

Abellio Group – response from email

Response to the CMP343 – Minded-to decision and draft impact assessment.
Please see response to the questions in your draft impact assessment.

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

We believe that the forward looking signal proportion of the TNUoS tariff will be further assessed in the Review of Access and Forward Looking charges Significant Code Review and therefore we feel that a least distortive approach is the most prudent.

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

Please see answer to Question 1.

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

Yes.

We are pleased to note that Ofgem has recognised that there are many different sized sites connected to the transmission network and the assessment reflects this to reach the conclusion that a 4-band option is the best choice.

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

Yes. The 4-band option is fair, proportional and better meets the TCR principles and CUSC objectives against the 1-band and 2-band options.

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

We think Ofgem should keep under review the possibility of creating a set of tariffs specifically for very small sites should there be evidence that they could face substantially higher charges. Ultimately charges should follow the TCR principle of being fair and proportionate to all users.

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

Yes. In our previous response to the workgroup report we supported the 4-band option. The CUSC Panel voted for this option unanimously along with a majority of customers connected to the transmission network.

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

Yes. The analysis presented shows that some sites face significant cost increases and an additional year allows them to budget for this cost.

Regards

Adam

(Chair of Electric Current 4 Traction Scheme Council for Rail Delivery Group)