

CUSC Alternative Form

CMP368 Alternative 17: Updating Charges for the Physical Assets Required for Connection, Generation Output and Generator charges for the purpose of maintaining compliance with the Limiting Regulation

Overview: This alternative is the same as the Original except that it includes any Generator TNUoS charges paid by Distributed Generators, and the associated volumes, in the Limiting Regulation range compliance calculation.

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What is the proposed alternative solution?

This alternative is the same as the Original except that it includes any Generator TNUoS charges paid by Distributed Generators of any size, and the associated volumes, in the Limiting Regulation range compliance calculation. Output from Distributed Generators is injected, via the distribution system (a network of privately-owned wires), onto the transmission system. Nothing in the Limiting Regulation excludes injection that is not directly onto the transmission system from the compliance calculation. If indirect injection is accepted as falling within the scope of the calculation as to Limiting Regulation range compliance calculation, there appears to be nothing special about which generators happen to have a BEGA, or which are licence-exemptable. The review of access and forward looking charges proposed that DG of more than or equal to 1 MW should be captured as being liable for TNUoS after its implementation date (which is not yet known). A limitation in this variant of CMP368 to make a distinction between Large Distributed Generation that has to pay GTNUoS and other Distributed Generation that has to pay GTNUoS, doesn't seem warranted.

What is the difference between this and the Original Proposal?

This alternative is the same as the Original except that it includes any Generator TNUoS charges paid by Distributed Generators, and the associated volumes, in the Limiting Regulation range compliance calculation.

What is the impact of this change?

Proposer's Assessment against CUSC Non-Charging Objectives	
Relevant Objective	Identified impact
(a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;	Positive Amends the definition of Physical Assets Required for Connection (the 'Connection Exclusion') to include the Generator TNUoS charges paid by Distributed Generators and the associated volumes in the Limiting Regulation range compliance calculation.
(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;	Neutral
(c) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and	Positive Improves GB alignment with European legislation for the Limiting Regulation range.

(d) Promoting efficiency in the implementation and administration of the CUSC arrangements.	Neutral
*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).	

When will this change take place?

Implementation date:

Same as the Original

Implementation approach:

Same as the Original

Acronyms, key terms and reference material

Acronym / key term	Meaning
CMP	CUSC Modification Proposal
TNUoS	Transmission Network Use of System

Reference material:

None.