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## Workgroup Consultation Response Proforma

### CMP445: Pro-rating first year TNUoS for Generators

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 [cust.team@neso.energy](mailto:cust.team@neso.energy) by **5pm** on **22 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 [cust.team@neso.energy](mailto:cust.team@neso.energy).

Respondent details	Please enter your details	
<b>Respondent name:</b>	Kirsty Dawson	
<b>Company name:</b>	Statkraft UK Ltd	
<b>Email address:</b>	Kirsty.Dawson@statkraft.com	
<b>Phone number:</b>	07442 604102	
<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 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

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**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:**

- 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\*;*

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- 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.*

*Means the Use of System Charging Objectives, as if references therein to the Use of System Charging Methodology were to the Connection Charging Methodology and in addition, the objective (where consistent with the other objectives) of facilitating competition in the carrying out of works for connection to the National Electricity Transmission System.*

### 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.

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**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 and/or any potential alternatives better facilitate the Applicable Objectives versus the current baseline?	Mark the Objectives which you believe each solution better facilitates than the current baseline:	
		Original	<input checked="" type="checkbox"/> (d) <input checked="" type="checkbox"/> (e) <input checked="" type="checkbox"/> (f) <input checked="" type="checkbox"/> (g) <input checked="" type="checkbox"/> (h) <input type="checkbox"/> None
		WACM1	<input checked="" type="checkbox"/> (d) <input checked="" type="checkbox"/> (e) <input checked="" type="checkbox"/> (f) <input checked="" type="checkbox"/> (g) <input checked="" type="checkbox"/> (h) <input type="checkbox"/> None
		Click or tap here to enter text.	
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes (the request form can be found in the <u>Workgroup Consultation</u> Section) <input checked="" type="checkbox"/> No	
		Click or tap here to enter text.	
5	Does the draft legal text satisfy the	<input type="checkbox"/> Yes <input type="checkbox"/> No	

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	intent of the modification?	We have ticked neither as it is not clear from Annex 04 what text has been changed. To be clear, our support is currently with WACM1 and note that the legal text for this is yet to be drafted.
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Click or tap here to enter text.

## Specific Workgroup Consultation questions

7	In negative charging zones, Generators receive credits based on output from November to February, unlike the TEC-based approach used in positive charging zones. The Workgroup propose that the prorating should be applied equally to all zones without distinction	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  We agree with the Workgroup's proposal that the prorating should be applied equally to all zones without distinction between positive and negatively charged zones. We believe this promotes fairness across industry and reduces administration and time burdens by simplifying and standardising the approach.
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	between positive or negatively charged zones. Do you agree? Please explain your rationale.	
8	Do you have any views on the specific calculation proposed for prorating charges? Please provide your views.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		We agree with the calculation proposed due to its simplicity – we would like to clarify that there seems to be a typo in the workgroup consultation which states “1/356 on a leap year” which should be “1/366 on a leap year”.
9	Do you agree that a similar solution should be applied to operational users who permanently reduce their TEC, such as when decommissioning capacity or closing a generating station (or phase of a generating station)? please explain your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		We agree that a similar solution should be applied to operational users who permanently reduce their TEC. We believe this promotes ‘good’ behaviours in terms of releasing any TEC back to the network. We do also agree with the concern that Users may temporarily reduce their TEC to avoid charges, and support the Workgroup in continuing to develop this within the WACMI solution.