

Public

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@neso.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 or to cusc.team@neso.energy.

Respondent details	Please enter your details	
Respondent name:	Matthew Foster	
Company name:	Triton Power	
Email address:	matthew.foster@tritonpower.co.uk	
Phone number:	07549 026586	
Which best describes your organisation?	<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 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:

Public

(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:

- 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.

Public

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

- a) fostering effective competition, non-discrimination and transparency in balancing markets;*
- b) enhancing efficiency of balancing as well as efficiency of national balancing markets;*
- c) integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
- d) 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;*
- e) 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;*
- f) 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;*
- g) 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.*

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

Public

(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.

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:
		<table border="1"> <tr> <td>Original</td> <td> <input checked="" type="checkbox"/>d <input checked="" type="checkbox"/>e <input checked="" type="checkbox"/>f <input type="checkbox"/>g <input checked="" type="checkbox"/>h <input type="checkbox"/>None </td> </tr> </table> <p>d) This modification would improve competition by correctly charging balancing costs to the parties responsible.</p> <p>e) The system charging methodology works on the basis that charges should be cost reflective. This modification would improve cost reflectivity.</p> <p>f) It will not benefit the total system if these customers choose to rewire their sites, making no difference to their system impact, but adding costs to British business.</p> <p>h) The improved cost reflectivity improves efficiency.</p>
Original	<input checked="" type="checkbox"/> d <input checked="" type="checkbox"/> e <input checked="" type="checkbox"/> f <input type="checkbox"/> g <input checked="" type="checkbox"/> h <input type="checkbox"/> None	
2	Do you support the proposed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Public

Specific Workgroup Consultation questions		
7	Do you agree that this modification has no impact on competition in generation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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) ?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No These customers are paying for charges that they are not creating as they do not use the whole system. It is not the benefit of anyone that charges become levied on the incorrect parties in the nae of just spreading the costs. If this is not implemented, sites will instead have to consider rewiring their sites. This will have no impact on the system as a whole, but it will increase costs to business, which are ultimately damages UK pc.
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	<input checked="" type="checkbox"/> A <input type="checkbox"/> B A seems clearer in defining the units where the point of connection is shared.

Public

	b) Any trading unit that shares the same connection point?	
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>These customers should not be paying BSUoS for energy that they are effectively taking on-site. They are not using the Total System and therefore at that time should not be paying for it.</p>