

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:	Paul Jones paul.jones@uniper.energy
Company Name:	Uniper UK Ltd
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	

Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that CMP320 Original Proposal better facilitates the Applicable CUSC Objectives?	Yes. It should improve cost reflectivity in charging the relevant circuits and better promote competition, better meeting objectives a and b. It should be largely neutral against the other objectives.
2	Do you believe that the Workgroup has met its Terms of Reference?	Largely although we believe more work needs to be done to ensure the calculation of the locational onshore security factor is consistent.
3	Do you support the proposed implementation approach?	Yes
4	Do you have any other comments?	Yes, we have comments on the legal text in response to question 6.
5	Do you wish to raise a	No thank you.

	Workgroup Consultation Alternative Request for the Workgroup to consider?	
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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?	It largely does, but it does not seem to meet the intent of ensuring that Identified Onshore Circuits do not get used in the calculation of the locational onshore security factor (ie the current 1.8 factor) which is used for other wider circuits. The calculation outlined in 14.15.88 of the CUSC should explicitly state this. However, it is not fully clear how to treat the situation where assets which should have the locational onshore security factor applied to them are separated from the rest of the network with Identified Onshore Circuits, such as in Scenario C. If the identified Onshore Circuits are not included in the load flow model then neither will the isolated wider circuits. Thought should be given to how this could be accommodated.
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 original introduces a degree of undue discrimination as it proposes different treatment for remote island MITs only. Whether a MITs is on a specific geographical feature should not be specific reason for different charging arrangements under the charging methodology as it is not relevant for that purpose. The network topographies are what's relevant regardless of whether these exist on the mainland or on islands. Therefore the solution should apply to onshore circuits too.