

TNUoS Task Force

Meeting 5

26th April 2023





10:00 - 11:45

- > 10:00 Introduction & Welcome
- > 10:05 Ways of Working & Expectations
- > 10:15 Ofgem Update
- > 10:25 Progress to Date
- > 10:45 Analytical Support
- > 11:45 Break

12:00 - 13:00

- > 12:00 Feedback & Further Discussion
- > 12:30 Forward Looking Plan
- > 12:50 Next Steps & Close

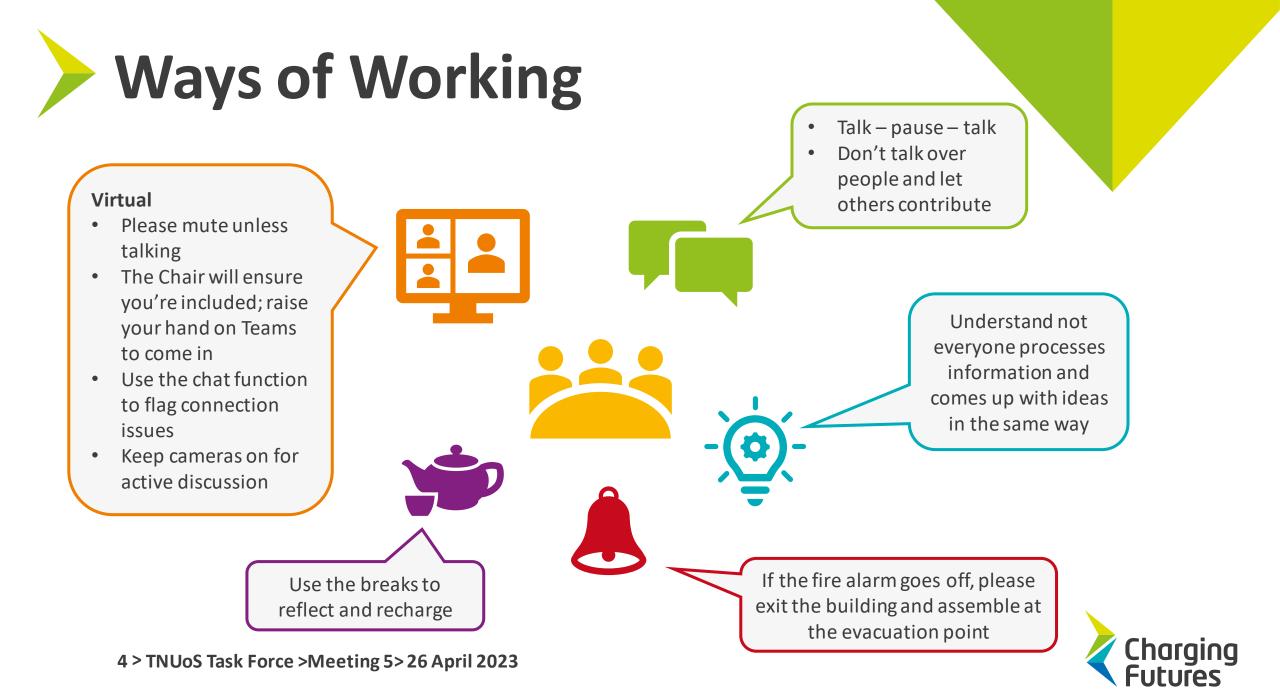


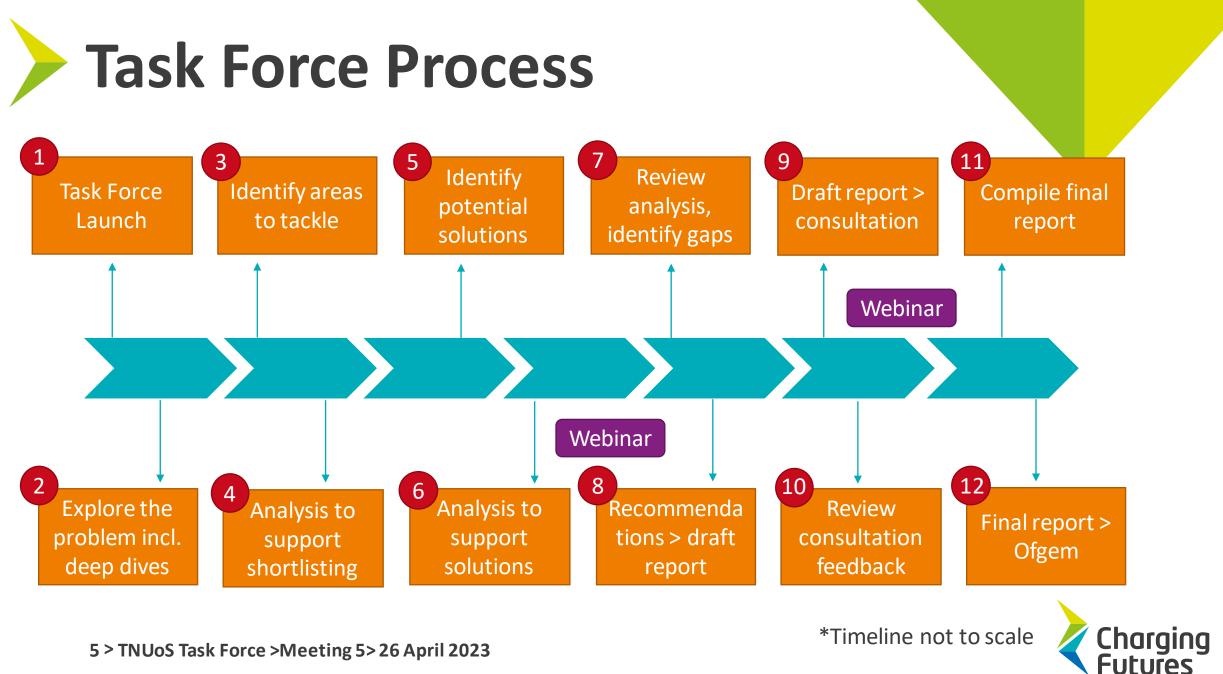
Ways of Working & Expectations

Jon Wisdom

The objective of this session is to recap on:

- General Ways of Working (WoW)
- How the Task Force process should work
- Expectations of TF members i.e. wider engagement etc





5 > TNUoS Task Force > Meeting 5 > 26 April 2023

*Timeline not to scale



What are the different routes of engagement?



Ofgem Update

Harriet Harmon

7 > TNUoS Task Force >Meeting 5> 26 April 2023

Progress to Date

James Stone

The objective of this session is to provide:

- Summary of discussions/achievements so far
- High-level overview of the work undertaken during the pause
- Highlights of key external developments since Task Force meetings ceased

Achievements

Since Task Force Launch, members have:

- 1. Identified industry engagement opportunities and agreed expectations of members
- 2. Explored and defined the problem statement and agreed scope of work
- 3. Discussed background and rationale for previous methodology changes
- 4. Clarified the definition of TNUoS (what it was designed to reflect)
- 5. Agreed the underlying principles of TNUoS and what it should aim to achieve (objectives)
- 6. Identified and prioritised areas for review or specific defects within current charging arrangements



Building on the work of the Task Force

During the hiatus in Task Force meetings, the ESO have:

- 1. Further reviewed the defects identified by the Task Force taking account of what work could feasibly be undertaken during the pause
- 2. Engaged with wider industry in terms of areas of review and work packages the ESO intended to take forward and assess
- 3. Received approval for Network Innovation Allowance (NIA) funding for consultancy support with subsequent onboarding
- 4. Refined and agreed (jointly with Ofgem) the scope of the analytical assessment and key deliverables of the project
- 5. Managed the project through the analytical phase with the output to then be taken back to the Task Force to support further discussion



Industry Developments

There have been some recent, notable developments that interact with the Task Force scope of work:

- 1. **CMP413**: 'Rolling 10-year wider TNUoS generation tariffs' looks to aid predictability by obligating the ESO to publish and fix (within a permitted range) generation tariffs for a rolling 10-year duration
- 2. Offshore Charging Sub-Group: established in Feb 23 with the aim of providing input and developing charging methodology changes to support the ESO in creating a set of modifications to facilitate the HND/offshore coordination.
- **3. CMP405: '**TNUoS Locational Demand Signals for Storage' seeks to separate out the demand 'Year Round' locational signals from 'Peak Security' locational Signals and charge (reward) Storage which imports during times other than Triads, i.e. When Wind Generation is fully operating.



Analytical Support

Frontier & LCP

The objective of this session is to provide:

 A high-level overview of the assessments undertaken so far, including; approach to the review, issues identified, initial analysis and conclusions, and potential solutions.



TNUoS Taskforce analytical support



Meeting with TNUoS Task Force

26th April 2023



Agenda

#	Торіс	Page
1	Scope of our review	3
2	Backgrounds	6
3	Shared/Not-Shared elements	12
4	Data inputs	17
5	Reference Node	20



Agenda

Торіс	Page
Scope of our review	3
Backgrounds	6
Shared/Not-Shared elements	12
Data inputs	17
Reference Node	20
	Scope of our review Backgrounds Shared/Not-Shared elements Data inputs



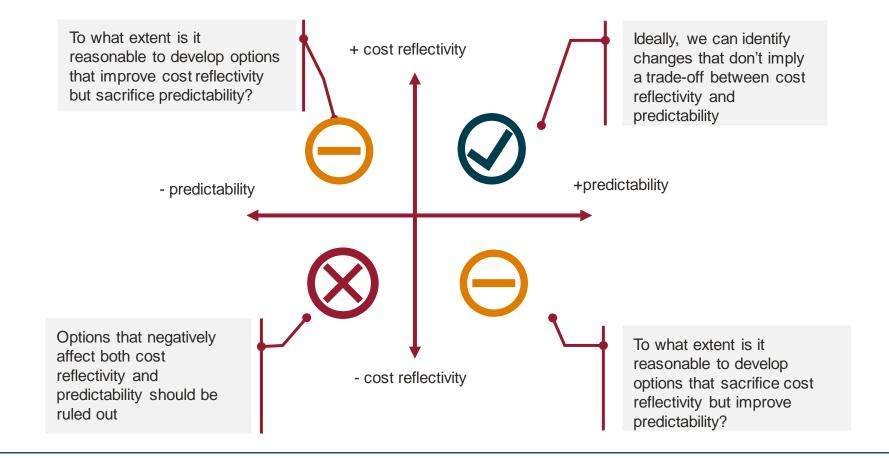
Our review considers four areas identified by the ESO based on the earlier work from the Taskforce

Backgrounds	 Review appropriateness of current backgrounds.
Shared/not shared elements	 Review of the shared/not shared elements of the Wider tariff and whether they continue to be based on appropriate, cost-reflective assumptions.
Review data inputs	 Assess potential improvements of issues with the data inputs identified by ESO.
Reference node	 Describe the original rationale of the current reference node and test the impact of moving to a generation weighted reference node.



A key focus of this work consists of identifying improvements to cost reflectivity while also improving predictability for investors

While we will seek to identify options that improve cost reflectivity while also improving predictability, it may be that many options will imply a tradeoff between the two, that we will need to understand.



frontier economics



Agenda

#	Торіс	Page
1	Scope of our review	3
2	Backgrounds	6
3	Shared/Not-Shared elements	12
4	Data inputs	17
5	Reference Node	20



Our analysis suggests that updates to the current backgrounds could be appropriate

We first consider cost reflectivity...

- We assess the extent to which current backgrounds are representative of maximum network flows, and...
- ...consider possible alternative backgrounds that are more closely aligned with maximum network flows.
- We consider the implications of this analysis for whether to apply a single background, two backgrounds (i.e. current approach), or additional backgrounds.
- The analysis suggests that Year Round and Peak Security type backgrounds are likely to remain relevant, though their representativeness can be improved with changes to specific assumptions
- If a single background was favoured, a Year Round type scenario could be most appropriate going forward, although this would entail a small reduction in cost reflectivity, relative to two backgrounds. As an example, charges would be expected to increase for wind as circuits previously tagged to Peak Security are now tagged as Year Round.
- The marginal benefit of adding a third background is much reduced compared to adding a second background

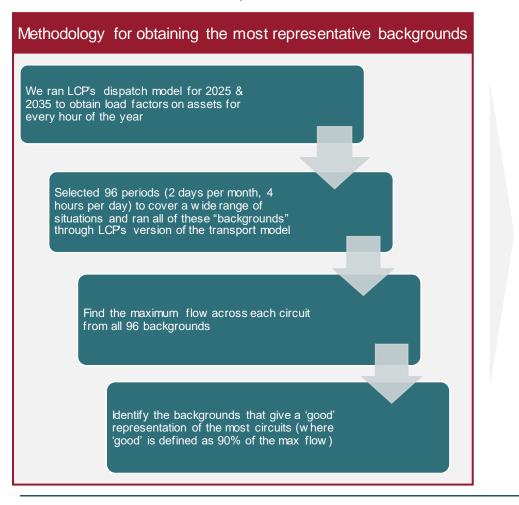
... and then predictability

- We assess the implications for tariff volatility of applying two backgrounds or a single background.
- Specifically, we compare the evolution of tariffs over the last five years when using two backgrounds against:
 - a Peak only; and
 - a Year-Round scenario.
- However, the predictability analysis suggests that there are no clear implications for year to year volatility from applying one (Year Round) or two backgrounds, which may suggest no material change in predictability of the tariffs.
- Although moving to a single background would remove one area of uncertainty in the tariff calculations (i.e. the tagging of circuits to a particular background).
- There appear to be volatility implications if adopting only a peak background, however, this would be inconsistent with the cost reflectivity analysis.



A Peak and Year Round type backgrounds are important but their representation Cost reflectivity can be improved with changes to the assumed generation mix

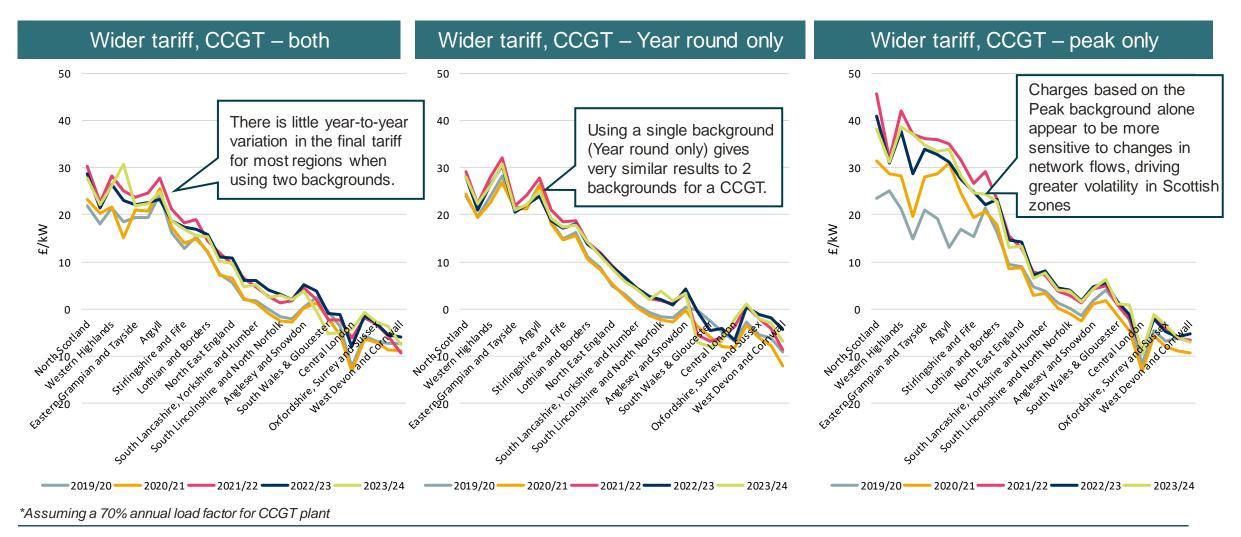
In this analysis we assess the extent to which the current backgrounds are likely to represent the true cost driver (max flow) on each network element, and the extent to which alternatives may be more cost reflective



	Current backgrounds			Most representative backgrounds			ounds
		2025		2025		2035	
Technology	Peak	Year-round	Combined	Round 1	Round 2	Round 1	Round 2
Embedded gen	-	-		13%	13%	-15%	6%
Biomass	88%	27%		68%	68%	99%	100%
OCGT	88%	0%		0%	77%	0%	40%
CCGT	88%	27%		21%	95%	0%	94%
Hydro	88%	27%		64%	64%	52%	64%
Interconnectors	0%	100%		48%	59%	-93%	90%
Nuclear	88%	85%		100%	100%	100%	100%
Wind Offshore	0%	70%		87%	4%	71%	30%
Wind Onshore	0%	70%		81%	4%	62%	2%
Pump Storage	88%	50%		0%	58%	0%	0%
Demand	52,417	52,417		50,547	50,770	61,552	72,121
% represented	32%	33%	43%	59%	67%	72%	84%
Current Peak and YR scenarios do not provide a very good representation for over half of the network.				1	lar to R	Similar Peak	



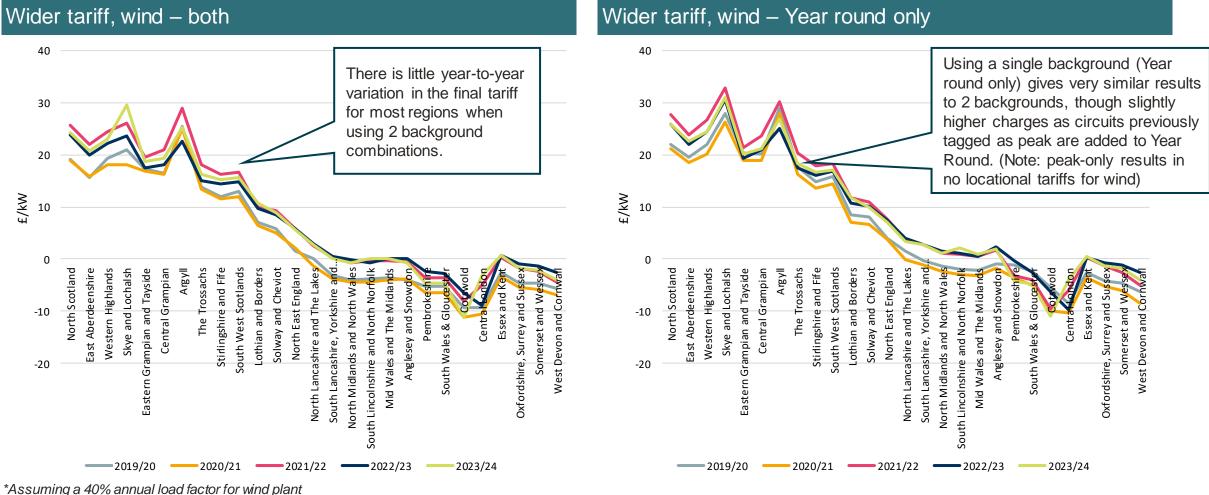
For a CCGT plant, volatility of charges only appears to be materially affected if applying a single peak scenario...



frontier economics

Predictability

...for wind, we find limited impact on volatility from applying a single Predictability background, although there is an implication for the level of charges



LCP

The five most representative backgrounds in 2025 and 2035

2025

Technology	Round 1	Round 2	Round 3	Round 4	Round 5
Year	2025	2025	2025	2025	2025
Month	1	2	9	9	12
Day	8	8	23	23	8
Hour	18	18	4	7	18
Embedded gen	13%	13%	5%	12%	11%
Biomass	68%	68%	3%	3%	68%
OCGT	0%	77%	0%	0%	0%
CCGT	21%	95%	0%	0%	83%
Hydro	64%	64%	0%	57%	64%
Interconnectors	48%	59%	-80%	0%	65%
Nuclear	100%	100%	100%	100%	100%
Wind Offshore	87%	4%	87%	88%	44%
Wind Onshore	81%	4%	77%	86%	9%
Pump Storage	0%	58%	-61%	-35%	0%

Demand	50,547	50,770	26,508	39,370	49,612
% represented	59%	67%	76%	83%	84%

2035

Technology	Round 1	Round 2	Round 3	Round 4	Round 5
Year	2035	2035	2035	2035	2035
Month	3	2	1	1	1
Day	8	8	8	23	8
Hour	18	18	13	7	18
Embedded gen	-15%	6%	-8%	15%	14%
Biomass	99%	100%	99%	99%	99%
OCGT	0%	40%	0%	1%	0%
CCGT	0%	94%	0%	90%	0%
Hydro	52%	64%	59%	41%	64%
Interconnectors	-93%	90%	-81%	81%	-12%
Nuclear	100%	100%	100%	100%	100%
Wind Offshore	71%	30%	75%	6%	45%
Wind Onshore	62%	2%	20%	18%	36%
Pump Storage	0%	0%	0%	100%	100%
Demand	61,552	72,121	56,608	58,690	62,075

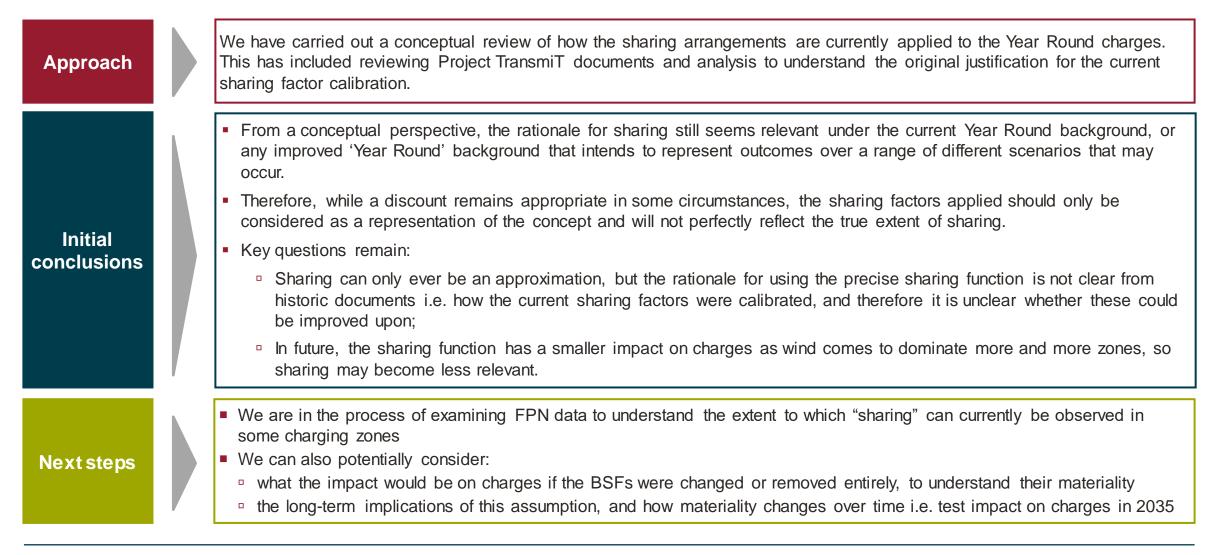
% represented	72%	84%	88%	89%	90%

Agenda

#	Торіс	Page
1	Scope of our review	3
2	Backgrounds	6
3	Shared/Not-Shared elements	12
4	Data inputs	17
5	Reference Node	20



Summary of approach and initial conclusions





The current arrangements provide a discount on charges based on the ability of different generators to share transmission capacity

The Year Round tariff is split into two elements: 'shared' and 'non-shared' based on a generators' ability to 'share' transmission capacity

- Conceptually, the ability of generators to 'share' transmission capacity is determined by the extent to which, prior to any redispatch actions by ESO, output by generators within a zone is positively or negatively correlated. For example: Wind plants are likely to be generating at the same time (i.e. when the wind blows) in a given location and so cannot share transmission capacity by utilising it at different times.
- The current methodology seeks to reflect this by providing a discount on the Year Round element of network charges based on the ability
 of generation assets within a zone to "share" transmission capacity
- The level of discount is determined by Boundary Sharing Factors which are a function of the share of low marginal cost capacity in a zone.

Calculation of Boundary Sharing Factors Classification of generation technologies 110 If the proportion of low carbon Carbon Low Carbon 100 generation in a zone exceeds 50%, 'Carbon' vs 'low carbon' 90 then part of the Year Round tariff Coal Wind emental Costs (%) classification is really 80 will be classed as 'non-shared' about zero/low marginal Hydro (ex. PS) Gas 70 cost vs positive marginal 60 The proportion of the Year cost. Hence biomass is Nuclear Biomass 50 Round tariff that is nonclassified as carbon Г Oil Marine 40 shared will increase as the Shared 30 Solar is not included in percentage of low carbon **Pumped Storage** Tidal the technology list in the 20 generation increases CUSC, but we assume it 10 Interconnectors would be categorised as 0 low carbon 0 0.1 0.2 0.3 0.9 Proportion of Low Carbon Generation Capacity in a Zone



The rationale for sharing is derived from the fact that an approach based on a limited set of backgrounds is a simplification of reality...

The key overarching aim is to develop charges based on peak flows

This is intrinsically linked to the use of the different backgrounds, and the extent to which these are representative of the full range/distribution of possible generation patterns that may occur

- In theory, N number of backgrounds could be applied to fully represent the range of scenarios in which maximum flows are achieved for each network element i.e. in the extreme a different background could be derived for each network element.
- In this example, charges could be derived as follows:
 - Incremental generation is added to each node against each background to estimate the MWkms triggered.
 - Incremental costs (MWkm*ExpC) would then be paid by generators according to their likelihood of generating in each background i.e. generator pays incremental cost at their node, multiplied by the load factor for the relevant background.

This approach would have a number of advantages, in particular:

- There is no need to apply ALF in calculating charges, since load factors are specific to all scenarios in which plants generate
- There is no need to apply sharing factors, since the impact of a high concentration of low carbon generation would be reflected in the particular scenarios represented by each of the backgrounds for each network element

However, in practice this is not feasible / practical since:

- This is a forward-looking exercise and therefore subject to significant uncertainty
- Practicality / time intensity of applying specific charges across a large number of backgrounds / scenarios

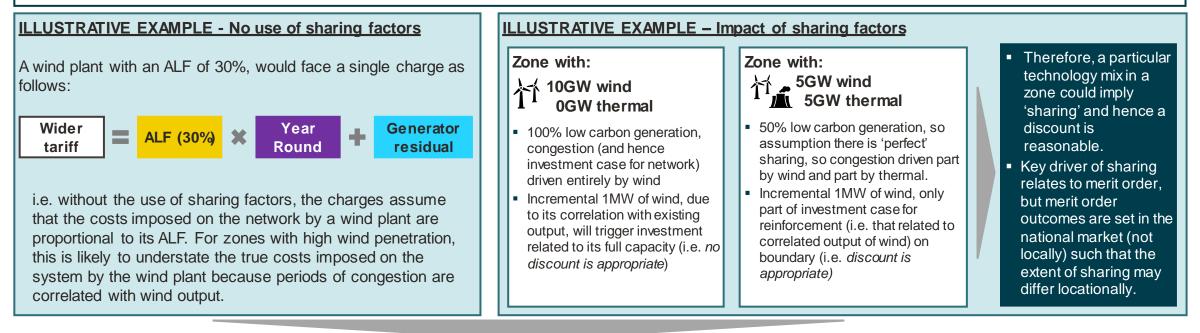


...and in this context there is a logic supporting its inclusion

The current Year Round background is intended to represent a wide range of possible scenarios which have different technology mixes, patterns of generation, load factors etc. It is only in this context that the sharing factors and discount (ALF) are potentially appropriate, and are intended to enhance how reflective the Year Round scenario is of a much broader set of scenarios

Under this approach:

- The charge is multiplied by ALF, as a simple proxy for the effect that a specific plant has on constraint costs and hence network investment.
- Sharing factors are used to calibrate when a discount based on ALF is appropriate.



While sharing is not a perfect approach, there is a logic supporting its inclusion in the methodology.



Agenda

#	Торіс	Page
1	Scope of our review	3
2	Backgrounds	6
3	Shared/Not-Shared elements	12
4	Data inputs	17
5	Reference Node	20

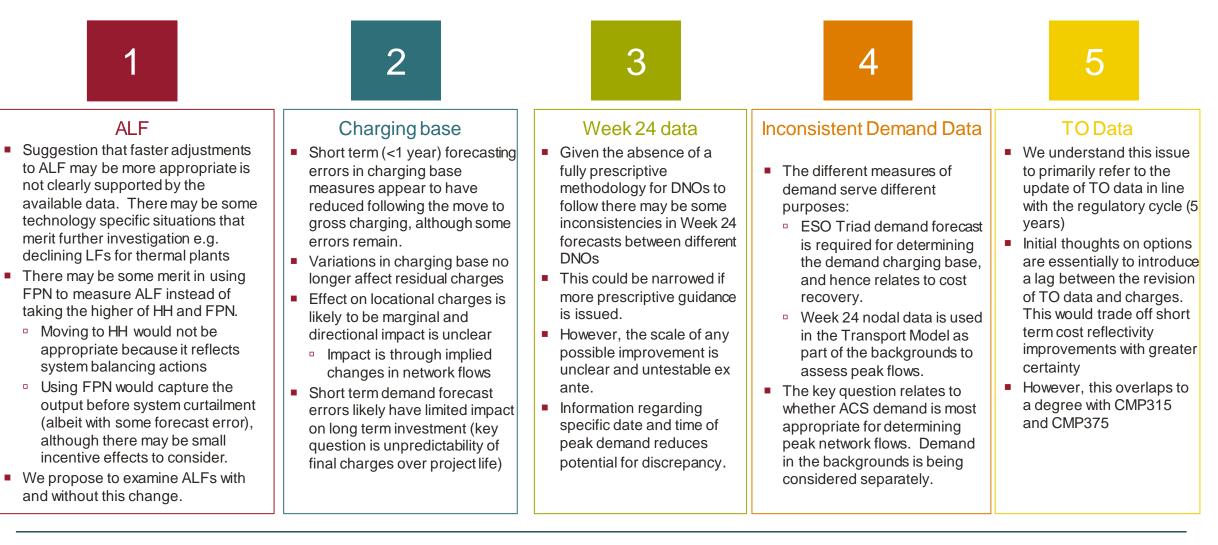


ESO has identified some potential concerns regarding the implications of certain data inputs for charge volatility and predictability

1 ALFs	ALFs are calculated as a rolling 5 year average and so significant changes in the values are smoothed over time creating some stability year to year. However, in the context of rapidly changing load factors (due to technological advancements etc) it is considered that ALFs may need to be reviewed in terms of both the appropriateness of the calculation [i.e. ALF = max (HH, PFN)], as well as the 5-year frequency.
2 Charging bases	The ESO demand charging base forecast process aims to ensure accurate recovery of revenue with the charging base forecast continually refined until final tariffs are published (each January). Considerable movements to charging bases have been witnessed in recent years with industry suggesting this element should be "locked down" in advance. There may be merit in reviewing the ESO processes and this option to lock down the forecast at an earlier stage.
3 Week-24 data	All DNOs provide their "best view" of the likely nodal demand in the Week 24 forecast, however, the practice may not be consistent across the 14 regions and or DNOs. In addition, the forecast provided by the DNOs is based on net demand (not gross demand) which is inconsistent with SQSS. There could be alternatives to the DNO data to consider, for example use of network planning data such as the Electricity Ten Year Statement (ETYS) or the ESO Future Energy Scenarios (FES) which does not rely on DNO 'forecasts'.
4 Demand forecasts	There are inconsistencies between the method of forecast on demand charging bases (by zones and associated demand assumptions), and the DNO's forecast of nodal demand that are used to set locational tariffs which may cause issues. The charging base forecast is based on a Monte-Carlo model, while the Week 24 data are provided by DNOs – with the former focussing on revenue recovery, while the latter focuses on transparency.
5 TO data	 The locational tariffs are dependent on a set of parameters which are reviewed every 5 years by Ofgem (during the RIIO Price Control period) – this refresh can cause some considerable near-term change to the tariffs between price control periods and volatility in TNUoS. In addition, there are some project-specific items that the ESO are not able to publish (e.g. cost of HVDC links) which reduces transparency to industry. (We note that these items are related to expansion factors and CMP 315/375 are dealing with this issue)



Beyond a potential change to the ALF calculation, we have not identified a strong case for change among the remaining issues





Agenda

#	Торіс	Page
1	Scope of our review	3
2	Backgrounds	6
3	Shared/Not-Shared elements	12
4	Data inputs	17
5	Reference Node	20



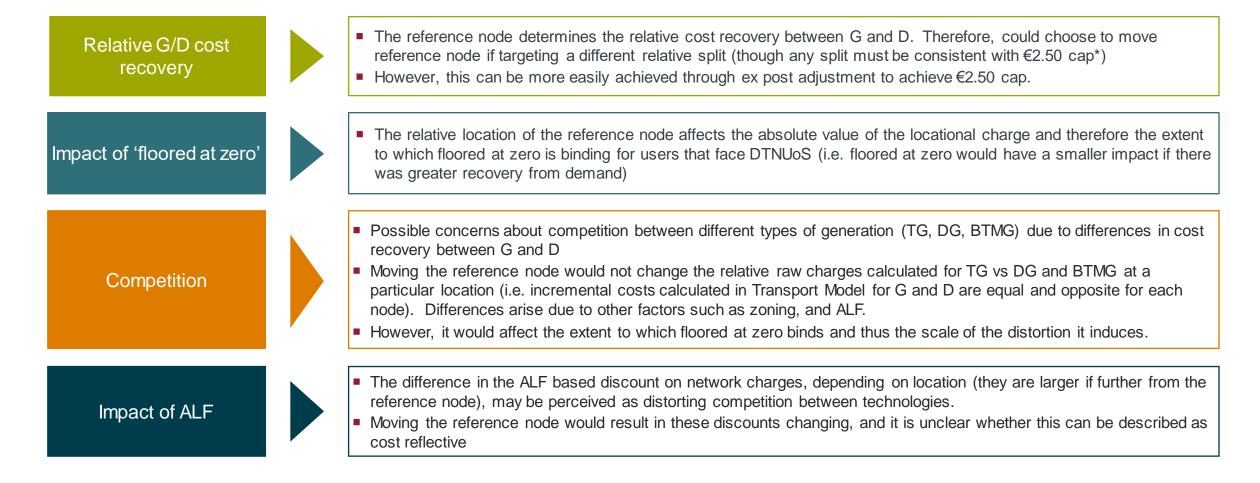
What is the reference node?

The reference node is a concept in the Transport model that determines how flows on the network are assumed to adjust to a marginal increase in generation at a location.

- The Transport Model contains a representative map of the GB transmission system with around 900 nodes
- Each node has *demand* and/or *generation capacity* that creates a 'baseline' system
- TNUoS charges are derived by adding generation capacity and measuring the impact on the network of revised system flows
- 1MW of generation capacity is added to a node. As the system must balance 1MW is also added to demand in the model
- The current reference node is a demand weighted distributed reference node.
 - This means that the 1MW increment to system demand is spread across all the demand nodes in the system in proportion to their contribution to total demand
 - It also means that the reference node is relatively "closer" to demand than generation, making average demand charges = 0, with positive recovery from generation



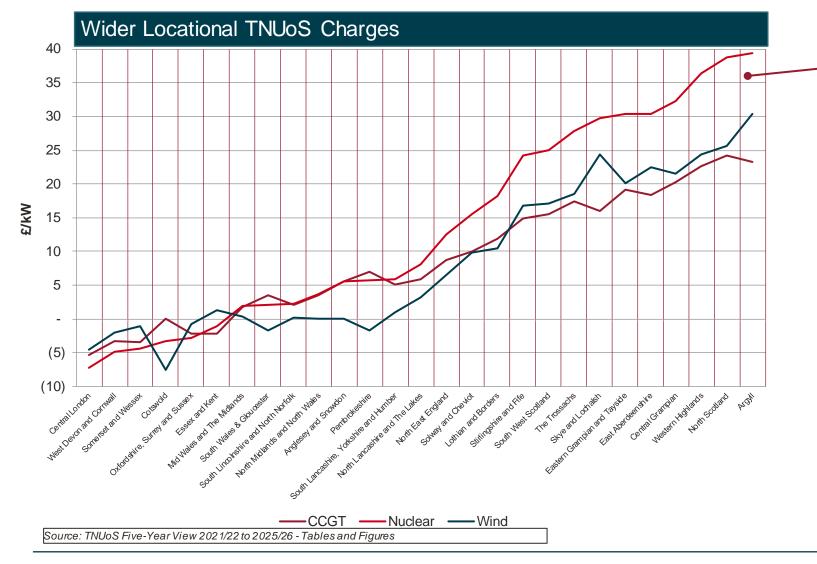
There are a number of potential issues to consider regarding the choice of reference node





*Commission Regulation (EU) No 838/2010 restricts the annual average transmission charges paid by electricity generators in G reat Britain to the range of €0/MWh to €2.50/MWh. This was introduced to try to provide a level playing field for competition between generation capacity in different EU states.

Impact of the reference node on the relative charges for high and low ALF technologies



The gap between high ALF (nuclear) and low ALF (e.g. onshore wind) is larger the further from the reference node.

This is because ALF is applied as a multiplier to the absolute value of the year round charge.

This means that although generation far from the average location of demand faces higher charges, low load factor plant in these locations receive a greater discount on charges relative to a high load factor plant, than an equivalent low load factor plant closer to the reference node.



There are two main options to consider – our initial view is that we do not see a strong argument for moving away from the current approach

Distributed Generation

- Assumes that additional generation always displaces other generation evenly
 - Formally this assumption is that new generation leads to retirement of existing generation rather than one new investment displaces an alternative new investment
- Zero average generation charges & +ve average demand charges
 - Low ALF generators receive no average discount
 - Reduced 'floored at zero' distortion to TG vs DG & BTMG because of higher average demand charges
- Possibly less stable than demand weighted and implies a different reference node for the peak and year round scenarios

Retain distributed demand

- Assumes that additional generation is always matched by additional demand at the average location of demand
 - Logic is that increasing demand is met by generation at a location
- Zero average demand charges & +ve average generation charges
 - Low ALF generators retain average discount
 - Current 'floored at zero' distortion to competition between TG vs DG & BTMG
- Possibly more stable than a generation weighted approach
 - Currently implies a single reference node for both peak and YR scenarios

While there is not a clear conceptual case for choosing one reference node over another, we plan to test the implications for charges of distributed generation and demand weighted reference nodes





Frontier Economics Ltd is a member of the Frontier Economics network, which consists of two separate companies based in Europe (Frontier Economics Ltd) and Australia (Frontier Economics Pty Ltd). Both companies are independently owned, and legal commitments entered into by one company do not impose any obligations on the other company in the network. All views expressed in this document are the views of Frontier Economics Ltd.



Break

Next session starts at 12:00



Feedback & Further Discussion

All

39 > TNUoS Task Force > Meeting 5 > 26 April 2023

Forward Looking Plan

James Stone & Nicola White

40 > TNUoS Task Force >Meeting 5>26 April 2023

Proposed timeline

Considerations



- Following feedback in terms of previous planned timelines, meeting efficiency, potential blockers etc a revised indicative plan has been drafted.
- It is proposed that:
 - Task Force meetings to continue going forward with monthly frequency with fortnightly shorter meetings (check ins/actions updates) held virtually.
 - To revisit defects list in future meetings to identify further packages of work to be undertaken (in addition to areas & analysis already worked on during the pause).
 - Task Force report likely to be phased with initial analysis and options, as outlined today, being the 1st stage to deliver with further iteration at a later date.



Forward Looking Plan

	1								
Activity	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-2
Analytical support & Draft findings									
Task Force Meetings (Potential Topics)									
Mtg5 - Recap + Overview of consultancy support output (analytical assessment)	Mtg5								
Mtg6 - Deep dive assessment areas + Review final analysis & options etc + Identify Gaps									
(analysis) + Review Draft Consultancy Report		Mtg6							
Mtg7 - Further develop work on any gaps identified + Options Development + Consider									
further issue of improving predictability (identify analysis required)			Mtg7						
Mtg8 - Progress work on issue of improving predictability + Solution Development +									
Analysis to support + Agree Draft Report structure & initial content (begin draft)				Mtg8					
Mtg9 - Review & Action Draft Report Feedback + Agree final recommended solutions +									
Agree any actions					Mtg9				
Mtg10 - Finalise draft report structure & content + Agree consultation questions +									
Consultation webinar planning + Issue report for consultation						Mtg10			
Mtg11 - Consultation Response review & summary + Agree final actions to deliver report							Mtg11		
Mtg12 - Review of actions + Compile final report & deliver							WIGHT		
ingre nerren of detons - complic indireport d denter								Mtg12	
NIA Progress Report - Draft begins May-23 + Final report published Jul-23									
6-week Consultation period (TBC)									
Review & action responses / Issue Report to Ofgem									
NIA Completion Report - Draft begins Oct-23 + Final report published Dec-23									

42 > TNUoS Task Force > Meeting 5>26 April 2023



Proposed timeline

Considerations

The following dates have been considered to balance attendance for TCMF, CUSC Panel and holiday period:

- > TF6(f2f) 24th May TF6(a)(v) 12th-16th June
- > TF7(f2f) 26th/27th/28th June TF7(a)(v) 19th/20th/21th July
- > TF8(f2f) 31st July/1st/2nd August TF8(a)(v) 14th-18th August
- > TF9(f2f) 4th/5th/6th/8th September TF9(a)(v) 18th-22nd September







Thank you

