

Workgroup Consultation Response Proforma**CMP425: Billing Demand Transmission Residual By Site**

Respondent details	Please enter your details	
Respondent name:	Arjan Geveke	
Company name:	Energy Intensive Users Group	
Email address:	director@eiug.co.uk	
Phone number:	07951387408	
Which best describes your organisation?	<input checked="" type="checkbox"/> Consumer body <input checked="" type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input checked="" 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;*
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- 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 facilitate the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <p>Original <input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input checked="" type="checkbox"/>E</p> <p>The current charging arrangements lead to overcharging certain customers on shared TO connected sites and disincentivise them from choosing their own supplier rather than sharing one. This reduces competition in the supply market in terms of number of suppliers and the quality of supply contracts. The proposed modification avoids limiting effective competition in the supply of electricity.</p> <p>The current arrangements charge parties of the same size different amounts if they choose their own Supplier and the proposed modification better reflects actual costs.</p> <p>The proposed modification makes TNUoS charges clearer and more cost reflective for both NGESO and customers.</p>
2	Do you support the proposed implementation approach, notably the date?	<p><input checked="" type="checkbox"/>Yes <input checked="" type="checkbox"/>Implement ASAP <input type="checkbox"/>No <input type="checkbox"/>Implement 2025 <input type="checkbox"/>No preference</p> <p>Implementation as soon as possible will charge customers correctly thereby avoiding possible detrimental impact on their financial position.</p>
3	Do you have any other comments, including any learnings from similar issues?	There was a similar issue on the demand flexibility service (DFS) side – behind the boundary asset metering – which NG ESO has addressed for this winter.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>
5	Do you consider your organisation to be impacted by this modification?	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>Not directly, but certain members might be.</p>