

**Code Administrator Consultation Response Proforma**

**CMP286: Improving TNUoS Predictability Through Increased Notice of the Target Revenue 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](mailto:cusc.team@nationalgrideso.com) by **5pm on 05 January 2024**. 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 Catia Gomes [catia.gomes@nationalgrideso.com](mailto:catia.gomes@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com).

Respondent details	Please enter your details	
<b>Respondent name:</b>	Stephen Dale	
<b>Company name:</b>	National Grid ESO	
<b>Email address:</b>	Stephen.dale1@nationalgrideso.com	
<b>Phone number:</b>	Click or tap here to enter text.	
<b>Which best describes your organisation?</b>	<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 type="checkbox"/> Supplier <input checked="" 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:**

- 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 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 <input type="checkbox"/> E
		WA(G)CM1 <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		It is our opinion that the CUSC objectives are either better served by the baseline or not improved upon by the proposal.
2	Do you have a preferred proposed solution?	<input type="checkbox"/> Original <input type="checkbox"/> WA(G)CM1 <input checked="" type="checkbox"/> Baseline
		If the fixed Inputs changes were to progress, then the ESO would prefer WA(G)CM1 as adopting this option has little impact on the proposer’s objectives but represents a significant risk reduction to ESO cashflow.
3	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		Implementing these changes is stated as improving competition however as suppliers all operate under the same rules its unclear why. The level of risk premia a supplier applies to sales is a judgement call as with any other business decision. This modification provides certainty for suppliers, by transferring risk to the TO’s,.

		<p>Assuming risk premia is removed from contracts, any fluctuation in costs will remain as accrued TO costs until the reconciliation over subsequent years.</p>
<p>4</p>	<p>Do you have any other comments?</p>	<p>This approach is stated as providing benefits to consumers as it facilitates an option to lower or remove risk premia from customers on Fixed Term, fixed price agreements, however.</p> <ul style="list-style-type: none"> <li>• Analysis indicates it only benefit consumers on FP agreements up to 2 years.</li> <li>• if prices rise it defers increased costs for later periods, further increasing prices in the future.</li> <li>• Extends the reconciliation period out to 3 years adding complexity to the calculations.</li> <li>• will potentially add cost to the consumer by way funding the TO cost of capital.</li> </ul> <p>Unless WA(G)CM1 is adopted the proposal will place additional risk on the ESO cash flow for no benefit.</p>