

Workgroup Consultation Response Proforma

CMP379: Determining TNUoS demand zones for transmission-connected demand at sites with multiple Distribution Networks Operators (DNOs)

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 14 October 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 Catia Gomes on 07843816580, catia.gomes@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Tom Chevalier
Company name:	Power Data Associates Ltd
Email address:	Tom.Chevalier@PowerDataAssociates.com
Phone number:	01525 601202

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.*

**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 Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe original solution better facilitates:
		Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		No comment
2	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<p>The GSP Group areas align with the 14 DNO licenced areas. The DNO geographic areas are defined in the DNO licences back in 1989. The transmission zones should therefore align with these GSP Group areas. Any transmission connected load will fall into one of the DNO licenced areas.</p> <p>The transmission connected load should therefore be related to physical location of that load as determined by the DNO licenced area.</p> <p>Any other solution is liable to result in the connected load potentially 'moving' transmission areas if the balance of load changes at that connection point.</p> <p>The MOD should also reflect that the BSC allows the import or export to be settled in CVA or SVA trading arrangements. Where there is part of the load settled in SVA, then the GSP Group this must be allocated to the appropriate DNO licensed area.</p> <p>Despite the comment that the difference in charges may be "small", this may change over time and even a £1m saving is worth having by anyone. Locking the allocation to the geographic location of the plant/equipment minimises any opportunity for gaming or unnecessary investment 'to get across a boundary' into a cheaper zone.</p>
3	Do you have any other comments?	Click or tap here to enter text.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		Click or tap here to enter text.

Specific Workgroup Consultation questions

5	Do you agree with using the average methodology approach?	No comment
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