# CUSC Workgroup Consultation Response Proforma

**CMP288 ‘Explicit charging arrangements for customer delays and backfeeds’**

**and**

**CMP289 ‘Consequential change to support the introduction of explicit Charging arrangements for customer delays and backfeeds via CMP288’**

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 by **31 January 2019** to [cusc.team@nationalgrid.com](mailto:cusc.team@nationalgrid.com) Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Shazia Akhtar at Shazia.akhtar2[@nationalgrid.com](mailto:caroline.wright@nationalgrid.com)

These responses will be considered by the Workgroup at their next meeting at which members will also consider any Workgroup Consultation Alternative Requests. Where appropriate, the Workgroup will record your response and its consideration of it within the final Workgroup Report which is submitted to the CUSC Modifications Panel.

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| --- | --- |
| **Respondent:** | *Please insert your name and contact details (phone number or email address)* |
| **Company Name:** | *Please insert Company Name* |
| Please express your views regarding the Workgroup Consultation, including rationale.  (Please include any issues, suggestions or queries) | **For reference, the Applicable CUSC Objectives for the Use of System Charging Methodology 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’ transmissionbusinesses;  (d) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency. These are defined within the National Grid Electricity Transmission Plc Licence under Standard Condition C10, paragraph 1\*; and  (e) Promoting efficiency in the implementation and administration of the CUSC arrangements.  \*Objective (d) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER). **The Applicable Standard CUSC objectives are:**  (a) The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;  (b) 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;  (c) 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.  \*Objective (c) refers specifically to European Regulation 2009/714/EC. Reference to the Agency is to the Agency for the Cooperation of Energy Regulators (ACER). |

**Standard Workgroup consultation questions**

| **Q** | **Question** | **Response** |
| --- | --- | --- |
| 1 | **Do you believe that CMP288 and CMP289 Original proposals, better facilitates the Applicable CUSC Objectives?** |  |
| 2 | **Do you support the proposed implementation approach?** |  |
| 3 | **Do you have any other comments?** |  |
| 4 | **Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?** | *If yes, please complete a WG Consultation Alternative Request form, available on National Grid's ESO website[[1]](#footnote-1), and return to the CUSC inbox at* [*cusc.team@nationalgrid.com*](mailto:cusc.team@nationalgrid.com) |

**Specific questions for CMP288 and CMP289**

| **Q** | **Question** | **Response** |
| --- | --- | --- |
| 5 | **Do you believe this consultation covers all the relevant interactions between other liability/charging mechanism currently in place in addition to cancelation and connection charge? If not, please can you provide further information.** |  |
| 6 | **Do you agree with the scope of the works which are proposed to be used to calculate the charge?** |  |
| 7 | **Do you agree with the proposed level of granularity, timing of the proposed information exchange and the period it covers?** |  |
| 8 | **Do you agree with the proposed quarterly reporting of/provision of milestones?** |  |
| 9 | **Do you believe the report has captured all the cross code/licence issues relevant to these modifications?** |  |
| 10 | **Do you agree that the wording of the CUSC should be amended to clarify that one-off charges will be issued to recover additional incremental costs incurred to facilitate a User requested delay or backfeed? If so, do you think this should include a list of example such one off costs that can be incurred for delays and backfeeds?** |  |
| 11 | **Do you support either of the solutions proposed for calculating financing charges in relation to shared and wider enabling works? Do you have another solution which may be better?** |  |
| 12 | **Do you agree with the proposed approach that the delay/backfeed charges should be paid as the costs are incurred? Or do you feel they should be paid in an alternative timeframe (e.g. the point of connection)?** |  |
| 13 | **Do you agree with the one month deadline to notify the TO of an intention to delay, to allow the TO to reassess its investment strategy?** |  |
| 14 | **Do you agree that individual TOs’ regulated Weighted Average Cost of Capital (WACC) should be used as the financing rate to calculate the proposed financing charges?** |  |

1. <https://www.nationalgrideso.com/codes/connection-and-use-system-code-cusc/cusc-modifications> [↑](#footnote-ref-1)