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Code Administrator 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 cusc.team@neso.energy by **5pm** on **29 April 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: | Rowan Howe | |
| Company name: | Fidra Energy | |
| Email address: | Rowan.howe@fidraenergy.com | |
| Phone number: | +44 131 287 1666 | |
| 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 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:

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| | |
|--------------------------------|---|
| (Please mark the relevant box) | <input checked="" type="checkbox"/> Non-Confidential (this <i>will be shared</i> with industry and the Panel for further consideration) |
| | <input type="checkbox"/> Confidential (this <i>will be disclosed</i> to the Authority in full but, unless specified, <i>will not be shared</i> 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

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2020/1006.

For reference, (for consultation questions 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?

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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.

| Standard Code Administrator Consultation questions | | |
|--|---|---|
| 1 | Please provide your assessment for the proposed solution(s) against the Applicable Objectives against the current baseline. | Mark the Objectives which you believe the proposed solution(s) better facilitates than the current baseline: |
| | | 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 |
| | | WACM1 <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 |
| | | WACM2 <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 |
| | | Fidra Energy considers all three proposed solutions to better facilitate objectives d, e, f and h relative to the current baseline. In each case, the proposals better align TNUoS charges with actual access to the Transmission System, improving cost reflectivity |

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| | | and reducing distortions to competition and connection timing. |
| 2 | Do you have a preferred proposed solution? | <input type="checkbox"/> Original <input type="checkbox"/> WACM1 <input checked="" type="checkbox"/> WACM2 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference |
| | | <p>Fidra Energy’s preferred solution is WACM2. We consider it to be the most complete and cost-reflective option, as it applies the same core principle as WACM1 and the Original proposal, while also addressing the retrospective period from 1 April 2024.</p> <p>If retrospective application is not accepted, WACM1 would in our view remain preferable to the Original proposal.</p> |
| 3 | Do you support the proposed implementation approach? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| | | <p>Yes. We support the proposed implementation approach. Implementing the change from the start of a charging year appears sensible and should provide clarity for administration, billing and reconciliation.</p> |
| 4 | Do you have any other comments? | It will be important that the final drafting remains clearly limited to genuine permanent connection or |

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| | | <p>TEC changes and is not used to facilitate short-term profiling or seasonal optimisation.</p> <p>If WACM2 is not accepted in full, we would support WACM1 as the preferable fallback rather than reverting to the narrower Original proposal or the current baseline.</p> |
| 5 | <p>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?</p> | <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Yes. We agree with the Workgroup’s assessment that CMP445 does not impact the EBR Article 18 terms and conditions held within the Code. CMP445 concerns transmission charging arrangements, whereas EBR Article 18 relates to the terms and conditions for balancing services.</p> |