**CUSC Code Administrator Consultation Response Proforma**

**CMP293 - National Grid Legal Separation changes to CUSC Exhibits & Schedules (non-charging)**

**&**

**CMP294 - National Grid Legal Separation changes to CUSC Section 14**

Industry parties are invited to respond to this Code Administrator Consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **5:00pm** on **24 August 2018** to [cusc.team@nationalgrid.com](mailto:cusc.team@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not be included within the Final Workgroup Report to the Authority.

Any queries on the content of the consultation should be addressed to Shazia Akhtar at Shazia.Akhtar2[@nationalgrid.com](mailto:heena.chauhan@nationalgrid.com)

These responses will be included within the Draft CUSC Modification Report to the CUSC Panel and within the Final CUSC Modification Report to the Authority.

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| **Respondent:** | *Please insert your name and contact details (phone number or email address)* |
| **Company Name:** | *Please insert Company Name* |
| **Please express your views regarding the Code Administrator Consultation, including rationale.**  **(Please include any issues, suggestions or queries)** | *For reference, the Applicable CUSC (non-Charging) objectives are:*  (a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;  (b) Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;  (c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*; and  (d) Promoting efficiency in the implementation and administration of the CUSC arrangements |

\*Objective (c) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).

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|  | *For reference, the Applicable CUSC (Charging) objectives are:*  (a) a) 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;  (b) 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 C26 requirements of a connect and manage connection);  (c) 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;  (d) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency. These are defined within the National Grid Electricity Transmission plc Licence under Standard Condition C10, paragraph 1 \*; and  (e) Promoting efficiency in the implementation and administration of the CUSC arrangements. |

\*Objective (d) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER).

**Code Administrator Consultation questions**

| **Q** | **Question** | **Response** |
| --- | --- | --- |
| 1 | **Do you believe CMP293&294 better facilitates the Applicable CUSC Objectives? Please include your reasoning** |  |
| 2 | **Do you support the proposed implementation and transition approach detailed within section 7 of this report which has been drafted in CUSC Section 10 and the associated Novation Agreement? Are there any further transitional implications that need to be identified in CUSC 10.6.1 or contracts under CUSC 10.4.3?** |  |
| 3 | **Do you support the revised approach of how the ‘Nuclear Site Licence Provisions Agreement’ will be managed in the CUSC, with reference to the Transmission Owners?** |  |
| 4 | **Is the reference to NGET appropriate in the two CUSC extracts, for the regulatory asset value in the defined term of ‘The Company Prescribed Level’ in CUSC section 10 and the Weighted Average Cost of Capital calculation in CUSC 14.15.65?** |  |
| 5 | **Within the CUSC, contact details for The Company are provided by references to e-mail boxes, addresses and telephone numbers. Would you prefer these to more generically to refer to details on the website or keep these specific references? If specific references are required these will need to be updated following the consultation.** |  |
| 6 | **Do you have any other comments?** |  |