

Code Administrator Consultation Response Proforma**CMP395: Cap BSUoS costs and Defer payment to 2023/24 to protect GB customers**

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 **16 September 2022**. 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 Paul Mullen Paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Ryan Ward
Company name:	ScottishPower Renewables
Email address:	Ryan.Ward@ScottishPower.com
Phone number:	07818538595

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*

- e. *Promoting efficiency in the implementation and administration of the system charging methodology.*

***The Electricity Regulation referred to in objective (d) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.*

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 Original Proposal and/or WACM1, WACM2, WACM3, WACM4 and WACM5 better facilitates the Applicable Objectives?	Mark the Objectives which you believe each solution better facilitates:
		Original <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		WACM1 <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		WACM2 <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		WACM3 <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		WACM4 <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		WACM5 <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		<p>SPR supports that each solution better facilitates against Objective A, and remain neutral on B, C, D and E.</p> <p>Recent developments have driven balancing costs to a level higher than what could have been forecast or expected. The proposed BSUoS cap could offer additional protection against the volatility expected over the winter period. A reduction in the risk premia, could feed through via some generators and suppliers to lower the costs faced by customers. The delayed cost could offer suppliers and generators that are struggling the opportunity to recover this portion of BSUoS back in potentially more favourable market conditions during 23/24. In order to maximise the potential benefit delivered to the consumer, SPR believe it is appropriate to set the cap at £15/MWh and support the relevant authority in increasing the cap above £250m, if deemed appropriate and/or the necessary funds are available. Therefore, SPR's preference is WACM5.</p>
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		N/A
3	Do you have any other comments?	<ul style="list-style-type: none"> - SPR are in support of the original cap of £15/MWh as this was the median of the most recent BSUoS forecast – Sept 22. - A lower cap could drive additional benefits to consumers. Previous mods (CMP345,

	<p>350 and 381) indicate that earlier caps have not fully utilised the full credit limit available.</p> <ul style="list-style-type: none">– Caps over £25/MWh could risk not enabling the full benefit potential.– SPR support Ofgem to raise the credit facility, if further funds were to be made available (<i>outside of the ESO</i>).– The ability to recover the deferred BSUoS costs in 23/24, will offer suppliers and generators the ability smooth BSUoS costs over the winter period.– SPR are not supportive of the ‘supplier’ only cap. A potential cap and associated benefits should be applied to all BSUoS payers applicable in the current charging year to avoid potential market distortions.– The pricing strategy utilised by suppliers and generators could enable or prevent any adjustment to BSUoS pricing assumptions, limiting parties ability to respond to the proposed cap.
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