

Response to: Pricing Discussion Paper PDDN01
"Interruptible Charging Methodology Options for UNC Mod 0090"
Version 1.0

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Slant: Comments
Strictly Confidential: No

Abstract

Sorry for my late comments.

- (1) Most interruptible sites do not wish to move away from the current baseline. CIA believes that Option (c) is effectively adding a cap on prices and should not be progressed in its current form.
- (2) Consumers' costs will rise under both options. We would expect more costs under a tender approach but both approaches will involve participating in a new application process.
- (3) Locational charges will make this process more complicated for companies with multiple sites and/or in consortia.
- (4) At the moment we believe that customers should have choice in the form of the option and exercise fee, but this could make implementation more complex for GDNs.
- (5) Sites do not decide to be interruptible and then change this decision from one year to the next. The proposed process is very complicated and at the moment sites have little interest in tendering, whether their contract be for one or five years in length. We are not sure if a longer term contract merits further complexity, but believe that it will give the GDNs more certainty.

Any queries, please contact me.

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