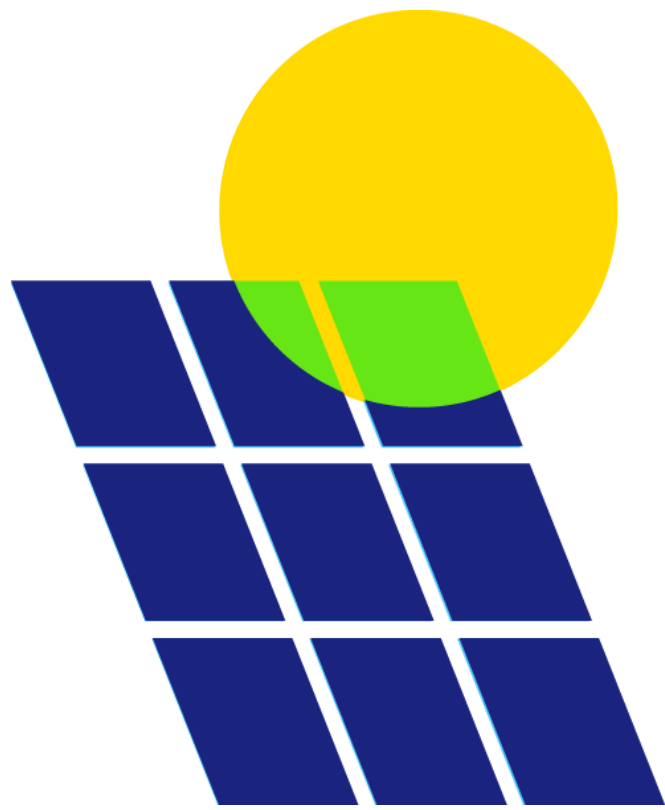




CMP343 – Minded-to decision and draft impact assessment

Solar Energy UK Response



About us

Since 1978, Solar Energy UK has worked to promote the benefits of solar energy and to make its adoption easy and profitable for domestic and commercial users. A not-for-profit association, we are funded entirely by our membership, which includes installers, manufacturers, distributors, utility-scale developers, investors, and law firms.

Our mission is to empower the UK solar transformation. We are catalysing our members to pave the way for 40GW of solar energy capacity by 2030. We represent solar heat, solar power and energy storage, with a proven track record of securing breakthroughs for all three.

Respondent details

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Organisation Name: Solar Energy UK

Would you like this response to remain confidential? No

Responses to Questions

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

No comment.

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

We would agree that within the scope of this modification to develop a solution for the recovery of residual costs it is appropriate to maintain flooring at 0. However, we note the concern of many of our members, particularly in the north of England and Scotland with regards to the proposed TNUoS charging methodology.

Solar Energy UK looks to the forthcoming reforms of the Access and Forward-Looking Charges SCR to address these concerns.

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

No comment.

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

Yes, we agree. Of the banding options considered, four bands appears to best meet the principles of fairness, reducing distortions, and proportionality. We would also agree that the four band option meets the CUSC Objective of promoting efficiency in the charging methodology.

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

Again, we believe that of the options presented the four band option, which allocates a proportional contribution to different sized sites towards network residual charges, is the most appropriate of the options presented for addressing smaller users.

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

Yes.

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

Our members have expressed that the initial proposed implementation date of 1 April 2022 would still give industry an adequate amount of time to comply.