

CUSC Workgroup Consultation Response Proforma

CMP345: 'Defer the additional Covid BSUoS costs'

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@nationalgrideso.com by **5pm on 3 June 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation please contact Paul Mullen at paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Joe Dutton, Supplier Liaison Manager
Company name:	LG Energy Group Limited
Email address:	Joe.dutton@lge-group.com
Phone number:	07392085940

CMP345

For reference the applicable CUSC Charging objectives are:

Relevant Objective
(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) To promote efficiency in the implementation and administration of the CUSC arrangements

Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.

CMP345 - Standard Workgroup Consultation questions		
1	Do you believe that the CMP345 Original Proposal better facilitates the Applicable CUSC Charging Objectives?	LGE and Leep believe that the objectives stated by CUSC are better fulfilled by CMP345 in that it will help mitigate the cost impact on stakeholders during a period when many participants will be vulnerable to large unforeseen costs.
2	Do you support the proposed implementation approach for CMP345?	LGE and Leep agree with the implementation approach and believe that the timescales accurately reflect the urgent requirement for the Code Modification.
3	Do you have any other comments?	Click or tap here to enter text.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Click or tap here to enter text.
Specific Workgroup Consultation Questions		
5	Do you believe it is necessary to define Covid related costs for the purposes of BSUoS charging as a result of this Modification proposal? Please provide rationale to support your response.	Both LGE and Leep believe that it is not necessary to define Covid-19 related costs for the purposes of the Modification proposal. Due to the significant shift that has resulted from Covid-19 all consumers have been affected to some extent and it would not be reasonable to isolate certain costs as being Covid-19.
6	Do you agree with the Original Proposal (and each of the potential alternatives) as to what constitutes Covid related costs? Please provide rationale to support your response.	Click or tap here to enter text.
7	Do you think any deferral of Covid costs should be i) within the 2020/2021 Charging Year only, ii) deferred to the 2021/2022 Charging Year or iii) deferred to 2022/2023 Charging Year or iv) deferred equally across the 2021/2022 and 2022/2023 Charging Years? Please provide rationale to support your response.	The deferral of costs should be across the 21/22 period as this will allow companies time to recover from the cost implications of Covid-19 before having to face the additional higher BSUoS costs. Both LGE and Leep believe that this should be adequate time for most consumers and that stretching the repayment time beyond this, risks further unknown complications.

8	<p>Do you consider it appropriate to smear the entire deferred Covid costs equally across the whole of a Charging Year e.g. 2021/2022 or target the deferred Covid costs to the equivalent Settlement Periods in 2020/21 in which Covid costs arose? If the charge was to be applied equally across a Charging Year should that be on a per Settlement period only basis or on a per MWh basis? Please provide rationale to support your response.</p>	<p>The deferred costs should be spread over the entire year on a per MWh basis. Spreading over the entire year will allow consumers to better manage their costs and prevent any users avoiding certain periods to avoid paying the additional Covid-19 costs. This will also be in line with current BSUoS charging and so be easier for consumers to understand.</p>
9	<p>Do you consider it appropriate to codify a capped figure for the Covid costs to be deferred? If so, based on the information available, what value do you believe it should be? Please provide rationale to support your response.</p>	<p>Click or tap here to enter text.</p>
10	<p>Do you agree that the period to be covered for deferral of Covid costs should be limited to those incurred up to 31 August 2020?</p>	<p>At this stage LGE and Leep would agree that costs should currently be limited to the 31st August, this is in line with the belief that many companies will be back to normal operating hours and processes by this date. This should be subject to review if government advice changes.</p>
11	<p>Do you think the impact of the Covid pandemic on BSUoS is sufficient to justify a different approach to charging BSUoS in advance of the second BSUoS Taskforce completing its work? Bearing in mind the short timescale for implementation do you agree with the approach in the option outlined above? Please provide a rationale with your response.</p>	<p>Click or tap here to enter text.</p>
12	<p>Do you agree with the financing options set out above? Is there</p>	<p>Click or tap here to enter text.</p>

	another way? Please provide rationale to support your response.	
13	Do you agree with the impacts we have set out in this Workgroup Consultation? Have we missed any impacted parties? Please provide details to support your response.	Click or tap here to enter text.