

**Workgroup Consultation Response Proforma****CMP425: Billing Demand Transmission Residual By Site**

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 **15 November 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 Milly Lewis [Milly.Lewis@nationalgrideso.com](mailto:Milly.Lewis@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Martin Cahill	
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<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input checked="" 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 (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;*

- d. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*; and*
- e. *Promoting efficiency in the implementation and administration of the system charging methodology.*

*\*The Electricity Regulation referred to in objective (d) 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 Workgroup Consultation questions				
1	Do you believe that the Original Proposal better facilitate the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input checked="" type="checkbox"/>E</td> </tr> </table> <p>A- There is a positive Impact on competition by increasing the flexibility in choosing a supplier where there are multiple customers at one connection site.</p> <p>B – Ensures that there is a practical method of collecting the TDR on a site basis when there are multiple suppliers at one connection site.</p> <p>C – Neutral</p> <p>D – Neutral</p> <p>E – While a system change is required, this modification will provide clarity in how to apply the TDR charge in certain scenarios, and therefore it will improve efficiency in the implementation of the charging methodology. By introducing a system change it will reduce risk of any situations where manual workarounds are required</p>	Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/> E
Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/> E			
2	Do you support the proposed implementation approach, notably the date?	<table border="1"> <tr> <td> <input checked="" type="checkbox"/>Yes  <input type="checkbox"/>No </td> <td> <input type="checkbox"/>Implement ASAP  <input checked="" type="checkbox"/>Implement 2025  <input type="checkbox"/>No preference </td> </tr> </table> <p>ESO Support an implementation of 2025. This will ensure that systems can be set up to automate the process and reduce the risk of any errors. We have not yet seen evidence of any customers who wish to benefit from an earlier implementation.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Implement ASAP <input checked="" type="checkbox"/> Implement 2025 <input type="checkbox"/> No preference
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Implement ASAP <input checked="" type="checkbox"/> Implement 2025 <input type="checkbox"/> No preference			
3	Do you have any other comments, including any learnings from similar issues?	Click or tap here to enter text.		
4	Do you wish to raise a Workgroup	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

	Consultation Alternative Request for the Workgroup to consider?	Click or tap here to enter text.
5	Do you consider your organisation to be impacted by this modification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Yes as a system change will be required as part of the change