

CUSC Workgroup Consultation Response Proforma**CMP326 'Introducing a 'Turbine Availability Factor' for use in Frequency Response Capacity Calculation for Power Park Modules (PPMs)'**

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 22 February 2021**. 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.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Peter Dennis
Company name:	Ecotricity
Email address:	Peter.dennis@ecotricity.co.uk
Phone number:	01453769325

For reference the Applicable CUSC (non-charging) 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).*

For reference, the Electricity Balancing Guideline (EBGL) Article 3 (Objectives and regulatory aspects) are:

1. *This Regulation aims at:*

- (a) *Fostering effective competition, non-discrimination and transparency in balancing markets;*
- (b) *enhancing efficiency of balancing as well as efficiency of national balancing markets;*
- (c) *integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
- (d) *contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;*

- (e) ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;
- (f) facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;
- (g) facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.

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

CMP326 - Standard Workgroup Consultation questions		
1	Do you believe that the CMP326 Original Proposal better facilitates the Applicable Objectives? Please provide justification for your responses?	Yes, in that it facilitates effective competition within the MFR scheme.
2	Do you support the proposed implementation approach for CMP326?	Yes.
3	Do you have any other comments?	In the interests of non-discrimination and fostering effective competition, this change should also be applied to other ancillary services such as Firm Frequency Response to allow Power Park Modules to engage with that market.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	The above point regarding FFR is probably out of scope of this workgroup. If it is in scope however, then I would suggest an alternative also applies the same proposals appropriately across all ancillary services.
Specific Workgroup Consultation Questions		
5	Do you concur with the CMP326 Workgroup's initial conclusions as set out in the "Workgroup Considerations" section?	Yes.
6	Will the CMP326 Original Proposal impact on your business. If so, how?	Yes, we are introducing distributed PPMs that have not previously provided MFR to the Balancing Mechanism. Power Available and Turbine Availability is data we already collect and will supply it to the ESO from mid- March. It makes sense to make use of the data available in efficient operation of the system.

7.	Do you agree that CMP326 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the CUSC?	Yes.
8.	Do you have any comments on the impact of CMP326 on the EBGL objectives under Article 3?	As previously mentioned, to comply with the clause in EBGL Article 3 regarding effective competition, non-discrimination and transparency, this change should be applied equally across all Balancing Markets to allow PPMs to participate effectively.