

## Code Administrator Consultation Response Proforma

### CMP373: Deferral of BSUoS billing error adjustment

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 **12pm on 13 May 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](mailto:Paul.j.mullen@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com)

Respondent details	Please enter your details
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### For reference the Applicable CUSC (charging) Objectives are:

- 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 \*; and*
- e. *Promoting efficiency in the implementation and administration of the system charging methodology.*

*\*Objective (d) 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 in the right-hand side of the table below, including your rationale.

Code Administrator Consultation questions		
1	Do you believe that the CMP373 Original Proposal better facilitates the Applicable Objectives?	Yes, specifically with regards to objective (a). It avoids adverse impact on the Default Tariff Cap calculations and penalising (or benefiting) industry parties for the unexpected underbilling recovery. (Further outlined in Q2).
2	Do you support the proposed implementation approach?	<p>Yes we do. By recovering the costs in the FY 2021/2022 Settlement Final (SF) Run between 1 Oct 2021 to 31 Mar 2022 (as per the Original Proposal), the opportunity for the costs to be spread across all consumers (rather than a subset under RF runs) will become an option as it will align with Default Tariff Cap. This means consumers will be treated equally and avoid suppliers having to make up or absorb any unrecoverable costs.</p> <p>Using the dates as per the Original Proposal will also provide a reasonable notice period for future charges and avoid potential shock costs to end consumers.</p> <p>Whilst we would prefer targeted recovery costs to the users who incurred them, we understand that socialising the costs across users provides more assurance for BSUoS payers and will be easier to implement.</p>
3	Do you have any other comments?	No.