

Code Administrator Consultation Response Proforma**CMP286 & CMP287: Improving TNUoS Predictability through Increased Notice of the Target Revenue & Inputs used in the TNUoS Tariff Setting Process**

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 **1 November 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 Jennifer Groome paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Simon Vicary
Company name:	EDF Energy Customers Limited
Email address:	simon.vicary@edfenergy.com
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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.

CMP286 & CMP287**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. To promote 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 CMP286 & CMP287 Code Administrator Consultation questions		
1	Do you believe that the CMP286 & CMP287 Original Proposal and/or WACM1, better facilitates the Applicable Objectives?	Yes, EDF Energy supports this modification as both the Original and WACM1 will lower risk premia applied to consumer contracts by extending the stability of certain parameters. This is supported with quantifiable evidence through the RFI conducted by NGESO.
2	Do you support the proposed implementation approach?	Yes, although we would welcome this sooner the implementation date of 31 st December 2023, with an effective date of 1 st April 2025, is appropriate.
3	Do you have any other comments?	Certainty of TNUoS charges is a significant issue for consumers, suppliers and generators. Whilst we support this modification, in that it extends the stability of certain parameters, we believe further action is required and expect this to be taken forward through the TNUoS taskforce as a matter of urgency.