

CUSC Workgroup Consultation Response Proforma**CMP334: Transmission Demand Residual – consequential definition changes (TCR)**

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 15 April 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation please contact Paul Mullen at paul.j.mullen@nationalgrideso.com or cusc.team@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Lorna Mallon
Company name:	ScottishPower Energy Whole and Energy Retail
Email address:	Lorna.mallon@scottishpower.com
Phone number:	0141 614 1163

For reference the applicable CUSC objectives are:

Relevant Objective
(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).

Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the CMP334 Original Proposal better facilitates the Applicable CUSC Objectives?	Yes
2	Do you support the proposed implementation approach for CMP334?	Yes
3	Do you have any other comments?	Yes – we believe consideration has to be made of how the TCR suite of changes can be communicated / explained to customers. These are complex changes that suppliers will struggle to understand themselves. We believe it will help customers if a single source of information could be created (e.g. via DCUSA website, ENA, National Grid or at a DNO level). Given the impact on contracts / tariffs being negotiated now we believe this has to be done in line with the DCUSA change proposals implementation dates.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
Specific CMP334 Workgroup Consultation questions		
5	Based on the mapping table in Annex 3, does the proposed CMP334 solution deliver Ofgem's TCR SCR Direction? Please identify any areas you believe need to be addressed?	Yes
6	Do you agree with the proposed definition of "Single Site"? If not, why not.	Yes, however we would suggest that the definitions are only held in one code to avoid any divergence in the future. We have no preference in the leading code.
7	Do you agree with the proposed definition of	Yes, however we would suggest that the definitions are only held in one code to avoid any divergence in

	"Final Demand Site"? If not, why not.	the future. We have no preference in the leading code.
8.	Do you believe the Certification process described in the legal text is fit for purpose? If not, why not?	Yes