



11<sup>th</sup> March 2020

Dear Sirs,

**CMP317:**

**Identification and exclusion of Assets Required for Connection when setting Generator Transmission Network Use of System (TNUoS) charges**

**and:**

**CMP327:**

**Removing the Generator Residual from TNUoS Charges (TCR)**

Please find below our response to the workshop consultation.

Yours faithfully

A handwritten signature in black ink that reads "Alistair B Gray".

Alistair Gray  
Director

**Specific CMP317/327 questions**

Q	Question	Response
5	<p><u>Definition of physical assets required for connection to the system</u></p> <p>a) Do you agree with the three options identified in Section 4, Paragraphs 2.1-2.4? If so, which do you prefer, and why?</p> <p>b) Is there another option you think should be considered, and why? Please provide evidence if possible.</p>	<p>Option 1 – All local circuits (which includes all Island links). Answer NO, this definition is far too wide – these should not be part of the Exemption. Reason it would mean that important centres of renewable generation and physical infrastructure which elsewhere on the UK grid would be treated in a different (and discriminatory) way. It also runs contrary to the UK Government’s policy of Zero carbon by 2050 (2045 in Scotland) and to the identification of a ‘climate emergency’.</p> <p>Option 2 – Generator only spurs. Answer YES – if these are identified as for sole use of a generator to the MITS.</p> <p>Option 3 - Local circuits except pre-existing and shared assets. Answer – YES, where such circuits are NOT shared by more than 1 generator and/or distribution.</p>

10	<p>In section 4 paragraph 2.2.6 and 2.5.3, the workgroup has identified its proposed approaches to island links. Do you agree or disagree with any of these suggested approaches? Please provide justification.</p>	<p>That excluding the Charges for local circuits and substations in respect of Island Links, or other physical assets, used by demand or other generators, is not compliant with the Limiting Regulation (‘EU Cap’) – <b>Agree</b></p> <p>That <b>removing</b> Island Links from the Exclusion means (by 2024/5) table 2.5.3 a difference of 8% in averaged UK charges compared to table 2.5.2 where they are included in the Exclusion.</p>
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