

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 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 or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Kat Renton
Company name:	Octopus Energy
Email address:	compliance@octoenergy.com
Phone number:	Click or tap here to enter text.

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?	<p>No,</p> <p>Any urgent Code Mod should seek to enable suppliers who are unable to pay the cost recovery to participate in a zero-interest payment deferral scheme.</p> <p>The Proposal aims to enable suppliers increase the price to customers in a future period. The Baseline protects end consumers and there is no merit in adjusting this.</p>
2	Do you support the proposed implementation approach?	No
3	Do you have any other comments?	<p>The desire for accuracy in the working group is welcome and is maintained through the Baseline approach.</p> <p>Had the error in ESO's activities have not occurred, parties would have incurred a larger BSUoS cost in 2020/2021 than they did in the SF run. The Baseline proposal, that recovers the costs through the RF run for 2020/21 is the only course of action to rectify the error and maintain the accurate and fair division of cost.</p>