

Workgroup 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 by 5pm on **26 April 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 Kavita Patel Kavita.Patel@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Katharina Birkner
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For reference the Applicable CUSC 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 subparagraphs (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 regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that CMP308 Original proposal better	Yes, the CMP308 Original proposal better facilitates the Applicable Objectives (a,c,e) and supports the recommendations from the Second BSUoS Task

	facilitates the Applicable Objectives?	Force that BSUoS should be paid by Final Demand only.
2	Do you support the proposed implementation approach?	We are supportive of the proposed implementation approach and wish to draw attention to the implementation plans for other BSUoS Reform CUSC modifications (CMP361 & CMP362). Due to the possibility of different approval dates, and therefore different CUSC baseline text being used, there is a chance a further modification will be required to ensure that the legal text works as intended across the three existing BSUoS reform modifications. Additionally, we would like to highlight that due to the urgent BSUoS mod CMP373, the legal text baseline currently being used for CMP308 may not be correct and may need to be updated before submission to Ofgem. This is not expected to impact the legal text changes.
3	Do you have any other comments?	For the avoidance of doubt, we'd like to clarify that the implementation approach for CMP308 is significantly different to the approach previously planned for CMP201. Amending the BSUoS charging base to include Final Demand only requires data and processes from a range of internal and external sources creating a more complex implementation approach. The ESO aims to implement CMP308 on a new ESO billing system to unlock process efficiencies.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Not at this time
Modification Specific Workgroup Consultation questions		
5	Please provide your thoughts on the Workgroup's discussions post reconvening after the outcome of the Second Balancing Services Charges Task Force. Is there anything else that the Workgroup may need to consider?	The ESO has no further comments to make which are not already captured in the workgroup report.
6	What are your thoughts on the	The ESO has no further comments to make which are not already captured in the workgroup report.

	<p>workgroup's discussions in regard to final demand data? Do you think the suggested solutions are appropriate? Please provide your rationale</p>	
7	<p>What are your thoughts on the draft legal text outlined in Annex 3? Please provide any comments you may have.</p>	<p>We don't have any further comments at this moment</p>