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Workgroup Consultation Response Proforma

CMP460: Improving Transmission Connection Asset Charging

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 **18 February 2026**. 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@neso.energy

Respondent details	Please enter your details	
Respondent name:	Philip Bale	
Company name:	Roadnight Taylor	
Email address:	clients@roadnighttaylor.co.uk	
Phone number:	01993 830571	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input 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 checked="" 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*)

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☐ **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)

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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For reference, (for consultation question 5) 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.

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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.

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 Original Solution better facilitates than the current baseline:	
		Original	<input checked="" type="checkbox"/> d <input type="checkbox"/> e <input type="checkbox"/> f <input type="checkbox"/> g <input checked="" type="checkbox"/> h <input type="checkbox"/> None
		<p>Yes, the proposal broadly improves the Code Objectives versus the current baseline or has a neutral impact on them.</p> <p>The current baseline introduces a “postcode” lottery approach which hinders both generation and demand projects. Whilst the proposal has focused on embedded generation, the approach will also support embedded demand connections which can also be subject to SGT costs. The Original Proposal is believed to be an improvement on the baseline for both generation and demand customers. It also resolves some differences between Distribution and Transmission connections which exists.</p>	

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2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Yes, Roadnight Taylor supports the implementation approach because we believe it supports the contractual position of customers who are in the process of connecting, however we note that a very small number of customers may be incentivised to pause or delay their connection until after the implementation dates.</p>
3	Do you have any other comments?	<p>There is a risk that without strategically planned system and upgrades mapped out, the approach of not doing this could introduce inefficiencies in the design and development of the system, especially if funded via Transmission Demand Residual. Whilst CP2030 will help to coordinate the amount of generation projects in a specific region, it may not entirely result in the same optimised assets if a network was strategically planned.</p> <p>It is recommended that the Needs Case / CBA is done by the TO much earlier in the design process to ensure that the solution is economic and efficient, this could result in RDP (Regional Development Programmes) being implemented as an alternative to new SGTs. This should be done as part of strategic regional planning.</p> <p>Under the current baseline, there are existing Generation customers who are being forced to fund SGT upgrades at a GSP, even when it is their strong preference to have an enduring ANM solution as the most economic and efficient solution for them.</p>
4		<input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section)

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	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> No Roadnight Taylor is exploring raising an Alternative which would follow the original proposal, but to ensure there is an aspect of economic safeguards in place. This may include some form of earlier Needs Case / CBA undertaken by the TO. An alternative request may be informed by other consultation responses.
5	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?	<input type="checkbox"/> Yes <input type="checkbox"/> No Roadnight Taylor has not disagreed with the views of the working group.

Specific Workgroup Consultation questions

6	Do you agree with the Proposer's view on when the new definition of	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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	Infrastructure Assets and Connection Assets should be applied to new and existing connection agreements, and therefore amend the connection charges in a User's agreement?	Yes, Roadnight Taylor agrees that any changes should be retrospective for assets which could be shared.
7	Is moving the cost to Transmission Demand Residual (TDR) reasonable?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Yes, Roadnight Taylor believes that moving the costs to TDR is probably the most appropriate way, however it is a concern that if the works which are subsequently triggered are not strategically planned, that this may result in costs which are passed on through the TDR for a system which is not necessarily economic and efficient from a whole system perspective. Therefore, we believe that an earlier Needs Case / CBA undertaken by the TO would ensure that appropriate solutions are developed for the benefit of both generation and demand customers. This would make the move to TDR reasonable as it could be seen as investment ahead of need.</p>