

## ACTION 01/01: Find/collate and circulate any relevant materials related to the CUSC and BSC modifications to the Working Group.

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**By Nicholas Rubin**

For info – the following is my own overall summary of the CMP280/281 solutions which may be of use to you in case you want to borrow or, in the interests of consistency, align with it – please note it is not the final solution and in the interests of time I have not captured all elements/details:

- In general, imports to declared SVA and CVA Storage Facilities will be excluded from the calculation of TNUOS Residual Demand Charges (per CMP280 alternative proposal; nb the CMP280 original is only focused on CVA Storage) and BSUOS Demand Charges (per CMP281).
- Storage Operators\*\*\* must declare their facilities either to their Supplier (for SVA) or NGESO (for CVA with a BCA or BEGA)
- The declaration:
  - confirms that a Storage Facility\*\* can be an SVA Storage Facility\* or a CVA Storage Facility\*, where:
    - An SVA Storage Facility is a configuration of plant and apparatus whose sole purpose is Electricity Storage\*\* and where all Imports and Exports to the facility are measured by HH Metering Systems registered for SVA
    - A CVA Storage Facility is configuration of plant and apparatus, registered in one or more BM Units, whose sole purpose is Electricity Storage and where all Imports and Exports to the facility are measured by Metering Systems registered for CVA.
- An SVA or CVA Storage Facility's Metering Systems measure Imports that are for the sole purpose of operating that Storage Facility
  - This may include imports to plant and apparatus which are not by themselves performing Electricity Storage but are essential/integral to the facility performing Electricity Storage.
- Process for SVA Storage facilities:
  - A declaration to a Supplier for an SVA Storage Facility is passed by the Supplier to SVAA.
  - The SVAA validates the declaration – i.e. checks that it complies with the CUSC requirements/definition of an SVA Storage Facility
  - SVAA uses D0354 to instruct HHDA(s) to report HH Imports and Exports\*\*\*\* to the SVAA using the D0385.
  - SVAA aggregates the HH metered data to Supplier BMU level and subtracts aggregated storage Imports from the Supplier BMUs total Imports. SVAA reports both values (i.e. the aggregated Storage Imports and the corrected total Supplier Imports) to NGESO using P0210 report
  - NGESO uses the Supplier BMU Imports less Storage Imports to calculate TNUOS Residual Demand Charges and BSUOS Demand Charges
  - SVAA/BSCCo and BSC Panel perform assurance measures to validate declarations, identify anomalous behaviour (which may result in MSIDs being excluded from the SVAA's aggregation of metered data) and provide summary statistics.
- Process for CVA Storage facilities
  - Storage Operators agree with NGESO to identify BMUs that are a part of a CVA Storage Facility in the relevant BCA or BEGA
  - Now knowing which BMUs are CVA Storage Facilities, NGESO can identify these BMUs' metered data (which is already reported to NGESO by ELEXON) and excludes these volumes from its calculation of TNUOS Residual Demand Charges and BSUOS Demand Charges
  - NGESO may monitor for compliance with CUSC and BCA/BEGA and take action where appropriate

\* will be a new CUSC term

\*\* will be a new CUSC term though based on Ofgem's proposed licence definition

\*\*\* possibly a new CUSC or BSC term

\*\*\*\* Exports only necessary for assurance purposes, i.e. only the Imports are excluded from charge calculation

***Possible benefits of aligning with CUSC/BSC solution:***

My understanding of the proposed DCUSA solutions is that Suppliers will identify Metering Systems for storage facilities and report these to the relevant DNO. Using HH metered data it already receives, it can identify the storage Metering Systems' metered data and exclude these from its calculation of DUOS charges.

In my opinion, if ELEXON is keeping a register of SVA Storage Facilities and MSIDs for TNUOS and BSUOS purposes, assuming the definitions of a SVA Storage Facility are the same or at least very similar between CUSC and DCUSA, ELEXON could notify DNOs of the SVA Storage MSIDs it registers. This would save Suppliers notifying ELEXON and separately DNOs, ensure there is a single, common registration record for SVA Storage MSIDs and mean that BSC assurance measures we apply in validating SVA Storage Facilities provide value to both CUSC and DCUSA Parties.