

Workgroup Consultation Response Proforma**CMP428: User Commitment liabilities for Onshore Transmission circuits in the Holistic Network Design**

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 **21 March 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 cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Anthony Cotton	
Company name:	Energy Technical & Renewable Services Ltd	
Email address:	tony@energytechnical.com	
Phone number:	07774102942	
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 type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input checked="" type="checkbox"/> Other

I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (*this will be shared with industry and the Panel for further consideration*)

☐ **Confidential** (*this will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration*)

For reference the Applicable CUSC (non-charging) Objectives are:

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- 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;*
- 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 Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe the Original solution better facilitates:</p> <p>Original <input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D</p> <p>Click or tap here to enter text.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
3	Do you have any other comments?	<p>Can the proposer confirm that the intention is for the cost of Excluded Works to go into the Wider Cancellation Charge? I appreciate that a detailed consideration of wider works and application of the Wider Cancellation Charge is out of scope, however excluding one class of work from Attributable has the effect of the putting the cost of that into Wider, affecting all generation developers who have passed the Trigger Date and all Users who are operational and subsequently cancel agreements without adequate notice.</p> <p>Assuming this is intentional, the second paragraph of the Executive Summary is misleading, it should say “and therefore not be included in <u>that part of</u> the User Commitment liabilities <u>(although they will still fall in the Wider User Commitment liabilities faced by all Users)</u>. Whilst this may be inferred from reading through the rest of the report, I think it should be highlighted in the summary.</p> <p>I also think the drafting of the change to the definition of Attributable Works is confusing, I would suggest the new text “but excluding in each case any [Excepted Works]” goes <u>before</u> “and which in relation to a particular User are as specified in its Construction Agreement”</p>

4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/> No
---	--	--

Specific Workgroup Consultation questions		
5	Does the solution help provide better cost reflectivity for liabilities?	Click or tap here to enter text.
6	Do you agree the title of this modification should be changed to 'User Commitment liabilities for Onshore Transmission (reinforcement) in the Holistic Network Design'?	I think a clearer title would be "User Commitment liabilities for Onshore Transmission (reinforcement) <u>classified as such</u> in the Holistic Network Design'?