

## CUSC Workgroup Consultation Response Proforma

### CMP320 – Island MITS Radial Link Security Factor

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 by **5pm** on **27 September 2019** to [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Paul Mullen at [paul.j.mullen@nationalgrideso.com](mailto:paul.j.mullen@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com).

<b>Respondent:</b>	<i>Dennis Gowland</i>
<b>Company Name:</b>	<i>Neven Point Wind Ltd (Orkney)</i>
<b>Please express your views regarding the Workgroup Consultation, including rationale.</b>  <b>(Please include any issues, suggestions or queries)</b>	<i>We believe that the original proposal (CMP320) is designed specifically to deal with a defect in the current charging methodology concerning single radial links to Islands and Island groups. We support the proposal in that a single cable link between a mainland MITS and an Islands MITS (which may be more than one within an Island group) should be subject to a security factor of 1 rather than the 1.8 envisaged in the current methodology. It is our view that for scenarios where there may be more than 0% redundancy but less than 100% that this should be the subject of a separate CMP.</i>

### Standard Workgroup Consultation questions

<b>Q</b>	<b>Question</b>	<b>Response</b>
1	<p><i>Do you believe that CMP320 Original Proposal better facilitates the Applicable CUSC Objectives?</i></p> <p>a) <i>Yes – in that correction would allow Island generation to come on stream and offer more competition in the generation market</i></p> <p>b) <i>Yes single links offering no redundancy charged at a security factor of 1.0</i></p>	<p><i>For reference the applicable CUSC objectives are:</i></p> <p>a) <i>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;</i></p> <p>b) <i>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</i></p>

	<p><i>would be fully cost reflective.</i></p> <p>c) Yes d) Yes e) Yes</p>	<p><i>in their transmission businesses and which are compatible with standard licence condition C26 requirements of a connect and manage connection);</i></p> <p>c) <i>That, so far as is consistent with subparagraphs (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;</i></p> <p>d) <i>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</i></p> <p>e) <i>Promoting efficiency in the implementation and administration of the CUSC arrangements.</i></p> <p><i>*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).</i></p>
2	Do you believe that the Workgroup has met its Terms of Reference?	Yes
3	Do you support the proposed implementation approach?	Yes
4	Do you have any other comments?	We believe that it is important for the proposal to take into account that there may be more than 1 MITS node on an Island particularly where the Island is an Island group. Here constituent Islands may well be linked to a MITs node which in turn links to another MITs node such that each is linked by single links. and the ultimate MITS linking to the Mainland UK grid is also a single link. This is described in Scenario B of the powerpoint example.
5	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No

### Specific CMP320 questions

Q	Question	Response
6	Do you believe that the Legal Text (set out in Annex 3 of the Workgroup Report) achieves the intent of this Modification?	Considering the 'Island Specific Approach' – in our view the wording achieves the intent with the proviso that 14.15.90A should read ...a MITS Node [insert <i>or Nodes</i> ] located on a Remote Island and a MITS node not located on a Remote Island.....
7	Would it be better, in terms of the Applicable Objectives, for the solution to apply only to subsea circuits, or also include onshore circuits as well. Please explain your answer?	We believe that in order to avoid complication that the solution should apply to Island circuits - bearing in mind that these may include onshore and subsea elements - but where the links are single and offer no redundancy.