

DRAX via email, 11 August 2025

Response received to the CMP444 minded-to consultation

We are delighted to provide a non-confidential response to the consultation on CMP444.

We agree with Ofgem's minded to decision to reject CMP444 *Introducing a cap and floor to wider generation TNUoS charges*. We also agree with Ofgem's assessment against all the applicable objectives. In our response to the Code Administrator consultation, we indicated that there may be some merit in both the original proposal and WACM 7 against the new Applicable Objective (AO) (d) - *facilitating competition*. We stated that both proposals address the defect without overly blunting locational signals. However, in light of the recent REMA decision, we consider all options would have a negative effect against AO (d). Additionally, given that there are likely to be significant changes to the TNUoS methodology as a result of Ofgem's upcoming review, we believe that making any change now, would impact negatively on AO (h) – *promoting efficiency* – and AO (e) – *cost reflectivity*. We therefore agree with the decision to reject the proposal, as approval would embed changes that may need to be unwound in the near future.

If you have any questions please don't hesitate to get in touch.

Kind regards

Paul Youngman

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