

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. 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 or cusc.team@nationalgrideso.com.

Respondent:	Lizzie Foot lizzie@hoolanenergy.com
Company Name:	Costa Head Wind Farm Limited
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	Costa Head Wind Farm Limited supports the CMP320 proposal and Scenario B as set out in Annex 2 (Network Circuit Topographies) of the CMP320 Workgroup Report.

Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that CMP320 Original Proposal better facilitates the Applicable CUSC Objectives?	<p>For reference the applicable CUSC objectives are:</p> <p>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;</p> <p>- YES</p> <p>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</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>- YES</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>- YES</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>- YES</p> <p>e) <i>Promoting efficiency in the implementation and administration of the CUSC arrangements.</i></p> <p>- YES</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?	<p>Costa Head Wind Farm Limited supports the CMP320 proposal.</p> <p>The current baseline charging methodology security factor for circuits classed as 'wider' in the transmission network is 1.8. This is multiplied by the zonal location tariff for generators to reflect redundancy in the transmission system.</p>

		<p>However, as many island connection transmission designs are radial spurs and therefore are connected by a single radial circuit to the mainland, there is effectively no redundancy in the transmission circuit.</p> <p>The definition of MITS means that it is possible that, in certain circumstances beyond the control of the User, a MITS node may be created on an island or islands which are served by a single radial subsea circuit to the mainland.</p> <p>The application of the Security Factor where a MITS node is located on an island or islands which, in turn, is connected to the mainland on a single radial subsea circuit needs to be changed from 1.8 to 1.0 if the relevant circumstances apply, to avoid generators on those islands paying charges that are 80% more expensive than is cost reflective.</p> <p>Costa Head Wind Farm Limited also supports ‘Scenario B’ (more than one island MITS linked by a single exporting circuit) as set out in Annex 2 of the CMP320 Workgroup Report.</p>
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?	- YES
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?	The solution should apply to islands, which may include subsea and onshore circuits.