

1. Do you agree with our assessment of the distributional impacts of the flooring approaches?

*Bryt Energy agrees that not flooring the tariffs at zero would create an incentive for customers in certain regions to consume more at peak times which is not beneficial to the overall system but simply an artefact of the methodology. As this behaviour would be detrimental to the overall system we agree that this incentive should not be created.*

*Likewise, although there is some merit to applying the adjustment to the residual tariffs regionally while capping at zero the additional complexity this introduces may be unwarranted and disproportional to the slight advantage of locational signalling it would provide.*

2. Do you agree that, of the flooring options presented, flooring at 0 best meets the TCR Principles and Applicable CUSC Charging Objectives?

*Yes. The 'No Floor' option sends a signal to systems users to engage in a behaviour which would be distortive and detrimental to the system. The 'Floor with Locational Adjustment' option introduces complexity to the charging methodology which make forecasting the future charges less certain, which in turn will lead to suppliers building in premia to their prices to end customers to cover this uncertainty. 'Floor at zero' is the best option for meeting the CUSC Charging Objectives.*

3. Do you agree with our assessment of the distributional impacts of the banding approaches?

*As Bryt Energy do not have an involvement in this segment of the market and the outcome of their banding approach does not have an impact on costs incurred by other segments we do not feel it would be appropriate to express an opinion on this aspect.*

4. Do you agree that, of the banding options presented, four bands best meets the TCR Principles and Applicable CUSC Charging Objectives?

*As Bryt Energy do not have an involvement in this segment of the market and the outcome of their banding approach does not have an impact on costs incurred by other segments we do not feel it would be appropriate to express an opinion on this aspect.*

5. Do you consider that any of the options presented adequately addresses very small users (including those associated with mixed use sites)?

*As Bryt Energy do not have an involvement in this segment of the market and the outcome of their banding approach does not have an impact on costs incurred by other segments we do not feel it would be appropriate to express an opinion on this aspect.*

6. Do you agree with our minded-to decision to approve CMP343 WACM2?

*Yes.*

7. Do you agree with our minded-to decision that implementation should be delayed by a year, until April 2023?

*Yes, with reservations. Bryt Energy are concerned by the disruption and uncertainty in the supply market which has been caused by the piecemeal changes to the original TCR timeline which have occurred, especially this latest change to have the TNUoS element of the change pushed back a year with less than 12 months' notice.*

*As business supply contracts are frequently fixed for several years in advance this uncertainty has meant different suppliers taking varied approaches to whether they would include a view of the final*

*TCR outcome in the rates they offered, as well as mixed messages to customers around what the impact to their energy bills would be. Introducing the charges with an aligned start date (and a lead time of only two years) and then changing to split the introduction over two dates has ensured that virtually every contract sold in the last few years will now require re-evaluating and the customer potentially facing new costs they did not expect. Contracts signed before TCR unveiling still need to be re-opened to include the impact of TCR DUoS whereas those priced last year also need re-opening to now include the impact of TCR TNUoS being delayed.*

*The bulk of B2B contracts start at the beginning of October as well – the delay from the unofficial ‘minded-to’ letter in April with the consultation only starting in May and the final decision not until August means that a large proportion of this years contract round may have already concluded before the market has certainty on what the impact could be to them.*

*Bryt Energy is unclear why the issues this consultation seeks to address could not have been handled in the original impact assessment or shortly afterwards rather than allowing them to cause this level of disruption to customers.*