

From: Andrew Causebrook [<mailto:andy@ac-renewables.co.uk>]
Sent: 30 May 2011 12:12
To: Project TransmiT
Subject: Response to Consultation on SCR

Hello,

I am responding briefly to invitation to comment on the need for and scope of a review of TNUoS charging.

Although I am a strong supporter of cost-reflective charging I am convinced of the need for an in-depth review to examine options to deliver connections for new generation in the most economic and efficient manner. The timing is important because there is currently an unacceptable level of uncertainty over the impact of the new wave of major reinforcements (HVDC links in particular) on future TNUoS charges. This means that it is impossible to model the long-term viability of a new generation projects. This review further increases uncertainty and must therefore be completed in the shortest possible time and certainly before 1 April 2012.

I believe the scope of the review should logically include charges for losses since is also part of the overall charging structure and fits into the bigger debate over locational vs uniform charging. However, this scope extension should not be pursued if it will put the overall timeframe at risk.

I also think that the review should include consideration of TNUoS charging for embedded generation since this is a very obvious anomaly in the present charging system, creating large distortions in financial incentives and inefficient connection arrangements.

Regards,
Andy

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