

Code Administrator 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 **04 September 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 Teri Puddefoot terri.puddefoot@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details	
Respondent name:	Garth Graham	
Company name:	SSE Generation	
Email address:	Garth.graham@sse.com	
Phone number:	01738 456000	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

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;*

- 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 Code Administrator Consultation questions		
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	Mark the Objectives which you believe the proposed solution(s) better facilitates:
		Original <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D <input checked="" type="checkbox"/> E
		WACM1 <input 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 checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D <input checked="" type="checkbox"/> E
<p>Original</p> <p>As the Proposer of the Original, we believe that the case for this change; in terms of better facilitating the Applicable Objectives (a), (b), (d) and (e) whilst being neutral in terms of (c); has been detailed in the Proposal form itself (as well as on pages 14-15 of this consultation document) which, for sake of brevity, we refrain from repeating here.</p> <p>Overall, the Original is 'Best' of the four options (Original, two WACMs and Baseline).</p> <p>WACM1</p> <p>This Alternative fails to ensure transparency of the relevant detailed information regarding the calculation of charges that are needed by relevant parties to ensure legal certainty of how assets have been determined as either pre-existing or assets required for connection. As such it does not better facilitate the Applicable CUSC Objectives (a), (b), (d) or (e), whilst being neutral in terms of (c).</p> <p>WACM2</p> <p>This proposal combines the aspects of the Original with those of WACM1 and as such (and only by virtue of being based on the Original) it better facilitates meeting Applicable Objectives (a), (b), (d) and (e), whilst being neutral in term so (c), for the reasons set out in the (Original) Proposal form (as well as on pages 14-15 of this consultation document).</p>		
2	Do you have a preferred proposed solution?	<input checked="" type="checkbox"/> Original <input type="checkbox"/> WACM1 <input type="checkbox"/> WACM2 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference

		Click or tap here to enter text.
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes, we support the proposed implementation approach.
4	Do you have any other comments?	<p>This change is required in order to provide stakeholders with the necessary information to ensure, in an open and transparent way, that the charges they are paying are fully in compliance with the Limiting Regulation.</p> <p>The proposed guideline (WACM1) from the ESO does not ensure this and does not, for example, ensure that the <u>actual calculation</u> of the tariffs; in the terms of pre-existing assets or assets required for connection; is fully visible to all (in school mathematics terms, all we are asking of the ESO is to 'show your working').</p> <p>The Original (and WACM2) is designed to ensure the ESO does 'show your working' when it comes to pre-existing assets or assets required for connection.</p>