

**CUSC Workgroup Consultation Response Proforma****CMP334: Transmission Demand Residual – consequential definition changes (TCR)**

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](mailto:cusc.team@nationalgrideso.com) by **5pm on 15 April 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](mailto:paul.j.mullen@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com).

Respondent details	Please enter your details
<b>Respondent name:</b>	Simon Vicary
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**For reference the applicable CUSC objectives are:**

Relevant Objective
(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).

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

<b>Standard Workgroup Consultation questions</b>		
1	Do you believe that the CMP334 Original Proposal better facilitates the Applicable CUSC Objectives?	(a) Yes, as NGESO has been directed to raise this modification and implement its effects by the Authority. (b) Neutral (c) Neutral (d) Neutral
2	Do you support the proposed implementation approach for CMP334?	No. When Ofgem delivered their determination in November 2019, several months after the expected date, suppliers had assumed that an April 2021 implementation was unlikely. Now that CMP332 implementation has been delayed until April 2022 we expect the implementation approach for this mod to be revised accordingly.
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No, not at this time.
<b>Specific CMP334 Workgroup Consultation questions</b>		
5	Based on the mapping table in Annex 3, does the proposed CMP334 solution deliver Ofgem's TCR SCR Direction? Please identify any areas you believe need to be addressed?	Yes, we think the proposed CMP334 solution delivers Ofgem's TCR SCR Direction. We have not identified any areas we believe need to be addressed.
6	Do you agree with the proposed definition of "Single Site"? If not, why not.	Yes, this seems appropriate and consistent with the Authority TCR SCR Direction.
7	Do you agree with the proposed definition of "Final Demand Site"? If not, why not.	Yes, this seems appropriate and consistent with the Authority TCR SCR Direction. The legal text should be drafted to ensure that Users who own or operate a Distribution System covers both those that are licensed and licence exempt.

8.	Do you believe the Certification process described in the legal text is fit for purpose? If not, why not?	The proposed certification process will put a significant initial burden on Suppliers but will be manageable on an ongoing basis.
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