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**Citizens Advice response to CUSC Code Admin consultation - CMP275:
'Transmission Generator Benefits in the provision of ancillary and balancing
services – levelling the playing field'**

Dear Joseph,

We are pleased to be invited to respond to this consultation. Citizens Advice has statutory responsibilities to represent the interests of energy consumers in Great Britain. This document is entirely non-confidential and may be published on your website. If you would like to discuss any matter raised in more detail please do not hesitate to get in contact.

We have outlined answers to the questions in your consultation below.

Question 1: Do you believe that the proposed original or any of the alternatives better facilitate the Applicable CUSC Objectives? Please include your reasoning.

We believe that the baseline better facilitates the Applicable CUSC Objectives over the original Modification proposal and alternative Modification proposal.

In our view, both the original and alternative modification proposals do not facilitate the efficient discharge by the licensee of the obligations imposed upon it under the Electricity Act and licence. We believe that CUSC is not the most appropriate place to make this change. Standard Condition C16 of National Grid's Transmission Licence is the most appropriate place for changes.

In our view, both the original and alternative modification proposals do not facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitate such competition in the sale, distribution and purchase of electricity. Whilst the principle behind the modification proposal is admirable, the System Operator has estimated that the combined cost of STOR and Black Start contracts will increase by £11m per year. We believe that this is the opposite effect that the original modification proposal intended.

Question 2: Do you support the proposed implementation approach? If not, please state why and provide an alternative suggestion where possible.

We cannot comment on the proposed implementation approach.

Question 3: Do you have any other comments?

No further comments.

I trust that this response is clear, but would be happy to discuss any matter raised within it in more depth if that would be helpful.

Yours sincerely

Stew Horne

Principal Policy Manager, Energy Regulation