

**CUSC Code Administrator Consultation Response Proforma****CMP317 - Identification and exclusion of Assets Required for Connection when setting Generator Transmission Network Use of System (TNUoS) charges; and CMP327 - Removing Generator Residual Charges from TNUoS (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](mailto:cusc.team@nationalgrideso.com) by **5 pm** on **20 July 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Panel.

If you have any queries on the content of this consultation, please contact Joe Henry [joseph.henry2@nationalgrideso.com](mailto:joseph.henry2@nationalgrideso.com) or [cusc.team@nationalgrideso.com](mailto:cusc.team@nationalgrideso.com).

| Respondent details      | Please enter your details |
|-------------------------|---------------------------|
| <b>Respondent name:</b> | Catalina Guillen Rozo     |
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Please express your views on the right-hand side of the table below, including your rationale.

| Standard Code Administrator Consultation questions |   |   |
|--|---|---|
| 1  | Do you believe that the CMP317/327 Original solution or any WACMs better facilitate the Applicable CUSC Objectives? | <p>The €0/MWh <b>facilitates compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency</b>. These are defined within the National Grid Electricity Transmission Plc Licence under Standard Condition C10, paragraph 1</p> <p>Compliance with the use of system charging methodology if the target is set at €0/MWh <b>facilitates effective competition in the generation and supply</b> of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity. (see 4 below)</p>    |
| 2  | Do you support the proposed implementation approach?  | TCR changes of TNUoS and DUoS have been postponed and will be implemented in 2022. TGR implementation date should be compliant with the notice to generators and in line with TCR implementation to avoid distortions.  |
| 3  | Do you have any other comments?   | See below   |
| 4  | <p>€2.5/MWh is a cap rather than a target</p> <p>Our preferred option is €0/MWh</p>                                 | <p>€0/MWh would lead to less ex-post and ex-ante adjustments in the future</p> <p>€0/MWh included would help generators to forecast charges, increasing investment and deployment of storage and renewable generation</p> <p>€0/MWh would achieve comparability with embedded generation</p> <p>€0/MWh would ensure that average transmission Charges for generation in GB are closer to the limit set for the majority of Member States under the Limiting Regulation</p> <p>In terms of cross border trade, targeting €0/MWh would level the playing field in terms of comparability with other Member State markets.</p> |