

Workgroup Consultation Response Proforma**CMP392: Transparency and legal certainty as to the calculation of TNUoS in conformance with the Limiting Regulation**

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 **5 May 2023**. 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 terri.puddefoot@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:

- 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 CMP392 Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the Original solution better facilitates:				
		<table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A</td> <td><input checked="" type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input checked="" type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> </table> <p><u>Objective A</u> Positive - The additional transparency & legal certainty offered will enable stakeholders to better understand the methodology and how charges are treated by the ESO, better enabling, and facilitating competition.</p> <p><u>Objective B</u> Positive - The proposal will better ensure that the CUSC calculation is carried out in a manner which it was designed to reflect the costs. It will also allow stakeholders better visibility and the opportunity to challenge where necessary.</p> <p><u>Objective C</u> <i>Neutral</i></p> <p><u>Objective D</u> Positive – Providing transparency and visibility, particularly around parameters used within the calculation will help ensure users charges remain within the Limiting Regulation (European Commission Regulation 838/2010).</p> <p><u>Objective E</u> <i>Neutral</i></p>	Original	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C
Original	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input type="checkbox"/> E	
2	Do you support the proposed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				

	implementation approach?	Implementation 10 Business days after authority decision is deemed reasonable.
3	Do you have any other comments?	CMP392 will not trigger a tariff change. However, it will offer additional transparency and certainty around the calculation & output.
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
		N/A

Specific Workgroup Consultation questions

5	Do you agree that the proposed methodology and data should be published in full?	<p>Yes, we believe the proposed methodology and data should be published in full.</p> <p>All efforts to improve transparency and legal certainty are welcomed by industry, as this provides additional confidence in the methodology. The ESO publishing the calculation methodology and outputs will better enable users to challenge, where appropriate.</p>
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