

Public

## Code Administrator Consultation Response Proforma

### CMP316: TNUoS Arrangements for Co-located Generation Sites

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 [usc.team@neso.energy](mailto:usc.team@neso.energy) by **5pm** on **28 July 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 or [usc.team@neso.energy](mailto:usc.team@neso.energy)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Hector Perez	
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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 Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input checked="" 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** (*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 Panel or the industry for further consideration*)

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

- d) 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;*
- e) 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);*
- f) 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\*;*
- g) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*\*; and*
- h) 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.*

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**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 solutions against the Applicable Objectives against the current baseline?	Mark the Objectives which you believe the proposed solutions better facilitates than the current baseline:				
		<table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>d <input checked="" type="checkbox"/>e <input type="checkbox"/>f <input type="checkbox"/>g <input type="checkbox"/>h <input type="checkbox"/>None</td> </tr> <tr> <td>WACM1</td> <td><input checked="" type="checkbox"/>d <input checked="" type="checkbox"/>e <input type="checkbox"/>f <input type="checkbox"/>g <input type="checkbox"/>h <input type="checkbox"/>None</td> </tr> </table>	Original	<input checked="" type="checkbox"/> d <input checked="" type="checkbox"/> e <input type="checkbox"/> f <input type="checkbox"/> g <input type="checkbox"/> h <input type="checkbox"/> None	WACM1	<input checked="" type="checkbox"/> d <input checked="" type="checkbox"/> e <input type="checkbox"/> f <input type="checkbox"/> g <input type="checkbox"/> h <input type="checkbox"/> None
		Original	<input checked="" type="checkbox"/> d <input checked="" type="checkbox"/> e <input type="checkbox"/> f <input type="checkbox"/> g <input type="checkbox"/> h <input type="checkbox"/> None			
		WACM1	<input checked="" type="checkbox"/> d <input checked="" type="checkbox"/> e <input type="checkbox"/> f <input type="checkbox"/> g <input type="checkbox"/> h <input type="checkbox"/> None			
<p>The original and WACM1 both better facilitate against the status quo.</p> <p><b>Objective d – Positive:</b></p> <ul style="list-style-type: none"> <li>• The current TNUoS methodology bases charges for co-located sites on the predominant technology, which is not cost-reflective for co-located sites; adopting the original or WACM1 methodology would better support competition by accounting for each co-located asset's technology and typical network usage.</li> </ul> <p><b>Objective e – Positive:</b></p> <ul style="list-style-type: none"> <li>• The solutions offer a more cost reflective TNUoS methodology for co-located sites, by accounting for the individual characteristics of the BM Units that comprise the co-located site, rather than solely the predominant technology type.</li> </ul> <p><b>Objective f, g and h:</b></p> <ul style="list-style-type: none"> <li>• Neutral</li> </ul>						

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2	Do you believe that the amendments have met the deficiencies of the Send Back letter?	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No
		<p>Yes, grammatical, mathematical and formatting errors have also been resolved to ensure the calculations are clear within the legal text.</p> <p>The use of shorter acronyms has also been considered to allow for better readability and clarity in the calculation of TNUoS charges.</p>
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No
		<p>Given the expected increase in the number of co-located sites in the future, this approach would ensure individual sites' characteristics are recognised and charged consistently, ensuring the use of system charges becomes more cost reflective.</p>
4	Do you have any other comments?	<p>SPR recognises that the proposed change may be seen as adding additional complexity compared to the current approach. However, this may be justified by the benefit of delivering a more cost-reflective charge.</p>