Workgroup Consultation Response Proforma

**CMP393: Using Imports and Exports to Calculate Annual Load Factor for Electricity Storage**

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 **02 June 2023**. 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 jessica.rivalland@nationalgrideso.com or cusc.team@nationalgrideso.com

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| --- | --- |
| **Respondent details** | **Please enter your details** |
| **Respondent name:** | Click or tap here to enter text. |
| **Company name:** | Click or tap here to enter text. |
| **Email address:** | Click or tap here to enter text. |
| **Phone number:** | Click or tap here to enter text. |
| **Which best describes your organisation?** | [ ] Consumer body[ ] Demand[ ] Distribution Network Operator[ ] Generator[ ] Industry body | [ ] Interconnector[ ] Storage[ ] Supplier[ ] Transmission Owner[ ] Virtual Lead Party[ ] Other |

**I wish my response to be:**

|  |  |  |
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| (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 (charging) Objectives are:**

1. *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;*
2. *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);*
3. *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;*
4. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*; and*
5. *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.**

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| **Standard Workgroup Consultation questions** |
| 1 | Do you believe that the Original Proposal facilitates the Applicable Objectives? | Mark the Objectives which you believe the Original Solution facilitates: |
| Original | [ ] A [ ] B [ ] C [ ] D [ ] E [ ] F [ ] G |
| Click or tap here to enter text. |
| 2 | Do you support the proposed implementation approach? | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 3 | Do you have any other comments? | Click or tap here to enter text. |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?  | [ ] Yes[ ] No |
| Click or tap here to enter text. |

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| **Specific Workgroup Consultation questions** |
| 5 | Do these potential options better facilitate the charging objectives than the original proposal and if so, why? | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 6 | Should Storage ALF be floored at zero? | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 7 | Would CMP393 disincentivise storage from locating in the south? | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 8 | Should storage have its own generation classification for TNUoS? | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 9 | Should CMP393 apply only to storage or to all generation? | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 10 | How, if at all, does the proposed methodology interact with demand TNUoS charging? | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 11 | Does the proposed solution have any materially different impact on battery storage compared to pumped storage that should be considered (While taking into account the proxy nature of TNUoS)? | [ ] Yes[ ] No |
| Click or tap here to enter text. |