p> | Original | <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D | WACM1 | <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D |
| Original | <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D | | | | | |
| WACM1 | <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D | | | | | |
| 2 | Do you have a preferred proposed solution? | <p> <input type="checkbox"/>Original <input type="checkbox"/>WACM1 <input checked="" type="checkbox"/>Baseline <input type="checkbox"/>No preference </p> <p>Click or tap here to enter text.</p> | | | | |
| 3 | Do you support the proposed implementation approach? | <p> <input type="checkbox"/>Yes <input checked="" type="checkbox"/>No </p> <p>Click or tap here to enter text.</p> | | | | |
| 4 | Do you have any other comments? | Again, these modifications as like CMP408 have been raised more for the benefit and ease of the ESO as opposed to Industry and the end consumer. | | | | |