

Code Administrator Consultation Response Proforma

CMP430: Adjustment to TNUoS Charging from 2025 to support the Market Wide Half Hourly Settlement (MHHS) Programme

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 12 August 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 deborah.spencer@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Neil Dewar	
Company name:	National Grid ESO	
Email address:	Neil.dewar@nationalgrideso.com	
Phone number:	07749 576 710	
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 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 (*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 Panel or the industry for further consideration*)

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?	<p>Mark the Objectives which you believe the proposed solution(s) 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>Objective A</p> <p>This CUSC change, aligns with the MHHS Programme migration of MPANs, facilitating delivery according to the MHHS milestones. This should support Suppliers’ migration in an orderly and timely manner. Consequently, it facilitates MHHS Programme consumer benefits such as more dynamic tariffs and increased competition from Suppliers migrating early in the migration window.</p> <p>Objective B</p> <p>This solution maintains the existing locational demand charging methodologies but introduces segmentation between the methodologies based on metering characteristics, rather than a demand threshold (100kW).</p> <p>The solution reduces the risk of double charging compared to the baseline and provides clarity to Suppliers in order for them to plan migration for specific at risk MPANs to avoid double charging.</p>

		<p>Objective E</p> <p>The proposed solution is enduring rather than following the same approach as the series of previous modifications to address double charging issues with reference to Measurement Class which had end dates. It therefore better facilitates Objective E than the baseline.</p>
2	Do you have a preferred proposed solution?	<input checked="" type="checkbox"/> Original <input type="checkbox"/> Baseline <input type="checkbox"/> No preference <p>Click or tap here to enter text.</p>
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Click or tap here to enter text.</p>
4	Do you have any other comments?	<p>ESO supports CMP430 as it will align CUSC with the MHHS baselined design within the required Programme timelines.</p> <p>This modification, if approved, should be on an enduring basis until such time as the TNUoS TaskForce or other Modifications introduce wider scale changes to TNUoS Charging.</p> <p>There will be minimal implementation costs to ESO for implementation of CMP430. ESO have reported the implementation and ongoing costs related to CR032 as part of the Programme Participant Information Request (PPIR).</p>

If you wish to provide any further information on costs/impacts to your organisation, please ensure that they are as a direct result of the Modification (CMP430). If confidential, these can be provided directly to the Authority. Implementation or ongoing costs incurred relating to the wider MHHS delivery could have been reported under the [Ofgem Cost Analysis Programme Participant Information Request \(PPIR\)](#) to feed into Authority-led SCR Modifications that are planned to be raised to introduce the new MHHS arrangements.