

**Code Administrator Consultation Response Proforma****CMP308: Removal of BSUoS charges from Generation**

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 **5pm on 31 August 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Joseph Henry at [joseph.henry2@nationalgrideso.com](mailto:joseph.henry2@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com)

Respondent details	Please enter your details
<b>Respondent name:</b>	Kit Dixon
<b>Company name:</b>	Good Energy
<b>Email address:</b>	Kit.dixon@goodenergy.co.uk
<b>Phone number:</b>	Click or tap here to enter text.

**I wish my response to be:**

(Please mark the relevant box)

 Non-Confidential Confidential

*Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.*

**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.*

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

Standard Code Administrator Consultation questions		
1	Do you believe that the CMP308 Original Proposal better facilitates the Applicable Objectives?	No comment.
2	Do you support the proposed implementation approach?	<p>My understanding from the consultation document that the process by which an SVA site would be determined as Non-Final Demand would be via a declaration made by the supplier – akin to what we have for post-TCR DUoS introduced under DCP 359 – a Certificate of Non-Final Demand is submitted to the DNO and they assign a new LLFC to that site marking it as NFD. Very similar to the storage declarations discussed in the consultation document.</p> <p>Does CMP 308 plan on introducing a separate declaration process for BSUoS (I can't see anything about it in the draft legal text so maybe it would need to be introduced afterwards via another mod?)? If so, has there been any discussion about why simply using the existing one introduced for DUoS would not be appropriate?</p> <p>The current process is onerous enough and needlessly repeating it would be an irresponsible use of industry time, and likely to cause errors where some sites have been declared as non-final demand for DUoS but not BSUoS, or vice versa. We see no practical reason why DNOs cannot simply pass the information they have already gathered onto elexon, instead of having suppliers repeat a separate process to communicate the same information to industry.</p>
3	Do you have any other comments?	For the purposes of DUoS, BSUoS and TNUoS, the futures of which all require some knowledge of what sites are final demand or otherwise, it would be beneficial to introduce a standardised data item on ECOES so that visibility of a sites status is available to all parties who require it.