

Code Administrator Consultation Response Proforma

CMP415: Amending the Fixed Price Period from 6 to 12 months

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 **13 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 cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Niall Coyle	
Company name:	E.ON UK	
Email address:	Niall.coyle@eonenergy.com	
Phone number:	07824369037	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input checked="" 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 (non-charging) Objectives are:

- a) *The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- b) *Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;*
- c) *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- d) *Promoting efficiency in the implementation and administration of the CUSC arrangements.*

**The Electricity Regulation referred to in objective (c) 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 type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		WACM1 <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D
		<p>Against the current CUSC baseline, we believe this proposal does not better facilitate the CUSC charging objectives (as it would increase the combined fixed notice period to 21-months, which is undesirable).</p> <p>However, if CMP408 were implemented to become the CUSC baseline, then CMP415 would better facilitate objective b, as maintaining the 15-months fixed/notice period recommended by the BSUoS task force would facilitate effective competition in electricity supply.</p> <p>It is therefore our view that neither CMP408 or CMP415 should be implemented, and that the current CUSC baseline of 9N6F is the optimum fixed BSUoS charging methodology.</p>
2	Do you have a preferred proposed solution?	<input checked="" type="checkbox"/> Original <input checked="" type="checkbox"/> WACM1 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		<p>Our preferred option is for the current CUSC baseline for both Section 14 and Section 11 to be maintained, therefore maintaining the current 9N6F approach. However, if Ofgem feel it necessary to approve CMP408 then we strongly urge Ofgem to also approve either CMP415 original or WACM1.</p> <p>We believe maintaining the 15-months combined fixed/notice period is paramount to the success of the fixed BSUoS charging methodology, and that approving CMP408 in isolation would completely erode the benefits of CMP361/2.</p>
3	Do you support the proposed	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	<p>implementation approach?</p>	<p>Should both CMP408 and CMP415 be approved, we believe they should both be implemented for the next tariff period for which the final tariffs are yet to be published. We do not support re-publishing a new fixed tariff to be effective from Apr-24, as this is likely to cause confusion to customers in what is already a volatile market environment, and may have already made decisions on the back of the final tariff publication issued by National Grid ESO on 30th June.</p>
<p>4</p>	<p>Do you have any other comments?</p>	