

Citizens Advice – response from email

Please see our response below:

We welcome the opportunity to respond to this consultation on Ofgem's minded-to position on CMP343 which implements changes to the Transmission Demand Residual (TDR) following the Targeted Charging Review.

We are supportive of Ofgem's minded-to position to approve WACM2 which will implement four bands for the TDR for transmission-connected final demand and floors the forward looking charge at 0. However, we are concerned that a delay to implementation by a year to April 2023 may be too cautious and therefore delay consumer benefits.

We note that Ofgem considers an increased risk of disconnections with consequential impacts on consumers overall. However, we believe this risk to be small compared to the consumer benefits that implementation in April 2022 would bring to consumers.

Although the charges for some users may increase relative to the original TCR impact assessment, the potential changes to that position in 2018 have been known for some time through CUSC workgroups in 2020 and evidenced by the consultation responses during the CUSC code admin consultation in September 2020.

As Ofgem are minded to approve WACM2 which received the largest majority vote by CUSC panel, this potential outcome was known 7 months prior to Ofgem's minded-to position and 18 months ahead of the originally planned implementation date.

We would welcome further consideration by Ofgem of the likelihood that disconnections would take place in direct response to implementation in April 2022 rather than any risks of disconnections taking place in response to the overall TCR decision.

All the best,

Sam