

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:	Simon Vicary	
Company name:	EDF Energy Customers Limited	
Email address:	simon.vicary@edfenergy.com	
Phone number:	07875110961	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input checked="" type="checkbox"/> Storage <input checked="" 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 (*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?	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
		The modification is neutral against objectives A, B, C and D. It is currently mildly negative against objective E.
2	Do you have a preferred proposed solution?	<input checked="" type="checkbox"/> Original <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		On balance, we support the Original proposed solution identified. We acknowledge that the limitation to the Original solution provides a risk of some MPANS being double charged TNUoS. A separate reporting process that identifies any MPANS at risk of double charging is welcomed which should aid mitigating occurrences of this happening during the migration process.
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		If implemented, the change should be enduring unless and until deliberately replaced by any successor modification (i.e. TNUoS Taskforce proposals or REMA).
4	Do you have any other comments?	There is expected to be a financial impact on our business from this change. This is currently difficult to estimate as it will depend on the number of customers impacted and to what extent there are any portfolio offsets (e.g. are there similar numbers of customers with

		similar consumption patterns moving from Triad charging to 4-7pm TNUoS charging and vice versa). This financial impact (if material) would be a one-off on initial implementation of the proposal and would not be repeated from April 2026.
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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.