

CUSC Alternative Form

CMP368 Alternative 18: 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 the TNUoS charges paid by all Embedded 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 all TNUoS charges (generation and demand) paid by Embedded Generators, and their associated volumes injected directly or indirectly to the transmission system, as well as TNUoS charges levied on station demand of transmission connected Generators, 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. There is no size exclusion within the Limiting Regulation; it is any producer who pays transmission charges.

Reference is made to the Workgroup Consultation response from ESB:

'As per the ENTSO-E Overview of Transmission Tariffs in Europe: Synthesis 2018 report: "Network users subject to transmission tariffs (either directly, via a transmission-related tariff component, or indirectly, via a part of the distribution tariffs) can be connected either to the transmission network or to the distribution network (indeed a distribution-connected network user benefits from the existence of the transmission network and is therefore usually called to contribute to its cost recovery)."

We also note that ACER Practice report on transmission tariff methodologies in Europe concludes the following: "ACER notes that in most jurisdictions (including DK, ES, FI, IE, PT, RO, SE) the calculation of annual total transmission tariff charges paid by producers includes both the relevant payments by producers connected at transmission level as well as those connected at the distribution level".'

The reference here is to **total** transmission tariffs. This appears to include all transmission charges levied on Generators as opposed to Final Demand and is therefore consistent with the treatment that has been the outcome of the TCR SCR which distinguishes between demand of generators (and storage) and end user demand when applying the transmission demand residual charge. For avoidance of doubt demand charges for storage are included with charges for station demand in the calculation of compliance with the Limiting Regulation.

What is the difference between this and the Original Proposal?

The Original excludes volumes and charges paid by Large Distributed Generators in line with Ofgem's direction to NGENSO. This Alternative views this outcome of the Original as not legally compliant with the Limiting Regulation.

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;	None: This mod is required for compliance with the Limiting Regulation.

