

**Conclusions Report to Ofgem
On Use of System Charging Methodology Modification:**

UoSCM-M-03

**Calculation of TNUoS Demand Charges and
Allocation of Triad Benefits for Trading Units
Which Contain More Than One Supplier BM Unit**

29 October 2001

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1. INTRODUCTION

Use of System Charging Methodology modification UoSCM-M-03 set out for consultation National Grid's proposal to modify the rules for calculating the TNUoS demand charges and allocating the Triad Benefit within a Trading Unit to cater for the case of there being more than one Supplier BM Unit in a Trading Unit.

The consultation process ran from 21 September to 19 October 2001.

Following the consultation period, this report sets out Users' responses to the proposed modification and the changes to the proposal resulting from those responses.

2. TERMS OF THE ORIGINAL PROPOSED MODIFICATION

Description of proposed modification to the Use of System Charging Methodology

To add new rules for calculating the TNUoS demand charges and allocating the Triad Benefit within a Trading Unit to cater for the case of there being more than one Supplier BM Unit in the Trading Unit:

- The Lead Parties of all the Supplier BM Units are individually responsible for their TNUoS demand charges associated with their own Supplier BM Units. In addition they get a proportional share of the total demand charges associated with all the Exempt Export BM Units in the same Trading Unit.
- The Triad Benefit is assigned to the Supplier BM Units. The individual maximum useable Triad Benefit for each Supplier BM Unit remains at its demand charge liability. The Triad Benefit arising from SVA registered Licence Exemptable Generators (LEGs) will be first credited to the Supplier BM Units they belong before any surplus is distributed amongst the other Supplier BM Units up to their individual demand charge liability. The default allocation method will be in proportion to the demand charge liabilities of all the Supplier BM Units within the Trading Unit. However, Users will be able to notify their own allocation arrangements, by 30 September (or a later date specified by National Grid) of the Financial Year.

Explanation of the issue

The current rules for calculating the TNUoS charges for Supplier demand and allocating the Triad Benefit in a Trading Unit only cater for the case of there being no more than one Supplier BM Unit in the Trading Unit. If the BSC Modification P7 is approved by the Authority, a Trading Unit can contain any number of Supplier BM Units situated in the same GSP group. New charging rules are therefore required.

Justification for proposed modification

To better facilitate competition in generation and supply.

Suggested alternatives

- For demand charge liability, two alternatives were considered.
 - a) The Lead Parties of all the Supplier BM Units are individually responsible for their TNUoS demand charges associated with their own Supplier BM Units. In addition they get a proportional share of the total demand charges associated with all the Exempt Export BM Units in the same Trading Unit.
 - b) The Lead Parties of one Supplier BM Unit is nominated to be responsible for all the TNUoS demand charges in the whole Trading Unit.

The modification proposal was to adopt Option a).

- For allocating the Triad Benefits within a Trading Unit, four alternatives were considered.

Methods requiring no notifications from Users

- a) in proportion to the total remaining demand charges each Supplier BM Unit would be liable for;
- b) in equal portion to each Supplier BM Unit;

Methods requiring notification from Users

- c) in an order informed by the Trading Unit members, each time netting off up to 100% of the remaining demand charges of a Supplier BM Unit; and
- d) with certain amount or percentages to Supplier BM Units as specified by the Trading Unit members.

The modification proposal was to adopt Option a) as the default non-notification allocation method while maintaining Option c) for Users to notify their allocation order.

Implementation date

To be determined (intended for 1 November 2001).

Proposed changes to the Statement of the Use of System Charging Methodology

To be finalised once the methodology is agreed. Some suggested text for relevant parts of the Statement based on the proposed methodology is outlined below.

Page 20, Paragraph 4.1

“The Lead Parties of the Supplier BM Units belonging to the same Trading Unit are liable for demand charges for the Trading Unit. For the purposes of this document we have defined the above parties as Suppliers. **‘Appendix TN-5: Classification of parties for charging purposes and what Transmission Network Use of System charges they will be liable for’** provides an illustration, for information purposes, of how a party is classified and for what charges they will be liable.”

Page 20, Paragraph 4.2

“Suppliers pay final demand charges as follows:

- Each Supplier’s final charges for half-hourly metered demand will be based on the average of the actual demand of its Supplier BM Unit supplied during the Triad plus a share of the aggregate metered import by the Exempt Export BM Units belonging to the same Trading Unit.
- Each Supplier’s final charges for non-half-hourly metered demand will be based on the actual energy consumption of its Supplier BM Unit over the period 16:00hrs to 19:00hrs inclusive (i.e. settlement periods 33 to 38 inclusive) over the Financial Year.

The detailed rules for allocating the demand charges in a Trading Unit with multiple Supplier BM Units are included in the section titled “Triad Trading as a Trading

Unit”, Paragraph 5.25.”

Page 26, Paragraph 5.25

Replace the whole paragraph with the following:

“Triad Benefit resulting from the export at Triad of a Supplier BM Unit or an Exempt Export BM Unit can be traded to other Supplier BM Units with whom it jointly forms a Trading Unit. The allocation of the Triad Benefit will follow the following steps.

- i) The initial demand charge liability associated with each Supplier BM Unit is calculated first. This is the sum of the following two elements:
 - half-hourly metered demand charges, which is the average import of its Supplier BM Unit at Triad times the £/kW demand tariff; and
 - non-half-hourly metered demand charges, which is the actual energy consumption of its Supplier BM Unit over the period 16:00hrs to 19:00hrs inclusive over the Financial Year times the £/kWh energy consumption tariff.
- ii) For a Supplier BM Unit whose total initial demand charge liability is negative due to the Triad Benefit from its SVA registered Licence Exempt Generators exceeding its demand charge liability, the final demand charge liability for the Supplier will be zero, and the surplus Triad Benefit is noted as the initial Triad Benefit produced by this Supplier BM Unit.
- iii) The additional demand charge liability associated with all Exempt Export BM Unit importing at Triad is calculated as the total average import during the Triad times the £/kW demand tariff. This is then shared by all Supplier BM Units in proportion to their initial demand charge liabilities.
- iv) The initial Triad Benefit of any Exempt Export BM Unit exporting at Triad is individually calculated. This is its average export over Triad times the £/kW demand tariff of the relevant Demand zone.
- v) The notified allocation will be carried out. The initial Triad Benefits produced by any BM Unit in the Trading Unit will be assigned to the Supplier BM Units according to arrangements notified to NGC by 30 September (or a later date specified by National Grid) in the Financial Year in question. If the total resulting Triad Benefit assigned to a Supplier BM Unit exceeds its initial demand charge liability as modified in iii) above, then the surplus Triad Benefit will be disregarded. This step results in the remaining demand charge liabilities of the Supplier BM Units.
- vi) Any surplus Triad Benefits not covered by any notified allocation agreements are then added up as the remaining Triad Benefit and compared to the total remaining demand charge liabilities of all the Suppliers in the Trading Unit. If the remaining Triad Benefit exceeds the total remaining demand charge liabilities then the final demand charge liabilities for all Suppliers will be set to zero and the overall surplus Triad Benefit will be disregarded. Otherwise the remaining Triad Benefit is shared out amongst all the Suppliers in proportion to their remaining demand charge liabilities.”

Proposed changes to the Statement of Use of System Charges

None.

Impacts on existing Use of System charges

None.

Impacts on other Industry Documents

None.

3. RESPONSES TO THE MODIFICATION PROPOSAL

Comments and views were invited on all the issues raised in the Modification Proposal up to 19 October 2001.

National Grid has received four responses on this Modification Proposal. The details of these responses are included in Appendix 1 of this report.

Three of the responses supported National Grid's proposal. The remaining one agreed that the modification proposal is "a step in the right direction", but questioned the necessity and logic of linking transmission charging with metering and Trading Unit arrangements for the purpose of energy trading.

One respondent asked about the arrangements for this year's notification date for User specified allocation, given that the proposed normal notification deadline of 30 September had passed and the start of the Triad season (1 November) was close. Another respondent did not believe that any advance notification was necessary and suggested post-event notification.

Some clarification on the extent of Triad Benefit allocation and parties eligible for receiving Triad Benefits was requested by one respondent.

4. CHANGES TO THE PROPOSAL IN LIGHT OF REPRESENTATIONS MADE

In the light of the responses received, National Grid does not intend to make any changes to the modification proposal summarised in section 2, namely:

- Demand charge liability in a Trading unit
The Lead Parties of all the Supplier BM Units are individually responsible for their TNUoS demand charges associated with their own Supplier BM Units. In addition they get a proportional share of the total demand charges associated with all the Exempt Export BM Units in the same Trading Unit.

and

- Triad Trading as a Trading Unit
The Triad Benefit is assigned to the Supplier BM Units. The individual maximum useable Triad Benefit for each Supplier BM Unit remains at its demand charge liability. The Triad Benefit arising from SVA registered Licence Exemptable Generators (LEGs) will be first credited to the Supplier BM Units they belong before any surplus is distributed amongst the other Supplier BM Units up to their individual demand charge liability. The default allocation method will be in proportion to the demand charge liabilities of all the Supplier BM Units within the Trading Unit. Users will also be able to notify their own order of allocation arrangements, by 30 September (or a later date specified by National Grid) of the Financial Year.

However, there are a few additional issues raised that need to be addressed.

Arrangement for this charging year's notification for User specified Triad Benefit allocation in a Trading Unit

We note that the proposed notification deadline has passed for this year and an alternative arrangement needs to be made. The new Triad Trading rules contained in this modification can take any effect only if the BSC modification P7 is also implemented. At the time of submitting this report, we have no indication of the likely outcome of Ofgem's consideration on the BSC P7 modification. Therefore we are not in a position to propose a fixed alternative notification deadline for this year. However, National Grid will make best endeavours to accommodate Triad Trading options preferred by the Users for this charging year. Provided that appropriate notifications are received **by the date from which any new Trading Unit registration becomes effective**, such notifications will be reflected in the Triad Benefit allocation. The issue of the general notification requirement will be taken into account in future reviews of the Use of System Charging Methodology.

Clarification on extent of Triad Benefit allocation

Under the current charging principles, the Triad Benefits generated by Licence Exemptable Generators (LEGs) are allocated to Supplier BM Units by the following methods:

- Output of LEGs registered in SVA by a Supplier is allocated to the Supplier BM Unit in which it is registered;
- National Grid facilitated Triad Trading between Supplier BM Units and CVA registered LEGs in Trading Units not containing any Supplier BM Units in the same GSP Group; and
- Triad Trading between CVA registered LEGs and Supplier BM Units (which may or may not include SVA registered LEGs) in the same Trading Unit.

Triad Benefit surplus from, or not covered by, the above Triad Trading methods will be disregarded. This point will be further clarified by distinguishing, in the revised text for Paragraph 5.25, "Supplier BM Units in the same Trading Unit" from "Supplier BM Units in the same GSP Group".

Interaction between transmission charging and BM Unit or Trading Unit arrangements

The issue of whether Triad Benefit allocation should be limited to the existing three methods or indeed whether transmission charging should be dependent on the BM Unit and Trading Unit arrangements is much wider than the scope covered in this modification. National Grid will take this into account in any future reviews of the principles of Triad Trading.

Modification to the Statement of the Use of System Charging Methodology

The modification will result in a revised Statement of the Use of System Charging Methodology. In light of the comments received, the revised text as suggested in the original proposal has been enhanced for further clarity. The proposed new text is included in Appendix 2 of this report.

Modification to the Statement of Use of System Charges

The Statement of Use of System Charges will also be updated to reflect the version change of the Statement of the Use of System Charging Methodology. The proposed new text is included in Appendix 3 of this report.

5. HOW THE PROPOSED MODIFICATIONS BETTER MEET THE RELEVANT OBJECTIVES

The proposed modifications would enable the charging methodologies to better meet the relevant objective as set out in the transmission licence condition C7A.5(a):

“that compliance with the use of system charging methodology facilitates effective competition in the generation and supply of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity”.

6. TIMETABLE FOR IMPLEMENTATION

Our initial proposed implementation date for UoSCM-M-03 was 1 November 2001, i.e. the start of the Triad season. That date took into account our expectation then that the BSC Modification P7 would be implemented by 1 November 2001.

However, at the time of submitting this report, we have not been able to acquire confirmation from Ofgem regarding the outcome of their consideration of BSC Modification P7. Whilst UoSCM-M-03 can be implemented independently of any changes to the BSC, it can only take any real effect if the BSC is modified according to P7. In light of there being no Ofgem decision on the BSC modification P7, there is no justification for National Grid to request Ofgem to give dispensation for an implementation date before the expiry of the 28 day consideration period. We propose an implementation date for this modification 28 working days after the submission of this report, ie **26 November 2001**. National Grid also proposes to make the consequent changes to the Statement of the Use of System Charging Methodology and the Statement of Use of System Charges, both to be numbered Issue 1 Revision 2, for issue on **26 November 2001**.

APPENDIX 1 – RESPONSES TO MODIFICATION PROPOSAL

PowerGen

Powergen support the proposed changes to the Use of System Charging methodology proposed by NGC. Allocating the TNUoS demand charges to the Lead Party seems to be the most efficient means of levying these charges. We also flexibility the flexibility for Users to notify their own allocation arrangements in respect to sharing Triad benefit.

Assuming modification P7 will be approved shortly, we trust NGC will be in a position to implement these changes for 1 November 2001.

British Energy

Further to the above consultation document issued in respect of the above proposed modification, British Energy are pleased to advise broad support for the proposal and advise the following comments:-

- Given the privileged status afforded by government policy to exempt generators and "associated" suppliers in respect of transmission related charges, the recommendations in the paper by NGC presents reasonably pragmatic 'default' allocation methods (option (a) for non-notification and option (c) for advance notification) of allocating "Triad Benefits" of TNUoS charges between parties to a Trading Unit and other parties
- Clearly the Triad season is fast approaching and, as any implementation of this modification is also subject to the BSC Mod P7 approval, there will potentially be little or no time for any advance notification of allocation to be performed in line with the proposed modification; certainly the 30th September date has already gone for this year. It would be useful to understand whether and what contingency arrangements NGC is considering to propose for any 'special' allocation notification procedure given that the 1st November is almost here.
- NGC in its previous LC10 statement and more recently since CUSC, the Statement of Use of System Charging Methodology, advise that they will facilitate the Triad trading for Exempt Export BMU's (i.e. basically licence exempt generators who choose to register their meters in CVA). This is to an extent a continuation of the facilitation service offered by NGC under the Pool whereby NGC would facilitate Triad trading on behalf of non-centrally despatched Pooled embedded generators. NGC do not facilitate for generators not registered as BM units (in the same way they did not facilitate under the Pool for non-centrally despatched non-Pooled generators). Therefore, implementation of the changes proposes should not result in NGC's role as a Triad trading facilitator being extended beyond that already set out in The Statement of Use of System Charging Methodology.
- The proposal should refer explicitly to "Supplier BM Units in the Trading Unit" and "Supplier BM Units not in the Trading Unit but in the same GSP Group" to avoid confusion over where spill (or "surplus triad benefit") is disregarded or allocated.
- We would also advise the following additional observations:

- Creation of a Trading Unit under the BSC requires agreement of all the parties to the Trading Unit. The effect of forming a Trading Unit on BSC Trading and other charges and on BSUoS charges are laid out in the BSC and the NGC BSUoS charging statement, and parties to a Trading Unit can take account of these effects as part of the agreement between themselves to form a Trading Unit. It appears consistent with this that the effect of forming a Trading Unit on TNUoS charges should also be laid out as a firm set of rules, which parties may take into consideration at the same time as the other charges at the time of entering into a BSC Trading Unit arrangement. However we note again the potential overlap of BSC/BSUoS/TNUoS governance issues that arise.
- The set of rules proposed by NGC appears thorough and reasonable in this respect, with the default apparently being for:
 - (a) exempt export within a Supplier BM Unit simply netted from that BM Unit's demand up to the level where spill occurs and
 - (b) exempt export spill from Supplier BM Units or Exempt Export BM Units within the Trading Unit to be "allocated":-
 - (i) firstly against remaining demand of Supplier BM Units in the Trading Unit (but not demand of Exempt Export BM Units, which I assume to be exempt from demand charges in their own right, putting them on a par with Supplier BM Units with no remaining "demand charge liability");
 - (ii) secondly against demand in other Supply BM Units (and I assume this is within the same GSP Group) and
 - (iii) thirdly any remaining spill to be "lost" as far as Triad Benefit is concerned.

We would appreciate NGC confirmation that our understanding set out above is correct.

Slough Energy Supplies Ltd

It is not clear to us that all of this modification is necessary. We agree that Triad Benefit should be capable of being spread among several Supplier BMUs within a GSP Group, as to the extent that the net flow for a GSP Group is import/demand, then it is quite clear that the embedded generation can be regarded as not flowing across the transmission system. It should therefore be possible to allocate "Triad" from embedded generation to any Supplier(s) within the GSP Group, and this should not be constrained by metering / trading unit arrangements for the purposes of energy allocation. To this extent this modification is a step towards the right end, but it is not a complete solution.

The modification also suffers from trying to ensure that "allocation" is carried out by 30th September. There is no current logic or necessity to this timing. It would make the modification much simpler if the "allocation" could be done after the event. This removes the requirement for the complex re-allocation options which the modification proposes. It is reasonable that, before the triad season starts (say by 31st October), NGC is advised that Triad arrangements are in place between particular trading units / generators /suppliers. Once the season has finished, those parties can notify NGC

of the allocation between them, or of any re-allocation following an initial prior indication.

(The 30 September deadline arose from a time when not all small generation had appropriate metering in place, and when many calculations were done by differences". The time-scale was to allow time for NGC to inform the host REC so that if necessary half-hourly metering could be installed before the triad season began. The 1998 changes meant that calculations are done differently, and also require all small generation to have half-hourly metering.)

Innogy

NGC's Consultation Paper dated 21st September 2001 sets out a number of alternatives that would enable the embedded TNUoS benefits arising from one or more Exempt Export BMUs to be assigned to one or more Supplier BMUs within the same Trading Unit. Before considering these we would note that the underlying principles should:

- (a) Permit parties to notify NGC jointly of the required allocation process for that particular Trading Unit, and
- (b) Ensure that all embedded benefits attributable to the Export Exempt BMUs within the Trading Unit can be obtained to their full extent.

However, we recognise that there may be a need for a default allocation process that will cover instances where no notification has been provided to NGC, or where a Supplier ceases trading. In relation to the specific options described in the Consultation Paper we would make the following comments:

TNUoS Charges for Supplier Demand in a Trading Unit

Our preferred option under this heading is (a), which requires that the Lead Parties of all Supplier BMUs are individually responsible for their TNUoS demand charges net of an agreed share of the embedded benefits arising from the Export Exempt BMUs. We do not support option (b) given the difficulties that might arise should the nominated Supplier cease trading.

Triad Trading as a Trading Unit

We agree with NGC's proposal that the Triad benefits arising from SVA registered LEGs are allocated first to the Supplier BMUs in which they belong before any surplus benefit is distributed to other Supplier BMUs within the Trading Unit.

Methods requiring no notification from Users

As noted above methods that do not require notification by Users should only apply as a default in circumstances where no allocation notification has been provided by the Trading Unit to NGC. From the choice presented here we would elect for option (a), which allocates the Triad benefit to each Supplier in proportion to the total remaining demand charges for which each Supplier would be liable. We do not support option (b) since this may not result in all of the Triad benefit being captured by the Supplier BMUs.

Methods requiring notification from Users

Our choice here is for Option (c). In this case the Triad benefit is netted-off up to 100% of the remaining Supplier demand charge pursuant to an order notified by the Trading Unit to NGC. We do not support option (d), which suffers the same defect as (b) above and may result in only part of the potential Triad benefit being earned by the Supplier BMUs.

APPENDIX 2 – PROPOSED NEW TEXT FOR THE STATEMENT OF THE USE OF SYSTEM CHARGING METHODOLOGY

The proposed new text for the Statement of the Use of System Charging Methodology is as follows.

Page 20, Paragraph 4.1

“The Lead Parties of the Supplier BM Units belonging to the same Trading Unit are liable for demand charges for the Trading Unit. For the purposes of this document we have defined the above parties as Suppliers. **'Appendix TN-5: Classification of parties for charging purposes and what Transmission Network Use of System charges they will be liable for'** provides an illustration, for information purposes, of how a party is classified and for what charges they will be liable.”

Page 20, Paragraph 4.2

“Suppliers pay final demand charges as follows:

- Each Supplier’s final charges for half-hourly metered demand will be based on the average of the actual demand of its Supplier BM Unit supplied during the Triad plus a share of the aggregate metered import by the Exempt Export BM Units belonging to the same Trading Unit.
- Each Supplier’s final charges for non-half-hourly metered demand will be based on the actual energy consumption of its Supplier BM Unit over the period 16:00hrs to 19:00hrs inclusive (i.e. settlement periods 33 to 38 inclusive) over the Financial Year.

The detailed rules for allocating the demand charges in a Trading Unit with multiple Supplier BM Units are included in the section titled “Triad Trading as a Trading Unit”, Paragraph 5.25.”

Page 26, Paragraph 5.25

“Triad Benefit resulting from the export at Triad of a Supplier BM Unit or an Exempt Export BM Unit can be traded to other Supplier BM Units with whom it jointly forms a Trading Unit. The allocation of the Triad Benefit will be according to the following steps.

- i) The **initial demand charge liability** associated with each Supplier BM Unit is calculated first. This is the sum of the following two elements:
 - half-hourly metered demand charges, which is the average import of its Supplier BM Unit at Triad multiplied by the relevant £/kW demand tariff; and
 - non-half-hourly metered demand charges, which is the actual energy consumption of its Supplier BM Unit over the period 16:00hrs to 19:00hrs inclusive over the Financial Year multiplied by the relevant p/kWh energy consumption tariff.

- ii) For a Supplier BM Unit whose total **initial demand charge liability** is negative due to the Triad Benefit from its SVA registered Licence Exempt Generators exceeding its demand charge liability, its **initial demand charge liability** will be reset to zero, and the surplus Triad Benefit is noted as the **initial Triad Benefit** produced by this Supplier BM Unit.
- iii) The additional demand charge liability associated with all Exempt Export BM Units importing at Triad is calculated as the total average import over the Triad multiplied by the relevant £/kW demand tariff. This additional charge is then allocated to all the Supplier BM Units in proportion to their **initial demand charge liabilities**.
- iv) The **initial Triad Benefit** of any Exempt Export BM Unit exporting at Triad is individually calculated. This is its average export over Triad multiplied by the relevant £/kW demand tariff.
- v) The **initial Triad Benefit** produced by any BM Unit, as described in ii) and iv) above, is first allocated to the Supplier BM Units in the same Trading Unit by a notified order, which must be notified to NGC by 30 September (or a later date specified by NGC) in the Charging Year in question. The **initial Triad Benefit** covered in such notification will be assigned to the Supplier BM Units up to the **initial demand charge liability** of each Supplier BM Unit, according to the notified order. If the total Triad Benefit assigned to a Supplier BM Unit exceeds its **initial demand charge liability** as modified in steps ii) and iii) above, then the surplus Triad Benefit will be disregarded. This step results in the **remaining demand charge liabilities** of the Supplier BM Units.
- vi) The **initial Triad Benefits** produced by any BM Units, as described in ii) and iv) above, which are not covered in the notified allocation agreement are then added up as the **remaining Triad Benefit**. If the **remaining Triad Benefit** exceeds the total **remaining demand charge liabilities** of all the Supplier BM Units in the same Trading Unit, then the final demand charge liabilities for all Suppliers BM Units in the same Trading Unit will be set to zero and the overall surplus Triad Benefit will be disregarded. Otherwise the **remaining Triad Benefit** is shared out amongst all the Suppliers BM Units in the same Trading Unit in proportion to their **remaining demand charge liabilities**."

APPENDIX 3 – PROPOSED NEW TEXT FOR THE STATEMENT OF THE USE OF SYSTEM CHARGES

The proposed new text for the Statement of the Use of System Charging Methodology is as follows.

“About this Document”, 3rd paragraph

“... The charges within it are derived from the methodology set out in the **Statement of the Use of System Charging Methodology Version 1/ Revision 4-2.**”

Page 1, 4th paragraph

“the **Statement of the Use of System Charging Methodology Version 1/ Revision 4-2.**”

Page 3, 7th paragraph

“... This is intended as an illustrative overview, the **Statement of the Use of System Charging Methodology Version 1/ Revision 4-2** and the ...”

Page 3, last paragraph

“The following summary outlines the Charging ~~Rules~~ **Methodology** in place ~~from 1 April 2001.~~”

Page 5, 3rd paragraph

“... the **Statement of the Use of System Charging Methodology Version 1/ Revision 4-2.**”

Page 5, 5th paragraph

“...the **Statement of the Use of System Charging Methodology Version 1/ Revision 4-2.**”