Code Administrator Consultation Response Proforma

CMP315: TNUoS Review of the expansion constant and the elements of the transmission system charged for and

CMP375: Enduring Expansion Constant & Expansion Factor Review

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 **15 December 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 Andrew Hemus Andrew.Hemus@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Simon Lord	
Company name:	Engie	
Email address:	Simon.lord@engie.com	
Phone number:	07980 793692	
Which best describes your organisation?	☐Consumer body ☐Demand ☐Distribution Network Operator ☒Generator ☐Industry body ☐Interconnector	☐Storage ☐Supplier ☐System Operator ☐Transmission Owner ☐Virtual Lead Party ☐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:

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 Code Administrator Consultation questions			
1	Please provide your assessment for the proposed CMP315 solution against the Applicable Objectives?	Mark the Objectives which you believe the proposed solution better facilitates:	
		Original	☐A ☐B ☐C ☐D ☐E
		The Baseline is preferred We do not support 315 as it includes nonlocational elements. These elements are needed for all connection and are not affected by the location of generator connections. We do not believe they are a differentiator between connection points	
2	Please provide your assessment for the proposed CMP375 solutions against the Applicable Objectives?	Mark the Objectives which you believe the proposed solutions better facilitates:	
		Original	☒A ☒B ☒C ☐D ☐E
		WACM2	☒A ☒B ☒C ☐D ☐E
		The difference between CMP 375 and its alternative are relatively small and only reflect the forward-looking element of the charge. We prefer Original CMP 375 as in the longer term it is likely to deliver a greater level of stability	
3	Do you have a preferred proposed solution?	☐CMP315 Original ☒ CMP375 Original ☐WACM2 ☐Baseline ☐No preference	
		Click or tap here to enter text.	

4	Do you support the proposed implementation approach?	☒Yes ☐No
		Click or tap here to enter text.
5	Do you have any other comments?	No