



Alastair Owen
Ofgem
10 South Colonnade
Canary Wharf, London
E14 4PU

By email: ESOperformance@ofgem.gov.uk

Uniper UK Limited
Compton House
2300 The Crescent
Birmingham Business Park
Birmingham B37 7YE
www.uniper.energy

Registered in
England and Wales
Company No 2796628

Registered Office:
Compton House
2300 The Crescent
Birmingham Business Park
Birmingham B37 7YE

Response to: Consultation on licence amendments to facilitate the introduction of an Electricity System Restoration Standard
May 12, 2021

Uniper

Uniper is an international energy company with around 12,000 employees in more than 40 countries. The company is headquartered in Düsseldorf.

In the UK, Uniper operates a flexible generation portfolio of seven power stations capable of powering around six million homes, and a fast-cycle gas storage facility.

Consultation Response

Uniper notes the case made by BEIS to introduce a legally binding target for the restoration of electricity supplies in the event of an electricity system failure. The proposals that Ofgem put forward in this consultation, to incorporate requirements to implement this Electricity System Restoration Standard (ESRS) in the NGESO Transmission Licence, are an appropriate way to put this obligation in place. The approach outlined for reporting and the assurance framework appears to be broadly proportionate to demonstrate compliance with the ESRS and to provide confidence to stakeholders.

Once the Licence Conditions are changed the ESO will need to tender for system restoration services and engage with industry parties to put in place any changes to industry codes needed to deliver the ESRS. Changes may introduce new obligations that require parties to invest in new physical assets and procedures, the costs of which will be recovered in the market. Any measures that the ESO takes to bring forward additional services should be technology neutral and be applied to all parties. Any timescales for compliance with new measures should give due consideration to complexity and length of notice.

Uniper UK Limited