

Code Administrator Consultation Response Proforma**CMP377: Clarification of Section 14 BSUoS Charging Methodology**

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 **02 September 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 Ren Walker Lurrentia.walker@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Grace March
Company name:	Sembcorp Energy UK Ltd
Email address:	Grace.march@sembcorp.com
Phone number:	07554439689

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:

- 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;*
- 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);*
- 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;*
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- 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.

Standard Code Administrator Consultation questions		
1	Do you believe that the CMP377 Original Proposal better facilitates the Applicable Objectives?	Yes, it is positive against objective e)
2	Do you support the proposed implementation approach?	Yes.
3	Do you have any other comments?	<p>In 14.13.10, the use of BSUOSCoVIDjd / BSUoSCoVIDjd is inconsistent with the rest of the legal text, which uses BSUoSCoVID_{jd} (subscript jd). Along similar lines, BSUoSUR20d in 14.30.19 and its definition should use a subscript d. This is purely typographical.</p> <p>The use of subscript to indicate the time period is consistent within Section 14 Section 2 but not in associated definitions, e.g. LOCTRU_d and BSUoSINT_{jd}, compared to TotAdj_d and BSUoStariff_j. Corrections to those would probably be out of scope of this Mod but should be borne in mind for other Section 14 housekeeping modifications.</p>