Transmission Charging Methodologies Forum and CUSC Issues Steering Group

Meeting 135 - 08 June 2023

# Agenda

1	Introduction, meeting objectives and review of previous actions Claire Huxley - ESO	10:30 - 10:35
2	Code Administrator update Milly Lewis - Code Administrator ESO	10:35 - 10:45
3	TCMF Sub-group – Enduring Fixed BSUoS verbal update Alice Taylor - ESO	10:45 - 10:55
4	TNUoS Task Force verbal update Nicola White - ESO	10:55 - 11:00
5	TNUoS 10yr Forecast Jo Zhou - ESO	11:00 - 11:10
6	Operation of SVCs and TNUoS charges Giulia Licocci - Ocean Winds	11:10 - 11:25
7	GB Connections Reforms verbal update Mike Oxenham - ESO	11:25 - 11:35
7	VAT Treatment of Embedded Export Tariff Nick George - ESO	11:35 - 11:50
8	Improvement to TDR Invoice Supporting Information Nick George - ESO	11:50 - 11:55
9	Securities for Connections Alison Price - ESO	11:55 - 12:05
11	AOB and Meeting Close Claire Huxley - ESO	12:05 - 12:15

# **TCMF** Objective and Expectations

#### Objective

Develop ideas, understand impacts to industry and modification content discussion, related to the Charging and Connection matters.

Anyone can bring an agenda item (not just the ESO!)

#### **Expectations**

Be respectful of each other's opinions and polite when providing feedback and asking questions

Contribute to the discussion

Language and Conduct to be consistent with the values of equality and diversity

Keep to agreed scope

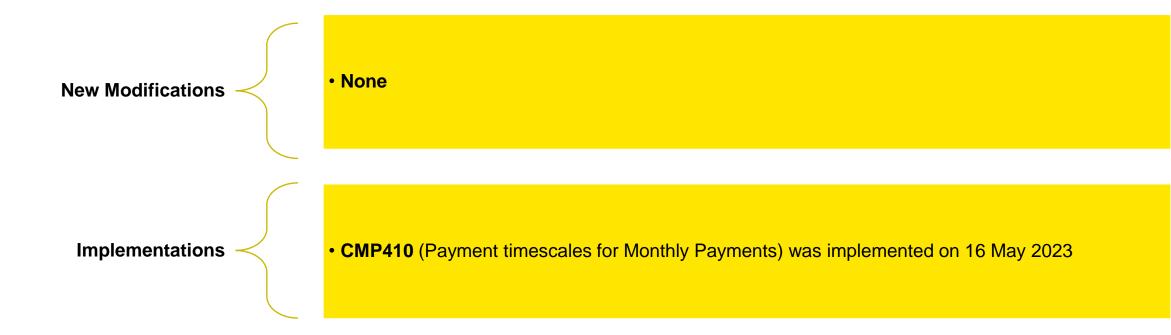
# Review of previous actions

ID	Month	Agenda Item	Description	Owner	Notes	Target Date	Status
23-04	May 23		Provide detailed update on the 10- year forecast	Nick Everitt		June	Open

Code Administrator update

Milly Lewis - Code Administrator ESO

# Key Updates since last TCMF



# Key Updates since last TCMF

• CMP330/CMP374 (Allowing new Transmission Connected parties to build Connection Assets greater than 2km in length & CMP374: Extending contestability for Transmission Connections) and **CMP414** (CMP330/CMP374 Consequential Modification) - Code Administrator Consultations closes 5pm 29 June 2023 **Current Consultations** • CMP398 (GC0156 Cost Recovery mechanism for CUSC Parties) and CMP412 (CMP398 Consequential Charging Modification) - Code Administrator Consultations closes 5pm 09 June 2023 • CMP402 (Introduction of Anticipatory Investment (AI) principles within the User Commitment Arrangements) – Workgroup Consultation closes 5pm 15 June 2023 CMP315/CMP375 (Expansion Constant Review) – Further Workgroup meetings are being scheduled to discuss potential alternates • CMP331 (Option to replace generic Annual Load Factors (ALFs) with site specific ALFs) - Code Administrator Consultation received 3 non confidential responses • CMP376 (Queue Management) – Final Modification Report submitted to Ofgem on 07 June 2023 Other CMP392 (Transparency and legal certainty as to the calculation of TNUoS in conformance with the Limiting Regulation) - Workgroup Consultation received 5 responses • CMP396 (Re-introduction Of BSUoS on Interconnector Lead Parties) - Independent legal advice now published and next steps to be agreed at June 2023 Panel. • CMP408 (Allowing consideration of a different notice period for BSUoS tariff settings) – Workgroup Consultation received 1 confidential and 7 non confidential responses

## **Useful Links**

For updates on all "live" Modifications please visit our "Modification Tracker" here

Ofgem's expected decision date / date they intend to publish an impact assessment or consultation, for code modifications/proposals that are with them for decision is <u>here</u>

For summary of key decisions at latest Panel please click here

For current prioritisation stack please click here

#### CUSC 2023 - Panel dates

CUSC	Panel Dates	Papers Day	Modification Submission Date	(TCMF) CUSC Development Forum
January	27 (Face to Face Meeting)	19	12	5
February	24	16	9	2
March	31	23	16	9
April	28 (Face to Face Meeting)	20	13	6
Мау	26	18	11	4
June	30	22	15	8
July	28 (Face to Face Meeting)	20	13	6
August	25	17	10	3
September	29	21	14	7
October	27 (Face to Face Meeting)	19	12	5
November	24	16	9	2
December	15	7	30/11	23/11

TCMF Sub-group – Enduring Fixed BSUoS verbal update

Alice Taylor - ESO

TNUoS Task Force verbal update

Nicola White - ESO

TNUoS 10yr Forecast

Jo Zhou - ESO

# Update: 10-year TNUoS tariff forecast

#### Objectives

- To give insight on the tariff impact from significant future network development, e.g.
  - Holistic Network Design (HND single, integrated design that supports the large-scale delivery of electricity generated from offshore wind);
  - Accelerating Strategic Transmission Investments (ASTI facilitating the transfer of renewable generation to mainland Scotland)
- To assess how the future scenarios may impact TNUoS tariffs
  - Generation technologies mix
  - Demand trend

# 10-year TNUoS tariff forecast

#### Constraints

- We recognise the uncertainties in the next 10 years, and the constraints we face
  - Energy policies
  - New technologies and challenges
  - Methodology changes
  - Regulatory uncertainties
  - Unavailability of some detailed network data
  - Generation and demand background: scenarios instead of forecast

# 10-year TNUoS tariff forecast

Proposed scope

	In scope	Out of scope
Circuits	ASTI and HND HVDC circuits impacts on wider tariffs (illustrative)	Methodology options for a meshed HVDC network (local or wider, MITS node etc)
Gen cap	Incremental impact on consumers by changes to gen wider locational revenue recovery	Forecasting gen cap figures, or forecasting local charges, or charges associated with pre-existing assets
FES	Changes to wider tariffs due to generation/demand trends under FES scenarios	Sensitivities around categorisation of new generation technologies and the associated ALFs
CUSC	Where possible, align with the existing CUSC methodology	CUSC mods options, SCR options (if not been implemented via CUSC mods), REMA etc

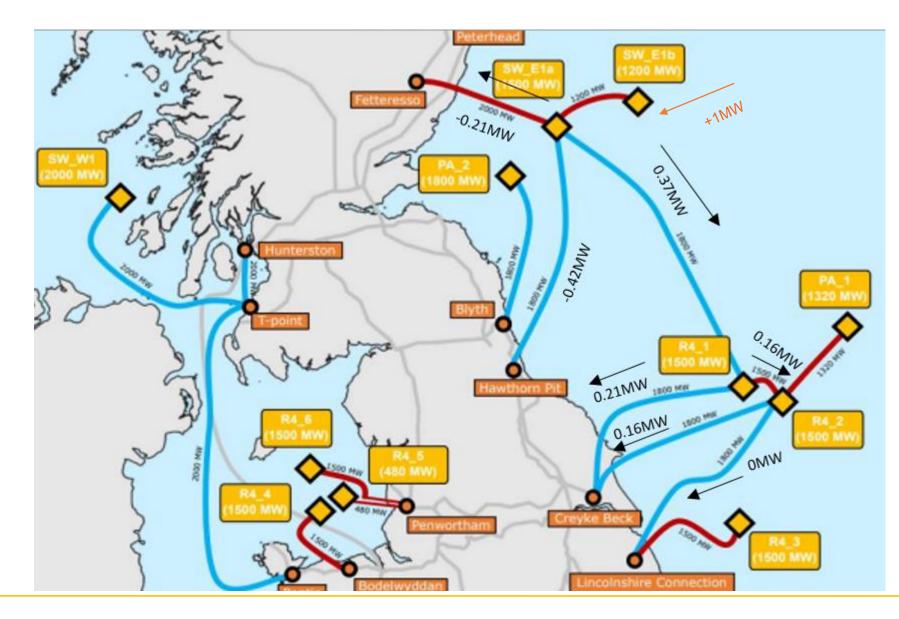
## ESO 10-year TNUoS tariff forecast

Options to combat the HND methodology challenge

- Option 1 treat DC circuits as if they were AC circuits
- Option 2 "even spread" of flows at junction points

 Objective: to keep the tariff calculation relatively simple, and easy to understand, while still retain the locational signals

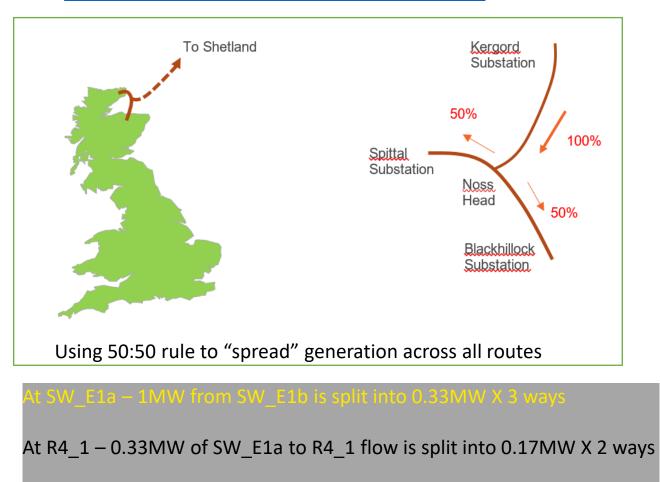
# Option 1 – treat DC circuits as if they were AC circuits



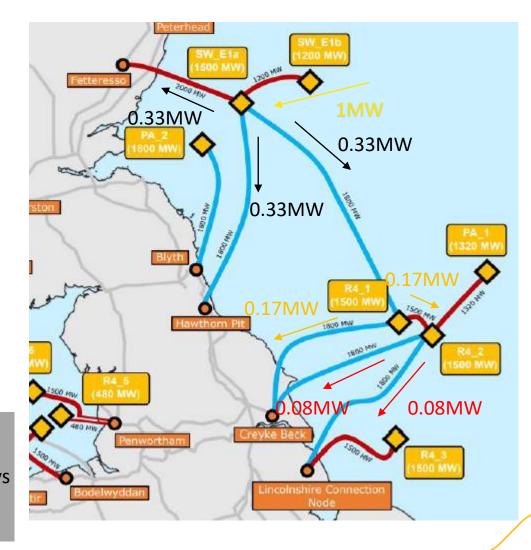
- Indicative flows by +1MW at SW\_E1b
- Results are indicative
- Results change with generation, demand, network topology and parameters

# Option 2 – "Even Spread"

#### https://www.nationalgrideso.com/electricitytransmission/document/189146/download



At R4\_2 – 0.17MW of R4\_1 to R4\_2 flow is split into 0.08MW X 2 ways



Operation of SVCs and TNUoS charges

Giulia Licocci - Ocean Winds

Operation of Static Var Compensators (SVCs) in the NETS and TNUoS Charges

Proposal to refine the allocation of SVC costs at OFTO transfer

08 June 2023



DATE:

#### **Reactive Compensation Compliance**

- Reactive power is crucial for ensuring voltage levels remain within acceptable limits and is required for the reliable and efficient operation of the National Electricity Transmission System (NETS)
- The Grid Code sets out the mandatory reactive compensation requirements for offshore generators and offshore transmission owners (OFTO) :

#### CC.6.3.2(e)(i) - Offshore generator requirement:

- Radially connected offshore windfarms are required to maintain zero reactive transfer at the Offshore Grid Entry Point
- Generators typically use the reactive capability of the WTGs to compensate for the inductance of the inter-array cables and achieve zero reactive transfer at the offshore grid entry point. Shunt reactors/switched reactors are used to compensate for the offshore export cables.

#### CC.6.3.2 (c) - OFTO requirement:

- The OFTO is required to maintain 0.95 power factor lagging and 0.95 power factor leading at the Onshore Interface Point
- This is achieved via the installation of Static Var Compensators (SVC). The absorption or delivery of reactive power from the SVC is continuously adjusted to meet the requirement for reactive power flow
- The requirement for reactive compensation is placed on the OFTO and not the wind farm because it is not efficient to comply with the normal generator dynamic reactive compensation requirements offshore due to the long Offshore Export Cable (OEC) lengths
- In a generator build OFTO exercise (all OFTO transfers to date), the generator bears the cost to comply with both reactive compensation requirements by installing shunt reactors offshore and the SVC onshore

#### **OFTO Transfer and TNUoS charges**

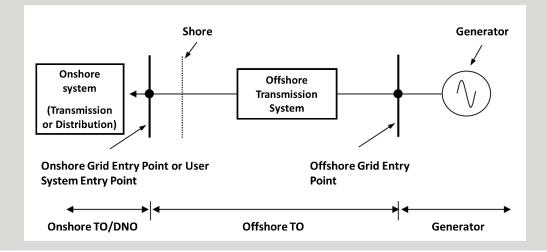
- After the OFTO transaction, the SVC is transferred to the OFTO and paid via the Final Transfer Value (FTV), which forms the basis for the Tender Revenue Stream (TRS)
- NGESO uses the TRS, including the cost of SVCs, to calculate the TNUOS offshore local circuit tariff paid by the generator to the OFTO for the lifetime of the asset
- The cost of the SVC falls into the local circuit tariff, and is ultimately born by the generator after OFTO transfer
- The cost allocation of SVCs is neither codified nor specifically mentioned in the CUSC document, and implementation of costs is an interpretation applied by NGESO

Cost allocation	Tariff	Asset/Cost category
		Cable
o	Circuit	Cable Assets
Offshore Generator	Tariff	Reactive Equipment
ene	Talli	Harmonic Filtering Equipment
Ŭ		HVDC Converter Station
IOLE		Transform er Assets
fsh	Substation	Switchgear Assets
0	Tariff	Platform
		Auxillary Supply Equipment
Socialised	Onshore tariff	Onshore Substation

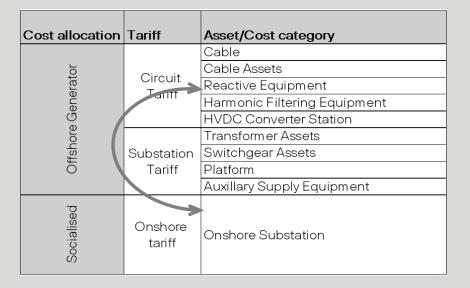


#### Defect

- After the OFTO transaction, an offshore wind farm's point of connection (POC) is offshore, and the SVC is not used for compliance at this POC
- Consequently, the generator pays, via the TNUoS offshore local circuit tariff, for an asset located within the onshore transmission system that is used for OFTO reactive compensation compliance rather than wind farm compliance
- The SVCs are not used for offshore export cable compensation. Therefore, while it is intuitive that the shunt reactor costs fall into the local circuit tariff, it should not follow that SVCs are treated in the same way
- The SVCs provide valuable reactive compensation services to the grid and wider users. However, under current arrangement generators bears 100% of the costs whilst the value of this benefit does not flow back to the generator



#### **Proposed solution**



- The status quo fails to meet the CUSC charging objective (b) of charges accurately reflecting the costs incurred by transmission licensees
- This highlights the necessity for a fairer approach that is more consistent with CUSC objectives
- The proposal is to amend the calculation of TNUoS by allocating the cost of SVCs to the socialised onshore tariff
- OW will raise a CUSC modification and will seek approval from the CUSC Panel in June 2023

GB Connections Reforms verbal update

Michael Oxenham and Laura Henry - ESO

VAT Treatment of Embedded Export Tariff

Nick George - ESO

# What is Embedded Export Tariff (EET)?



\*AGIC = Avoided GSP (Grid Supply Point) Infrastructure Credit, which is indexed by average May to October CPIH each year.

- Paid to HH demand customers and embedded generators (<100MW) based on the HH metered export volume during the triads
- Embedded Generation (<100MW) which contracts directly with National Grid ESO can gain Embedded Export payments
- Forecast at £19.4m in FY23/24 (compared to total TNUoS revenue of £4.4bn). This is added to the revenue to be recovered from the demand residual, to ensure overall revenue recovery is correct.

# Current Invoicing Embedded Export Tariff – Backing Sheets

- For suppliers, EET is included within TNUoS monthly settlement.
- The EET credit is calculated, and then netted against the HH liability.
- The total of EET + HH is floored at zero during monthly billing (ie never negative), and is reconciled through future month's invoices and then the demand reconciliation where it is allowed to be negative.

1	Α	В	C	D	E	F	G	Н	1	J	K	L	M	N	0
1	AAA	TNUDBS01	D	2.02302E+13	SO	NG	BP	ABCE	1	OPER					
2	SCHDR	BackingDetails													
3	BSHD1	Backing Informa	tion for N	Ionthly TNUo	S Demand Charge	S									
4	BSHD2	May-23													
5	CNAME	ABC ENERGY													
6	INVNO	15384144	BackingDetails Backing Information for Monthly TN May-23 ABC ENERGY 15384144 MSM_TNUOS_461538414458 L5.05.2023												
7	BLREF	MSM_TNUoS_46	15384144	58											
8	DUEDT	15.05.2023													
9	BSPDT	01.05.2023													
10	BLANK														
											Forecast			Forecast	ForecastAn
					LatestForecastH		ForecastAn	LatestForecast		Forecast	AnnualH	latestForec		AnnualN	nualHH+EE+
					HTriadDemand(	HHDemandTar	nualHHLiab	EmbeddedExp	EETariff(£/	AnnualEE	H+EELiabi	stNHHEner	NHHTarif	HHLiabili	NHHLiabilit
11	SCDT1	BMUnitID	ZoneID	ZoneName	kW)	iff(£/kW)	ility£	ort(kW)	kW)	Liability£	lity£	y(kWh)	f(p/kWh)	ty£	у£
12	BSDT1	2ABCEN000	9	EASTERN	800	100	80000	150	11	-1650	78350	500	16	80	78430
13	BLANK														

 For Embedded Generation (<100MW) which contracts directly with National Grid ESO, paid through initial demand reconciliation.

## Current Invoicing Embedded Export Tariff – Invoices

- On the TNUoS demand invoice, the total of HH + EET is currently on a single line.
- Standard VAT is applied on the total (net) HH + EET amount

											natio
	A	В	С	D	E	F	G	Н	1	J	nanc
1	AAA	TNUDIN01	D	2.02E+13	SO	NG	BP	TNUOSRE	1	OPER	
2	SCHDR	InvoiceDetails									
3	INHD1	THIS IS NOT A VAT INVOICE									
4	INHD2	TNUoS Charges									
5	BLANK										
6	SCTTL	Туре	Company	Account	InvoiceNu	InvoiceDa	YourOrde	OurBilling	Reference	e	
7	INTTL	SALESINVOICE	ABC ENER	1926789	7.69E+08	01.05.202	TNUoS M	MSM_TNU	oS_93576	2049320	
8	BLANK										
9	SCDET	Description	ValueExcl	VATAmou	int						
10	DINV1	Infrastructure Demand - HH	100	20							
11	DINV1	Infrastructure Demand - NHH	50.52	10.1							
12	DINV1	Infrastructure Demand - TDR	1000000	200000							
13	BLANK										
14	SCTOT	TotalExclVAT	TotalVATA	TotalIncV	AT						
15	INTOT	1000150.52	200030.1	1200181							
16	BLANK										
17	SCFTR	PaymentDueDate									Infrast
18	INFTR	15.05.2023									Standa
19	ZZZ	19									Our Jo

#### national**gridESO**

# Your account number SALES INVOICE Document number 1135/ Document number 1135/ (Please quote in all enquiries) Date 30.06.2022 Your Order Ref.

THIS IS A VAT INVOICE

Please see final page for enquiry information

		iqui j in onnacion
Description	Value	VAT Amount
Infrastructure Demand - HH Rec		
Standard rated VAT: 20%		
Our Job Ref: TNUoS Init Rec 2021-22		

# Change to VAT on EET

- HMRC have been in discussion with ESO around VAT treatment of EET
- HMRC have determined that EET should be outside the scope of VAT, being a "pass-through" payment
- Changes are now being made to our new STAR billing system to enable the change:
  - Invoice PDF and Invoice CSV will need changing to break out EET onto separate line, to which zero VAT will be applied
  - No change to CSV backing sheet required
- Change planned for October 2023 TNUoS billing
- Updated CSV file specification and samples be provided in advance (around August)
- This change will also be raised in the Electricity Industry Tax Group.

Improvement to TDR Invoice Supporting Information

Nick George - ESO

## **Overview of Proposed Change**

- TDR changes went live 1 April 2023, introducing a new TNUoS site daily charge for final demand sites
- TNUoS Demand is being billed from our new STAR system
- CSV Backing sheet provides a breakdown of site count by TDR band
- Some customers have asked for more detail, to allow them to verify the site counts and query any discrepancies with the DNOs
- ESO only receive site count numbers by band for each DNO, we do not receive individual site details. For any queries, suppliers need to contact the DNOs.
- To help customers, we are looking to add more detail on backing sheets, to also give the breakdown of site count by DNO and meter registrant (as well as band).
- A draft mock-up of the change to the report is shown on next slides. We are working up the detail and in late June will publish a formal update to the data definition document and CSV template on our website.
- Change could potentially go live for August billing (invoices issued 1 August), but we aimed to give 2 months
  notice to changes in report templates, which would mean September billing. Views welcome.
- Other minor change is that intermediate values / subtotals (£) will be quoted to 6dp.

# **TNUoS Demand Backing Sheet - Current**

	Α	В	C	D	E	F	G	Н		J	K	L	M	N	0
1	AAA	TNUDBS0	D	2.02E+13	SO	NG	BP	ABC	1	OPER					
2	SCHDR	BackingD	etails												
3	BSHD1	Backing I	nformation for Monthly	y TNUoS Demand	Charges										
4	BSHD2	JUNE 2023	}												
5	CNAME	ABC ENER	GY												
6	INVNO	4.96E+09													
7	BLREF	MSM_TNU	JoS_694960888382												
8	DUEDT	15.06.202	3												
9	BSPDT	01.06.202	3												
10	BLANK														
	SCTND	BMUnitl	ZoneID	ZoneName	LatestForecas	HHDema	ForecastA	LatestForecast	EETariff(	ForecastAn	ForecastAnnu	LatestForec	NHHTarif	ForecastAnnu	ForecastAnn
		D						EmbeddedExp			alHH+EELiabili	astNHHEner	f(p/kWh)	aINHHLiabilit	ualHH+EE+N
11					and(kW)	£/kW)	iability£	ort(kW)		lity£	ty£	gy(kWh)		y£	HHLiability£
12	BSTND	2ABCN9	1	NORTHERN SCOT	12	40.44666	80.893324	1	1.2	-1.2	79.693324	3.01	2	0.0602	79.753524
13	BLANK														
	SCTDR	Charging	AnnualSiteCountDays	TDRTariff(£/Site	AnnuaITDRLi										
		Band	(SCD)orAnnualUMSCo	/Day)orUMSTari	ability£										
14			nsumption(MWh)	ff(p/kWh)											
15	BSTDR	DOM	890	0.20577	183.135300										
16	BSTDR	EHV1	14	45.6789	639.504600										
17	BSTDR	EHV2	0	620.891585	0.000000										
18	BSTDR	EHV3	0	1313.056936	0.000000										
19	BSTDR	EHV4	1	3395.928127	3395.928127										
20	BSTDR	HV1	108	10	1080.000000										
21	BSTDR	HV2	0	56.583289	0.000000										
22	BSTDR	HV3	0	99.778507	0.000000										
23	BSTDR	HV4	0	257.063453	0.000000										
24	BSTDR	LV1	31	4.43	137.330000										
25	BSTDR	LV2	5	5.727161	28.635805										
26	BSTDR	LV3	1	9.304445	9.304445										
27	BSTDR	LV4	0	21.137144	0.000000										
28	BSTDR	LVN1	4271	0.043343	185.117953										
29	BSTDR	LVN2	7343	10.245167	75230.261281										
30	BSTDR	LVN3	824	0.604727	498.295048										
31	BSTDR	LVN4	9481	1.910747	18115.792307										
32	BSTDR	TRN1	0	389.027378	0.000000										
33	BSTDR	TRN2	0	11392.24206	0.000000										
34	BSTDR	TRN3	0	38.360041	0.000000										
35	BSTDR	TRN4	0	8897.950662	0.000000										
36	BSTDR	UMS	1.364	1.003187	13.683471										
37	BLANK														

## TNUoS Demand Backing Sheet – <u>DRAFT</u> Mock-Up of New Table

41 SCDSO	DNO	<b>Registrant ID</b>	DOM	EHV1	EHV2	EHV3	EHV4	HV1	HV2	HV3	HV4	LV1	LV2	LV3	LV4	LVN1	LVN2	LVN3	LVN4	UMS
42 RICBS	EELC	REGA	1	0	0	0	0	99	0	0	0	0	0	0	0	256	209	55	11	0
43 RICBS	EELC	REGB	1	0	0	0	0	0	0	0	0	0	0	0	0	0	123	55	2346	0
44 RICBS	EELC	REGC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
45 RICBS	EELC	REGD	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
46 RICBS	EMEB	REGA	1	0	0	0	0	0	0	0	0	0	0	0	0	88	196	41	15	0
47 RICBS	EMEB	REGB	55	0	0	0	0	0	0	0	0	0	0	0	0	1	123	44	1743	0
48 RICBS	EMEB	REGC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
49 RICBS	EMEB	REGD	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
50 RICBS	ETCL	REGA	1	0	0	0	0	0	0	0	0	1	2	1	0	8	12	19	1	0
51 RICBS	ETCL	REGB	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
52 RICBS	ETCL	REGC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
53 RICBS	ETCL	REGD	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
54 RICBS	FEAL	REGA	7	0	0	0	0	0	0	0	0	0	0	0	0	96	0	0	0	0.88
55 RICBS	FEAL	REGB	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
56 RICBS	FEAL	REGC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57 RICBS	FEAL	REGD	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
58 RICBS	FORB	REGA	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
59 RICBS	FORB	REGB	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
60 RICBS	FORB	REGC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
61 RICBS	FORB	REGD	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**Securities for Connections** 

Extending principles of CUSC section 15 User Commitment Methodology to all Users

Alison Price - ESO

#### Background

- User commitment arrangements are rules by which Users of the transmission system must underwrite works they trigger on the transmission system
- Users must financially secure the network reinforcement and investment needed to connect them
- They represent a financial commitment which falls away and is replaced with Use of System charges once a User is connected
- In the event a User terminates it's connection agreement prior to connection, the User must pay a cancellation charge to the ESO which then flows through to the relevant TO(s).
- There are two security methodologies currently in use in relation to the use of new, additional or reduced capacity:

#### 1. CUSC Section 15 User Commitment Methodology

Under Section 15 methodology, the User is required to place security with ESO to cover their proportion of the liability which reduces as the project passes milestones.

#### 2. Final Sums methodology

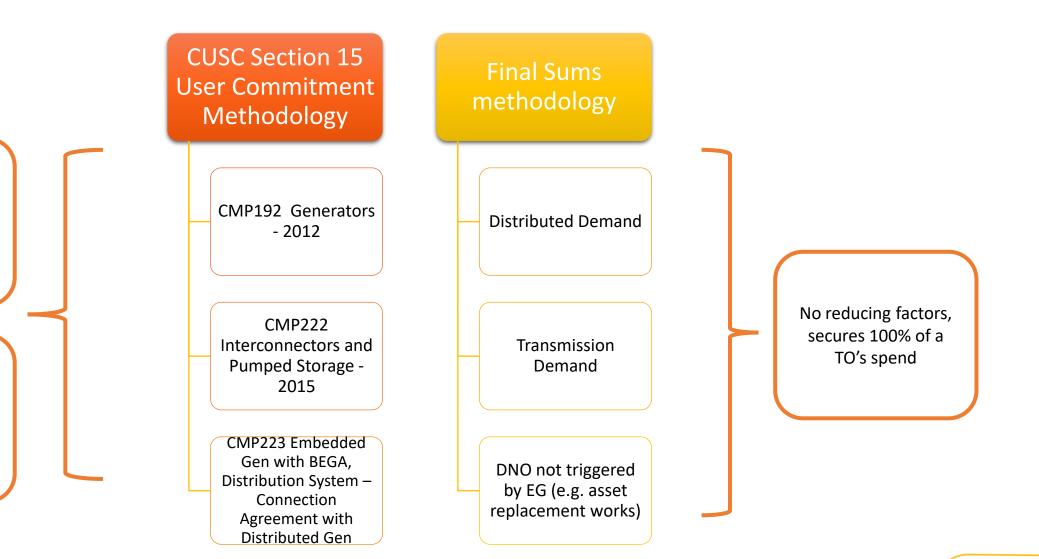
this means that they're financially liable for the total of the Transmission Owners (TO) spend until the works have been completed.

Under Final Sums methodology, the ESO maybe over-securing a User's liability where there is shared works or assets which could be reused if a project is cancelled.

#### Background

Covers a proportion of liability; reducing rate as project passes set milestones and nears completion

CMP192, and subsequent mods CMP222 and CMP223 worked to lower perceived barriers to new entrants and incentivise timely communication of termination.



#### Why change?

- An increase in Demand connections over recent months and years has driven transmission works beyond the connection site
- Final Sums methodology is acting as a barrier to entry for some Users; will help remove uncertainty for developers in terms of the levels of a TO's spend they need to secure against
- Extending CUSC Section 15 to all remaining Users, ensures a level playing field across all Users groups
- Ensures fairer competition across Users if their security levels more accurately reflects the transmission liabilities a User imposes should they cancel or reduce capacity
- Helps ensure that the ESO is not over-securing a User's liability where there is shared works or assets can be reused

#### **Solution**

- Extend Section 15 of CUSC to all User groups introducing equitable treatment between Users to accurately reflect the transmission liabilities they impose
- Possible creation of a "capacity figure" for the new Users in CUSC section 15 only as Cancellation Charge within this section is payable by Users on terminations of agreements or reductions in a capacity product

- Consideration by WG as to whether a change is needed to ESO's Electricity Transmission licence, Special Conditions

- Any solution will likely require a transitional period to facilitate change in contractual positions, in particular the construction agreement; changes to internal Connections processes and the Connections internal Securities Database to include remaining Users in "User Commitment Methodology"
- Implementation will need to be aligned to the Cancellation Charge statements process, which runs every January and July

# AOB & Close

**ESO**