Workgroup Consultation Response Proforma

**CMP453: BSUoS on a net basis at BSC Trading Units**

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@n](mailto:cusc.team@n)eso.energy by **5pm** on **04 August 2025**. 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 [prisca.evans@neso.energy](mailto:Prisca.Evans@neso.energy) or to [cusc.team@neso.energy](mailto:cusc.team@neso.energy).

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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. | |
| **Which best describes your organisation?** | Consumer body  Demand  Distribution Network Operator  Generator  Industry body  Interconnector | Storage  Supplier  System Operator  Transmission Owner  Virtual Lead Party  Other |

**I wish my response to be:**

|  |  |
| --- | --- |
| (Please mark the relevant box) | Non-Confidential *(this will be shared with industry and the Panel for further consideration)* |
|  | **Confidential** (this *will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration)* |

**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 C11 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 and the ISOP business\*;*
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.*

*\* See Electricity System Operator Licence*

*\*\*The Electricity Regulation referred to in objective (g) 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.*

**For reference, the Electricity Balancing Regulation (EBR) Article 3 Objectives and regulatory aspects are:**

1. *fostering effective competition, non-discrimination and transparency in balancing markets;*
2. *enhancing efficiency of balancing as well as efficiency of national balancing markets;*
3. *integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
4. *contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;*
5. *ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;*
6. *facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;*
7. *facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.*

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| **What is the EBR?** |
| The Electricity Balancing Regulation (EBR) is a European Network Code introduced by the Third Energy Package European legislation in late 2017.  The EBR regulation lays down the rules for the integration of balancing markets in Europe, with the objectives of enhancing Europe’s security of supply. The EBR aims to do this through harmonisation of electricity balancing rules and facilitating the exchange of balancing resources between European Transmission System Operators (TSOs). Article 18 of the EBR states that TSOs such as the NESO should have terms and conditions developed for balancing services, which are submitted and approved by Ofgem. |

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

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| **Standard Workgroup Consultation questions** | | | |
| 1 | Do you believe that the Original Proposal better facilitates the Applicable Objectives versus the current baseline? | Mark the Objectives which you believe the proposed solution better facilitates than the current baseline: | |
| Original | d e f g h None |
| Click or tap here to enter text. | |
| 2 | Do you support the proposed implementation approach? | Yes  No | |
| 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? | Yes (the request form can be found in the [Workgroup Consultation](https://www.neso.energy/industry-information/codes/cusc/modifications/cmp453-bill-bsuos-net-basis-bsc-trading-units) Section)  No | |
| Click or tap here to enter text. | |
| 5 | Does the draft legal text satisfy the intent of the modification? | Yes  No | |
| Click or tap here to enter text. | |
| 6 | Do you agree with the Workgroup’s assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code? | Yes  No | |
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| **Specific Workgroup Consultation questions** | | |
| 7 | Do you agree that this modification has no impact on competition in generation? | Yes  No |
| Click or tap here to enter text. |
| 8 | Do you believe there is a risk that implementing this modification will create an incentive that others could use to reduce BSUoS (and therefore impose more BSUoS on a smaller group of payees) ? | Yes  No |
| Click or tap here to enter text. |
| 9 | How to better define who is eligible for this functionality. Do you prefer:  a) Any trading unit defined as a class 1-3 or a class 6 trading unit.  Or  b) Any trading unit that shares the same connection point? | A  B |
| Click or tap here to enter text. |
| 10 | Do you agree that the modification results in more cost reflective charging of BSUoS for customers who do not use the Total System by virtue of their connection agreement? | Yes  No |
| Click or tap here to enter text. |