

## Questions for Informal Consultation

National Grid would welcome responses to the following questions in preparation for the Formal Consultation expected to take place upon resubmission of the proposals:

### **Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)**

ESB is supportive of charging reform being complete, robust and transparent. We believe the proposals under the 0718/GCD12 banner as they stand at 15 May 2020 are not sufficiently robust and transparent. Specifically, the distance limit selected appears arbitrary, the change in distance from 28km to 18km was not transparently justified and there is circularity within the calculation designed to manage the socialisation pot of money. We agree that 718C's use of capacity discounting enhances TAR compliance and a flow-related discount may not be considered compliant.

### **Implementation: What lead-time do you wish to see prior to implementation and why?**

The lead time should be as long as possible. We would prefer holistic charging reform to be implemented Oct 2021 at the earliest, or Oct 2022. This would provide more time for development of a robust solution and sufficient notice to industry parties.

### **Impacts and Costs: What analysis, development and ongoing costs would you face?**

We would require a review of costs and operations in line with any change to charging levels and products, which in combination with wider charging reform would be significant.

### **Legal Text: Are you satisfied that the legal text will deliver the intent of the Solution?**

We have not reviewed the legal text.

The closing date for submission of your responses is **Friday 15<sup>th</sup> May**. Responses will be published as part of this discussion unless marked as confidential. Your response should be emailed to:

[box.gsoconsultations@nationalgrid.com](mailto:box.gsoconsultations@nationalgrid.com)