

Code Administrator Consultation Response Proforma**CMP371: Assessing CUSC Modification Proposals against charging and standard objectives**

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 2 June 2021**. 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 Ren Walker Lurrentia.walker@nationalgrideso.com or cusc.team@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Grace March
Company name:	Sembcorp Energy UK
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I wish my response to be:

(Please mark the relevant box)

☒ Non-Confidential☐ Confidential

Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

For reference the Applicable CUSC (non-charging) Objectives are:

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
- 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;*
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency *; and*
- 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 in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions		
1	Do you believe that the CMP371 Original Proposal better facilitates the Applicable Objectives?	<p>Yes against ACO(e). In practice, the discussions within a Joint Workgroup and Panel do not generally draw a distinction between the two sets of ACOs as the concepts behind solutions usually affect both and are considered together. Raising two modifications creates an unnecessary administrative burden on potential proposers and industry stakeholders.</p> <p>It may have the secondary effect of reducing the instances where Ofgem have multiple Modifications awaiting Authority decision, where only one decision is required in practice. This will make the process beyond the CUSC panel more transparent for industry.</p>
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	<p>It will important, especially at first, for the Code Admin to make sure participants understand the differences between the two sets of ACOs, both in their Critical Friend Role (identifying which elements of a proposal go against which ACOs) and whilst chairing Workgroups to ensure members understand the voting process. Since they already do this satisfactorily when helping proposers divide a Mod up into charging and non-charging, and during Workgroup votes, this is unlikely to be a problem.</p>