

CUSC Alternative and Workgroup Vote

CMP340 - Consequential changes for CMP343 (TCR)

Please note: To participate in any votes, Workgroup members need to have attended at least 50% of meetings.

Stage 1 - Alternative Vote

If Workgroup Alternative Requests have been made, vote on whether they should become Workgroup Alternative Code Modifications.

Stage 2 - Workgroup Vote

2a) Assess the original and WACMs (if there are any) against the CUSC objectives compared to the baseline (the current CUSC).

2b) If WACMs exist, vote on whether each WACM better facilitates the Applicable CUSC Objectives better than the Original Modification Proposal.

2c) Vote on which of the options is best.

For reference the applicable CUSC objectives are:

- 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).*

Workgroup Vote

Stage 1 – Alternative Vote

Vote on Workgroup Alternative Requests to become Workgroup Alternative Code Modifications.

The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.

Should the majority of the Workgroup OR the Chairman believe that the potential alternative solution would better facilitate the CUSC objectives (against Baseline or the Original) then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative Code modification (WACM) and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.

“Y” = Yes

“N” = No

“-“ = Neutral

Workgroup Member	Company	Alternative 1 – CMP343 WACMs 6, 7 and 8	Alternative 2 – CMP343 WACM9
Eleanor Horn	National Grid ESO	Y	Y
Karl Maryon (Paul Bedford)	Haven Power Limited	Y	Y
Garth Graham	SSE	Y	Y
Simon Lord	Engie	Y	Y
Simon Vicary	EDF Energy	Y	Y
Robert Longden	Cornwall Insight	Y	Y
Grace March	Sembcorp	Y	Y
Lee Stone	E.ON	Y	Y
WACM ?		WACM1	WACM2

Stage 2a – Assessment against objectives

To assess the original and WACMs against the CUSC objectives compared to the baseline (the current CUSC).

You will also be asked to provide a statement to be added to the Workgroup Report alongside your vote to assist the reader in understanding the rationale for your vote.

ACO = Applicable CUSC Objective

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Eleanor Horn / Grahame Neale, National Grid ESO					
Original	Y	Y	-	Y	Y
WACM1	Y	Y	-	Y	Y
WACM2	Y	Y	-	Y	Y
Voting Statement: All of the options presented under CMP340 facilitate delivery of Ofgem’s TCR Direction and the associated benefits whilst ensuring the CUSC is fit for purpose. Therefore all the options are positive against ACO A, B and D and positive overall. All of the options are neutral against ACO C as there is no interaction with European Regulation 2009/714/EC.					

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Karl Maryon, Haven Power / Paul Bedford, Opus Energy					
Original	Y	-	-	Y	Y
WACM1	Y	-	-	Y	Y
WACM2	Y	-	-	Y	Y
Voting Statement: We believe that Applicable CUSC Objectives (ACO) a) and d) are better facilitated as the Original and WACM1 and WACM2 adds/amends the necessary definitions into the CUSC.					

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Garth Graham / Andrew Colley, SSE					
Original	Y	Y	-	-	Y
WACM1	Y	Y	-	-	Y
WACM2	Y	Y	-	-	Y
Voting Statement: The Original and the two WACMs ensure that the ten CMP343 options can be					

implemented into the CUSC depending upon which of those ten options the Authority's approves.

In terms of CMP340, the Original and the two WACMs are better in terms of Applicable Objectives (a) and (b) as they efficiently discharge the Authority's TCR SCR decision and facilitate effective competition (for the broad reasons the Authority set out in their November 2019 document). They are neutral in terms of (c) and (d).

For the reasons noted in my 'sister vote' for CMP343, the CMP340 Original is the better of the three options although there are positive attributes in the two WACMs (in the context of the associated CMP343 WACMs) which may lend themselves to the Authority.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Simon Lord / Andy Rimmer, Engie					
Original	Y	Y	-	-	Y
WACM1	Y	Y	-	-	Y
WACM2	Y	Y	-	-	Y

Voting Statement:

The Original and the two WACMs ensure that the ten CMP343 options can be implemented into the CUSC depending upon which of those ten options the Authority's approves.

In terms of CMP340, the Original and the two WACMs are better in terms of Applicable Objectives (a) and (b) as they efficiently discharge the Authority's TCR SCR decision and facilitate effective competition (for the broad reasons the Authority set out in their November 2019 document). They are neutral in terms of (c) and (d).

CMP340 Original is the best of the three options.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Simon Vicary / Binoy Dharsi, EDF					
Original	Y	Y	-	-	Y
WACM1	Y	Y	-	-	Y
WACM2	Y	Y	-	-	Y

Voting Statement:

The CMP340 Original and WACM's deliver the definitions required for the related Original and WACMs in CMP343.

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Robert Longden, Cornwall Insight					
Original	Y	Y	-	-	Y
WACM1	Y	Y	-	-	Y
WACM2	Y	Y	-	-	Y
<p>Voting Statement:</p> <p>The changes to the TDR are mandated by Ofgem and therefore all the alternatives seek to achieve this. Negative charges provide a perverse incentive and are not a desirable outcome. Making an adjustment through conflating locational charging and a fixed charge per day may “mitigate” this but is based upon a flawed principle, is overly complex and unjustified as a transitional measure. Therefore the original is the preferred solution.</p>					

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Grace March, Sembcorp					
Original	Y	-	-	Y	Y
WACM1	Y	-	-	Y	Y
WACM2	Y	-	-	Y	Y
<p>Voting Statement:</p> <p>The Original and all WACMs provide the support required for the corresponding solution to CMP343, which is in response to the Direction from the Authority and are therefore positive against ACOs(a) and (d).</p> <p>The definitions themselves have no direct impact on competition and are therefore neutral against ACO(b). While the definition of Shared Network Point is not immediately aligned with the various definitions surrounding a Final Demand Site”, it is necessary in order to ensure voltage-based bands are calculated correctly and users cannot game the methodology to be in a lower band.</p>					

Workgroup Member	Better facilitates ACO (a)	Better facilitates ACO (b)	Better facilitates ACO (c)	Better facilitates ACO (d)	Overall (Y/N)
Lee Stone, E.ON					
Original	Y	Y	-	Y	Y
WACM1	Y	Y	-	Y	Y
WACM2	Y	Y	-	Y	Y
<p>Voting Statement:</p> <p>I believe that CMP 340 original and the WACM's deliver the definitions required for CMP 343 and it's associated WACMs.</p>					

Stage 2b – WACM Vote (If required)

Where one or more WACMs exist, does each WACM better facilitate the Applicable CUSC Objectives than the Original Modification Proposal?

Workgroup Member	Company	WACM1	WACM2
Eleanor Horn	National Grid ESO	N	N
Karl Maryon	Haven Power Limited	N	N
Garth Graham	SSE	N	N
Simon Lord	Engie	N	N
Simon Vicary	EDF Energy	N	N
Daniel Hickman	Npower	Did not attend	Did not attend
Robert Longden	Cornwall Insight	N	N
Grace March	Sembcorp	N	N
Lee Stone	E.ON	N	N
Kyran Hanks	Waters Wye	Did not attend	Did not attend

Stage 2c – Workgroup Vote

Which option is the best? (Baseline, Proposer solution (Original Proposal), WACM1 or WACM2)

Workgroup Member	Company	BEST Option?	Which objective(s) does the change better facilitate? (if baseline not applicable)
Eleanor Horn	NGESO	Original	a, b, d
Karl Maryon	Haven Power Limited	Original	a, d
Garth Graham	SSE	Original	a, b
Simon Lord	Engie	Original	a, b
Simon Vicary	EDF Energy	Original	a, b
Robert Longden	Cornwall Insight	Original	a, b
Grace March	Sembcorp	Original	a, d
Lee Stone	E.ON	Original	a, b, d

Option	Number of voters that voted this option as better than the Baseline
Original	8
WACM1	8
WACM2	8